



## **2022 Affirmative Action Program (AAP) Overview**

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## AFFIRMATIVE ACTION PROGRAM PLAN

### Overview

The S&K Technologies, Inc. (hereinafter Company) affirmative action program (AAP) outlines our organization's program, policies and procedures for proactively recruiting, hiring, training and promoting women, minorities, people with disabilities and veterans to ensure that all individuals have equal opportunities in employment. The U.S. Department of Labor's Office of Federal Contract Compliance Programs (OFCCP) enforces compliance with the affirmative action requirements. Proactive steps by the Company to comply with the OFCCP's regulations will ensure that we will continue to be eligible to receive future federal contracts and subcontracts and reduce the risk of a difficult audit and an OFCCP-imposed penalty or remedy.

### Purpose of the S&K AAP Compliance Reference Guide

To achieve optimum legal compliance in all S&K Technologies, Inc. staffing and selection systems, procedures and processes across the Company, this reference guide provides the framework for all S&K Technologies, Inc. including mandates & standardization required to be compliant. Our intent is to mandate standardization where required by the Office of Federal Contract Compliance Programs (OFCCP) and the Department of Labor while allowing flexibility within each individual LLC on individual processes and structure where needed. For more information, please visit <http://www.dol.gov/OFCCP/>. Failure to comply could result in significant penalties and fines.

**What Does the OFCCP Do?** The purpose of the OFCCP is to ensure that businesses that have contracts with the Federal government (Government Contractors) do not discriminate in all practices of employment and will take affirmative action in hiring.

The OFCCP is responsible for overseeing:

- **Executive Order 11246:** Federal contractors may not discriminate on the basis of race, color, religion, sex, sexual orientation, gender identity, or national origin. The Executive Order also requires government contractors to take affirmative action to ensure that equal opportunity is provided.
- **Section 503 of the Rehabilitation Act:** Federal contractors shall take affirmative action to employ and advance in employment qualified individuals with disabilities.
- **The Vietnam Era Veterans' Readjustment Assistance Act of 1974:** Federal contractors "shall take affirmative action to employ and advance in employment qualified special disabled veterans, veterans of the Vietnam era and any other veterans who served on active duty during a war or in a campaign or expedition for which a campaign badge has been authorized."
- **Americans with Disabilities Act of 1990 (ADA):** The ADA prohibits most private and government employers from discriminating against qualified individuals with disabilities with respect to hiring, firing, advancement and other terms and conditions of employment.



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### **Expectations of the OFCCP**

The auditing process requires the OFCCP to take an in depth look at every contractor it investigates. Therefore, it is crucial that the Company maintain accurate and easily reviewable records for all affirmative action and employment decisions related to hiring. As such, the S&K AAP Compliance Reference Guide has been developed to help prepare in the event the OFCCP requests you conduct an audit of the sourcing and selection processes used within your LLC.

### **Compliance Owners**

- Executive Leadership Team
- Human Resources
- Hiring Managers

### **CONTENT**

**Case-Studies/Presentations/Tests**

**Good Faith Efforts**

**Job Description**

**Interview Skills Training**

**Compliance Job Boards and Outreach**

**Talent Acquisition Process and Technology**

- Interview Stage
- Debrief Session
- Deviations

**Record Retention**

**Annual Review**



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### ADVERSE IMPACT

#### Purpose

The EEOC has primary responsibility for the enforcement of laws prohibiting adverse impact resulting from pre-employment testing or selection procedures. Pre-employment tests or other selection procedures having an adverse impact on employment of individuals based on the individual's race, sex or national origin is generally considered to be employment discrimination.

#### What Is Adverse Impact?

Adverse impact occurs when a decision, practice or policy has a disproportionately negative effect on a protected group, even though the adverse impact may be unintentional. The EEOC guidelines define adverse impact as "a substantially different rate of selection in hiring, promotion or other employment decision which works to the disadvantage of members of a race, sex or ethnic group." When adverse impact exists, an organization may be vulnerable to charges of discrimination.

