



AFFIRMATIVE ACTION PROGRAMS: Creating an Inclusive Workplace

**Arizona Industry Liaison Group
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Presentation Overview

- Purpose of Affirmative Action Programs
 - 41 CFR § 60-2.10
- Required Quantitative Analyses
 - 41 CFR § 60-2.11 through 2.16
- Additional Required Elements
 - 41 CFR § 60-2.17
- Question & Answer Session

Purpose of Affirmative Action Programs

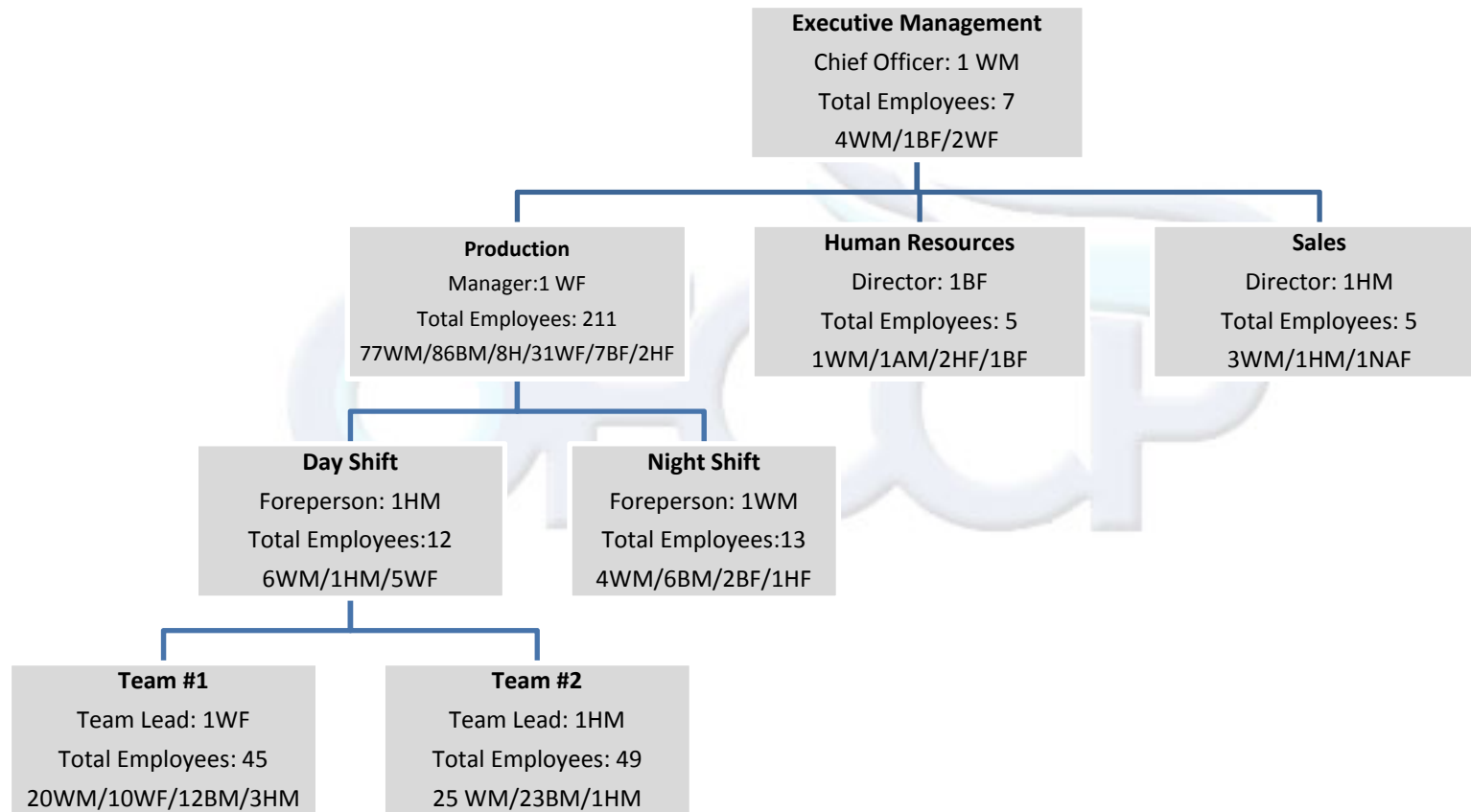
- Management tool designed to ensure equal employment opportunity
- Institutionalizes the company's commitment to equality in every aspect of the employment process
- Creates an inclusive and diverse workplace

Required Quantitative Analyses

- 41 CFR § 60-2.11: Organizational Profile
- 41 CFR § 60-2.12: Job Group Analysis
- 41 CFR § 60-2.13: Placement of Incumbents in Job Groups
- 41 CFR § 60-2.14: Determining Availability
- 41 CFR § 60-2.15: Comparing Incumbency to Availability
- 41 CFR § 60-2.16: Placement Goals

Organizational Display

41 CFR § 60-2.11



Workforce Analysis

41 CFR § 60-2.11

Workforce Analysis												
Department: Sales												
Job Title	Wage Rate	All Employees			Incumbents by Minority Group							
					Male				Female			
		Total	Male	Female	B	H	A	NA	B	H	A	NA
Sales Manager	100+	1		1						1		
Assistant Manager	90+	2	1	1								
Commissioned Sales	80+	40	35	5	1						1	
Billing Clerk	45+	2		2								
Department Totals		45	36	9	1					1	1	