Typically, adverse impact is determined by using the four-fifths or eighty percent rule. The four-fifths or 80% rule is described by the guidelines as "a selection rate for any race, sex, or ethnic group which is less than four-fifths (or 80%) of the rate for the group with the highest rate will generally be regarded by the Federal enforcement agencies as evidence of adverse impact, while a greater than four-fifths rate will generally not be regarded by Federal enforcement agencies as evidence of adverse impact." Since the 80% test does not involve probability distributions to determine whether the disparity is a "beyond chance" occurrence, it is usually not regarded as a definitive test for adverse impact. Instead, other statistically significance tests, such as the standard deviation analysis, may be used for this purpose. *(Excerpt: Workplace Dynamics, LLC)*

#### Candidate Testing and Assessments

The Company is introducing more behavioral based questions relating to the technical and functional capabilities of the role that an Interviewer or Interview Panel use and then assess talent based on candidate responses.

**Example #1:** When you need to know how candidates will quickly come up to speed in their new role.

- o How did you approach your first 90-days in your last job?
- o What were the successes?
- o What would you do differently?"

**Example #2:** If you need to understand someone's level of experience in Excel

- o Ask what has been the highest level of complexity they have created in a spreadsheet?
- o What were specific details of the design?
- o Would they have designed it differently once it was operational/in use?



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If questioning computer application skills, for example, you can better learn someone's skill set by listening to their knowledge of formatting, creating pivot tables, etc. Therefore, below are few more examples of how to streamline your process to assess against technical and functional capabilities.

- Introduce behavioral questions relating to technical/functional capability for all roles.
- Create 2-3 technical/functional questions in all stages of the screening process. This will ensure we are assessing our analytical/technical roles effectively.
- Coach hiring managers in using behavioral based interviewing skills effectively.
- Standardize interview templates to include technical questions.
- Periodic adverse impact analysis needs to be completed on any validated assessment tool to ensure assessments are not creating an adverse impact. For example, if members of the protected class score lower than others, this would be viewed as an adverse impact. Talk with you HR Representative for more details.

### **Best Practices for Testing and Selection Based on the DOL**

- Employers should administer tests and other selection procedures without regard to race, color, national origin, sex, religion, age (40 or older), or disability.
- Employers should ensure that employment tests and other selection procedures are properly validated for the positions and purposes for which they are used. The test or selection procedure must be job-related, and its results appropriate for the employer's purpose. While a test vendor's documentation supporting the validity of a test may be helpful, the employer is still responsible for ensuring that its tests are valid under UGESP.
- If a selection procedure screens out a protected group, the employer should determine whether there is an equally effective alternative selection procedure that has less adverse impact and, if so, adopt the alternative procedure.
- To ensure that a test or selection procedure remains predictive of success in a job, employers should keep abreast of changes in job requirements and should update the test specifications or selection procedures accordingly.
- Employers should ensure that tests and selection procedures are not adopted casually by managers who know little about these processes. A test or selection procedure can be an effective management tool, but no test or selection procedure should be implemented without an understanding of its effectiveness and limitations for the organization, its appropriateness for a specific job, and whether it can be appropriately administered and scored.

### **Validation and Interviewing**

- Research shows that behavioral based interviewing, when done correctly, is one of the most effective ways to assess candidates during the selection process.



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### Paper Applications

- Paper applications are an acceptable accommodation for those who need this as an option. HR will enter the candidate information, so it is hidden from the hiring manager if the application is electronic or paper. If a candidate does ask about paper, please work with your HR BP so we can support the candidate through this process.

### JOB DESCRIPTION

#### Purpose

To understand the purpose of a Job Description, one needs to understand how the OFCCP defines an Applicant. The OFCCP defines an Internet applicant as anyone:

- . . . who submits an expression of interest in employment through the Internet or related electronic data technology;
- . . . who is considered by the employer for employment in a position;
- . . . who indicates they possess minimum qualifications for the position;
- . . . who does not withdraw from consideration.

The Internet greatly increases the volume of potential candidates who visit organization's websites and submit resumes for positions. Generally, these potential candidates are not qualified because they lack one or more of the requirements that are included in the job description. The OFCCP ruling is clear that those who do not meet one or more requirements for the position are not candidates.

Therefore, due to the increase of internet applications, taking the time to define responsibilities and qualifications that are required to perform a specific job decreases the number of applicants. Having a clearly defined Job Description not only minimizes the Company's risk in regard to compliance but it also increases the quality of candidates that you'll see throughout the recruitment process.

#### How to Create a Compliant Job Description?

You can create a Job Description that is not only compliant but also helps streamline our recruitment process by focusing on the "Qualifications Section" of the Job Description. The Company strongly relies on our job descriptions by splitting this Section into four (4) equal parts of Education, Experience, License/Cert/Registration, and Special Knowledge/Skills/Abilities. These four parts contain two (2) segments each noting either **Required Minimum Qualifications** vs. **Preferred Qualifications**. This can also be demonstrated by listing the qualification and stipulating if it is required or preferred.

**"Required Minimum Qualifications"** are the qualifications advertised to potential applicants as being required in order to be considered for the position. Minimum requirements are true requirements needed to perform the role and must be job related. Example: Bachelor's degree required vs bachelor's degree or related experience.



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**“Preferred Qualifications”** are the qualifications that identify our ideal candidate. The preferred qualifications are essential to include in the job description as they allow those involved in the recruitment process to narrow down their search further if a job posting receives an unmanageable number of applicants. In addition, preferred qualifications allow us to explain our hiring decisions if ever asked to explain or defend them to the OFCCP.

### **SAMPLE Job Description**

**Job Title:** Human Resources Manager

**Reports to:** Human Resources Director

**POSITION PURPOSE:** The Human Resources manager originates and leads Human Resources practices and objectives that will provide an employee-oriented; high performance culture that emphasizes empowerment, quality, productivity, and standards; goal attainment, and the recruitment and ongoing development of a superior workforce. The Human Resources manager is responsible for the development of processes and metrics that support the achievement of the organization's business goals.

*The Position Purpose is followed by a section titled, Expectations of All S&K Team Members. This section is consistent throughout every job description although management positions also include a section titled, “Core Manager Behavioral Expectations” and a line that requires agreement by the candidate upon job acceptance.*

#### **ESSENTIAL FUNCTIONS:**

1. Develops and administers various human resources plans and procedures for all company personnel.
2. Plans, organizes, and controls all activities of the department. Participates in developing department goals, objectives, and systems.
3. Implements and annually updates compensation program; rewrites job descriptions as necessary; conducts annual salary surveys and develops merit pool (salary budget); analyzes compensation; monitors performance evaluation program and revises as necessary.
4. Develops, recommends, and implements personnel policies and procedures; prepares and maintains handbook on policies and procedures; performs benefits administration to include claims resolution, change reporting, approving invoices for payment, annual re-evaluation of policies for cost effectiveness, information activities program, and cash flow.
5. Develops and maintains affirmative action program; files EEO-1 annually; maintains other records, reports, and logs to conform to EEO regulations.
6. Conducts recruitment effort for all exempt and nonexempt personnel, students, and temporary employees; conducts new-employee orientations; monitors career pathing program, employee relations counseling, outplacement counseling, and exit interviewing; writes and places advertisements.
7. Establishes and maintains department records and reports. Participate in administrative staff meetings and attends other meetings, such as seminars. Maintains company organization charts and employee directory.
8. Evaluates reports, decisions, and results of department in relation to established goals. Recommends new approaches, policies, and procedures to effect continual improvements in efficiency of department and services performed.

#### **CORE JOB QUALIFICATIONS:**

##### **Education**

Bachelor's degree in Human Resource Management, Business Administration, Psychology or a related field required.  
Master's degree in Human Resources Management Preferred

##### **Experience**

Five (5) years' experience in direct role as HR Business Partner or HR Manager is required

##### **License, Cert or Registration**

Senior Professional in Human Resources (SPHR) certification preferred

##### **Special KSAs**

Demonstrate experience with a Human Resources Applicant Tracking System and HRIS System is required  
Demonstrate proficiency in Microsoft Office required  
Demonstrate experience managing Affirmative Action Plans required



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### INTERVIEW SKILLS TRAINING

#### **Purpose**

The purpose of training is to educate Hiring Managers on Effective Interviewing, the S&K Employment Process (not including global roles) and Compliance & Legal Awareness of hiring practices. This training will bring awareness to the legal implications during the sourcing and selection of talent. This will ensure all parties are compliant at every stage of the recruiting process.

#### **Who should take the Interview Skills Training?**

All employees involved in the Recruitment Process are required to complete the Interview Skills Training prior to talking or meeting with candidates.

#### **Finding the Interview Skills Training**

The Interview & Compliance Training is an E-Learning Self-Directed Module and can be found on the HR intranet located under Training & Education/Self-Guided Training. Training will take approximately 45 minutes, and your HR BP will assist you with any questions you have either during or following your training.

### COMPLIANCE JOB BOARDS AND OUTREACH

#### **Purpose**

As required by the OFCCP, the Company must post all external job openings to the appropriate state and local employment offices, as well as veteran facilities. In order to ensure we can maintain consistent compliance with the OFCCP, the Company has contracted with CIRCA, a compliance posting solution which allows us to post our job openings to highly targeted US State locations, as well as other affirmative action and diversity sites –all from our own job site. CIRCA comes in and “picks up” our jobs and allocates the postings to the correct job boards and agencies. This information is tracked within the CIRCA system and allows the Company to review reports and/or reach out and establish and grow networks within those talent segments that we need to cultivate. By utilizing CIRCA’s services, they help us remain in compliance with the below EEO laws.

#### **Outreach Efforts During 2021**

- S&K Career Center website – Request for Accommodation and Request for Application Support
- CIRCA, Inc. – Networking platform to specialty agencies
- Lake County Job Service Employers’ Committee – Vice President/Chair – Montana
- Society of Human Resource Management Association – Middle Georgia Local Chapter & Big Sky Chapter of Montana
- Missoula Businesswomen’s Network – Mission Valley Chapter
- Char-Koosta Flathead Reservation Newspaper
- LinkedIn – Social Media Networking
- S&K Facebook – job posting



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### The OFCCP enforces the following laws for Federal Contractors and Subcontractors:

- Prohibiting discrimination in hiring or employment decision on the basis of race, color, religion, sex, sexual orientation, gender identity, or national origin. (Executive Order 11246)
- Prohibits discrimination and requires equal employment opportunity in all personnel practices for qualified individuals with disabilities (Section 503 of Rehabilitation Act of 1973)
- Prohibits discrimination and requires equal employment opportunity in all personnel practices for disabled veterans, Vietnam Era veterans and other protected veterans. (38 U.S.C. 4212: The Vietnam Era Veterans' Readjustment Act of 1974 (VEVRAA))

## INTERVIEW & PHONE SCREEN STAGE

### Purpose

The Interview Stage involves Phone Screens as well as Video or In-Person Interviews. The purpose of an interviewing process is to make the best hiring decision while also ensuring compliant and consistent practices to select best talent. It is during the interview stage that the potential for liability is significant as it is illegal to discriminate against applicants within protected categories. Therefore, when preparing interview questions for candidates interviewing for a job at S&K it is important to follow some basic guidelines.

### Best Practice

To ensure your Job Interview is not only compliant but successfully evaluative, all our managers are to follow:

- **Ask the same questions, in the same order:** By asking the same questions of all applicants, in the same order you can avoid a claim that any one individual was singled out because of a protected characteristic as ensures candidates have equal opportunities to provide information and are assessed accurately and consistently. It might seem odd, but the manager is responsible for the selection of talent as much as they are responsible for the protection of the Company by ensuring compliant processes are followed.
- Corporate HR will provide a Phone Screen template and assist with a selection of behavioral based questions to support the hiring manager's activity.
- **Limit questions to job-related areas:** Interview questions should focus on the education, experience, and abilities of the applicant and suitability for the position.
- For more information on the Do-and-Do Not of interview questions, please refer to the Interview Training Module within our Manager Training Courses or talk with your HR Representative.
- Be sure to pre-establish who will conduct phone screens, participate in panel interviews, and recap during a debrief at the end of the process – this helps us remain consistent throughout the hiring process.

It is important to be consistent on who does the screenings for candidates assessed in the same selection process, as well as asking the same core questions. If there are discrepancies in questions asked or discrepancies within the steps of the process, this needs to be documented.



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**Example of Technical Screening Questions: Review Work History: Discuss Various Employers & Responsibilities**

*(if employed):* What is your motivation in looking for a new position?

*(if unemployed):* What is your last date of employment, and why did your role end?

Notes:

In your words, please explain to me your understanding of this position and its duties. Please describe to me how your current (or most recent) position will enable you to be successful in this role.

Notes:

What software packages and applications are you proficient in?

Notes:

Why S&K?: What attracted you to this company?

*Look for their understanding of the Mission, Values, and the research they've done, etc.*

Notes:

If offered a position, when would you be available to start?

Notes:

**Example of Competency Screening Questions:**

When you were leading a project or a team, tell me about how you organized the work, followed up, set objectives, and measured the results.

Notes:

What are the three most useful things you learned about yourself by asking your team/manager/customers for feedback? What did you do with the feedback?

Notes:

In your current/previous position, what do you consider your greatest accomplishment(s)? How did you exceed your own expectations?

Notes:

Tell me about a time when you had to make an important decision or take action without having all the information you needed.

Notes:



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### Dimensional Questions:

- How did you approach your project work? How did you accomplish the project work?
- Explain your thinking - why you selected that approach. Why did you choose to do it that way?
- What was the result? What was the impact?
- What did you take away from that experience? What did you learn? What would you do differently?
- Describe a time when you used those lessons in different situations.

### Closing:

*Thank you very much for your time. As we have a number of candidates to screen, we need to complete that process and will be contacting those we'd like to interview in person within the next week. However, before we end, I'd like to make sure I've addressed any questions you might have about S&K or this opportunity.*

### CANDIDATE DISPOSITION CODES

#### Purpose

All candidates who apply to a position via our current applicant tracking system, and are not moving forward in the hiring process, must be assigned a disposition reason for proper tracking and EEOC reporting. Disposition reasons must accurately reflect why a candidate was not selected for the position as it relates to the position and the qualifications.

#### Available Disposition Codes to Assign

Below is a list of some of the disposition codes:

- New Applicant
- Phone Screen
- HM Review
- Interview
- Hired

Below is a list of disposition reasons why you might not have selected:

- Another qualified candidate selected
- Did not meet profile requirements for the role
- Withdrew/Declined
- Reviewed, Not Qualified
- Salary out of range
- Not eligible to work in this country (adding)
- Background/reference (adding)
- Behavioral competencies not met (adding)
- Conflict of interests (adding)
- Applied after hiring selected



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- Personal reasons given
- Accepted counteroffer from current employer
- Accepted offer from another employer
- Not able / not willing to relocate
- Not able / not willing to travel
- Feels that salary is insufficient
- Feels that position lacks promotional opportunities

### Assigning Disposition Codes to Candidates

Within the ADP system, the Hiring Manager completes disposition reasons for all candidates who have applied for the open position. This must be done in a timely manner to inform the status of the candidate's application.

### DEBRIEF

#### Purpose

The purpose of the Debrief is to ensure the hiring manager and/or interview panel is committed to their selection and that a fair and compliant process is consistently applied.

- Discuss any disparities within assessment
- Confirm team is in alignment of selected candidate
- **All Interviewers may not be in 100% agreement of selection but must demonstrate their commitment and full support of the selected candidate. In the end, it is the hiring manager's accountability for the offer.**
- Agree on message/feedback provided to internal candidate(s) not selected

#### Interview Team Responsibilities

This outlines the roles that will need to be covered to ensure a successful and compliant Assessment

- Come prepared with tangible examples of strengths & opportunities for each candidate
- Review Culture Fit
- Long-Term Career Potential
- Make sure feedback is gathered throughout discussion into Debrief Feedback Template and confirm accurate reflection of what was discussed
- Once selection has been made, confirm next steps (Additional Interviews, Prepare Offer, etc.)
- Provide feedback to Internal candidate(s) not selected
- Provides Turndowns to any external candidate(s) not selected



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### **Assessment Debrief Discussion**

Follow the points below in the assessment discussion

- Discuss Overall Interview
- Review Strengths & Opportunities
- Confidence
- Communication Skills
- Concise Answers
- Technical Knowledge
- Industry Knowledge
- Provided Examples from current or previous role
- Asked Appropriate Questions regarding Job, Organization, Team, etc.
- Review Strengths & Opportunities

### **Conclusion of candidate:**

- Recommendation to Hire – Yes or No
- Developmental Opportunities – If successfully selected, what development areas does the Hiring Manager need to focus on
- Only good fit for specific Job Opening or Long-term potential

### **Best Practice**

The intention of documenting a Recruitment Approach is to support S&K if ever faced with a desk audit from the Department of Labor.

## **RECRUITMENT APPROACH & DEVIATIONS**

### **Audit Preparedness**

This Audit Preparedness section is offered to hiring managers to showcase the importance of documenting the sourcing & selection process for legal and reference purposes. The documentation listed below is documentation that the Department of Labor would request upon visiting your site for a desk audit. Therefore, it is in your LLC's best interest to have the documentation below well-organized and easily accessible. If you are ever called upon to explain or defend your hiring decisions, you will need documentation of the process that led to the decision. Be sure to work with your HR Generalist to ensure documentation is retained.



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Documents can be organized several ways. Please see the following examples:

- An electronic copy of a Job Description that has already been used to source and hire talent and that current employees are most likely serving in.
- If a candidate completed an on-line profile and uploaded their resume, a soft copy of the resume or application will suffice.
- If you received a resume through another means other than the S&K application in our Career Center, you will need to have the candidate create a profile in our system.

Be sure you can easily retrieve the following documentation:

Job Title:

Requisition #:

Hiring Manager:

Job description

Recruitment Strategy *(if applicable)*

Documentation that Job Opening was posted on Compliance Job Boards

Resumes/Applications of candidates reviewed for Job Opening

Phone screen notes from all candidates (Recruiter and Hiring Manager)

If a Validated Assessment was conducted, results are documented

Documentation of Interview and/or Debrief/Feedback Notes

If a candidate declines an offer, decline documentation is maintained

Deviations *(see below)*

Disposition Codes documented for all candidates

### **Recruitment Approach**

Document the procedure that defines how candidates are selected for screening. If adjustments are needed after the initial procedure is executed, please include the updates. For example:

Phase 1 *"The first local 100 candidates will be reviewed"*.

Phase 2 *"Reviewed candidates who lived in Connecticut and New York"*.

### **Deviations**

Document any deviations from the standard recruitment approach.

For example, *"Candidate #2 was phone screened by HR instead of the Hiring Manager due to the Hiring Manager being sick the day the phone screen was scheduled."*

### **Reason Codes Documented for all Candidates**

Status of candidates using "Reason Codes" must be submitted for each step of the selection process. Use the drop-down selection options, and then use the text field to define the option chosen. It must be clear why candidates are or are not moving through the selection process. Only those candidates that have been reviewed, as defined above in the Candidate Selection Procedure, need to be coded. Manage the documentation for each job opening and review before full closure.



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### RECORD RETENTION

#### Purpose

There are requirements around the timeframe that recruitment records need to be kept (electronically or manually). The Company utilizes a Consolidated Policy titled *HR 100.28 Retention of Records*.

### ANNUAL REVIEW COMPONENTS

#### Purpose

Best practice (*SHRM: 10 Ways to Positively Close Plan Year by Pam Ploor, J.D.*) is to conduct an annual review to ensure compliance during the affirmative action plan year.

- Review the results of adverse impact analyses for applicants to hires, employees to promotions, and employees to terminations, and follow up on the results that are statistically significant to ensure the company can explain the results.
- Review personnel processes for individuals with disabilities and protected veterans in a form that allows the contractor to prove its review (i.e., a checklist). Common issues are parking lot and building accessibility, Braille signage, visibility of posters to a person in a wheelchair, and website accessibility.
- Audit compliance with periodic review of physical and mental qualifications in job descriptions, review of denied requests for reasonable accommodation, implementation of anti-harassment practices related to disabled individuals and protected veterans, designation of person responsible for affirmative action in all communications, annual manager training on a contractor's obligations, progress against disabled individuals' goal of 7 percent, and the contractor's hiring benchmark for protected veterans. This review should be documented so the contractor may show its audit to OFCCP.
- Review the company's self-identification questions for race, sex, disability and protected veteran status. The company should confirm that each question has an option for a person to decline to self-identify and that the questions cannot be skipped. The company should confirm that it is using the mandatory language for disability self-identification.
- Review purchase order terms and conditions to ensure OFCCP's required clauses are included.
- Update the equal employment opportunity statement or policy, as applicable for regulatory changes, for the upcoming calendar year and post for employee and candidate access.
- Ensure our candidate "Invitation to Self-Identify" encourages protected veterans and disabled people to self-identify themselves to the Company.
- Assess and document our external recruitment sources for protected veterans and disabled people.
- Prepare report on affirmative action results to management.
- Conduct discrimination-focused compensation analysis, which is an annual requirement for a contractor.