Job Group Analysis

41 CFR § 60-2.12

Job Titles	Job Group Name	EEO-1 Category
Executive Assistant	5	Office & Clerical
Administrative Assistant		
File Clerk		
Billing Clerk		
Inventory Control Clerk		
Material Pricing Clerk		
Customer Information Sales Representative		
Call Center Agent		
Customer Service Complaints Clerk		

Placement of Incumbents

41 CFR § 60-2.13

Job Group	Total # of Incumbents	# of Females	Female Incumbency %	# of Minorities	Minority Incumbency %
5	30	25	83.3	13	43.3

Job Group Analysis

41 CFR § 60-2.12 & 2.13

Job Group: 5 Office & Clerical

Job Title	Total Employment	Total Females		Total Minorities	
		#	%	#	%
Executive Assistant	1	1	100.00	0	00.00
Administrative Assistant	5	5	100.00	1	20.00
File Clerk	4	3	75.00	2	66.66
Billing Clerk	3	2	66.66	1	33.33
Inventory Control Clerk	2	2	100.00	0	00.00
Material Pricing Clerk	3	2	66.66	1	33.33
Customer Information Sales Representative	6	6	100.00	2	33.33
Call Center Agent	3	2	66.66	0	00.00
Customer Service Complaints Clerk	3	2	66.66	1	33.33

Total Employment	Total Female #	Total Female %	Total Minority #	Total Minority %
30	25	83.33	8	26.66

Determining Availability

41 CFR § 60-2.14

Total Employees in Job Group: 30		Job Group: Office & Clerical				
Factors	Raw Statistics			Weighted Factor		Plan Year: 2012
	Female	Minority		Female	Minority	
External: % of minorities or females in a reasonable recruitment area	71.23	37.92	90%	64.10	34.12	Data Source: 2000 EEO1 File; Census of the U.S. population *Maricopa County
						Reason for weight: Historical Hiring Patterns
Internal: % of minorities or females promotable, transferable or trainable	21.87	15.63	10%	2.18	1.56	Data Source: Feeder Job Group statistics
						Reason for weight: Incumbents up for review or promotion
Final Availability Estimate:			100%	66.28	35.68	*www.census.gov

Composite Availability

41 CFR § 60-2.14g

Job Group: 5 Office & Clerical

Job Title	Weight	Percentage	Minority
Executive Assistant (570)	1	3.33	$19.1 \times .0333 = 0.64$
Administrative Assistant (570)	5	16.66	$19.1 \times .1666 = 3.18$
File Clerk (526)	4	13.33	$30.6 \times .1333 = 4.08$
Billing Clerk (511)	3	10.00	$29.5 \times .1000 = 2.95$
Inventory Control Clerk (562)	2	6.66	$34.5 \times .352 = 12.14$
Material Pricing Clerk (511)	3	10.00	$29.5 \times .1000 = 2.95$
Customer Information Sales Representative (535)	6	20.00	$31.3 \times .2000 = 6.26$
Call Center Agent (524)	3	10.00	$28.6 \times .1000 = 2.86$
Customer Service Complaints Clerk (524)	3	10.00	$28.6 \times .1000 = 2.86$
Total	30	100.00	37.92%

Comparing Incumbency to Availability

41 CFR § 60-2.15

Placement Goals

41 CFR § 60-2.16

Job Group	Total Incumbents	Female Incumbency (%)	Female Availability (%)	Less than Reasonably expected? (Yes or No)	Minority Incumbency (%)	Minority Availability (%)	Less than Reasonably expected? (Yes or No)
Manager	9	0.0%	47.6%	Yes	11.1%	18.1%	Yes
Professional	22	45.5%	43.8%	No	18.2%	8.2%	No
Sales	10	20.0%	34.5%	Yes	0.0%	12.4%	Yes
Office & Clerical	30	83.3%	71.23%	No	26.6%	37.92%	Yes



Establish goals in areas where incumbency is less than availability.

Good Faith Efforts

- When underrepresentation is discovered, contractors must not only set goals, but should make good faith efforts to expand employment opportunities for females and/or minorities.
- Contractors must:
 - Evaluate the workforce
 - Comply with requirements such as listing employment openings with the State Job Service
 - Establish meaningful relationships with Community-Based Organizations (CBOs) for recruitment
 - Implement Additional Required Elements of affirmative action programs

Additional Required Elements

41 CFR § 60-2.17

- 41 CFR § 60-2.17a: Designation of Responsibility
- 41 CFR § 60-2.17b: Identification of Problem Areas
- 41 CFR § 60-2.17c: Action-Oriented Programs
- 41 CFR § 60-2.17d: Internal Audit & Reporting System

Designation of Responsibility

41 CFR § 60-2.17a

- Assign and identify an official responsible for the implementation and monitoring of equal employment opportunity and affirmative action
- Ensure EEO/AA results are communicated to upper management

Identification of Problem Areas

41 CFR § 60-2.17b

- Perform an in-depth analysis of total employment process to determine if there are impediments to equal employment opportunity:
 - Workforce Representation
 - Personnel Activity
 - Compensation
 - Selection, Recruitment, Referral
 - Revise policies/practices as appropriate

Action-Oriented Programs

41 CFR § 60-2.17c

- Correct any problem areas identified and attain established goals and objectives
 - Make good faith efforts to remove barriers, expand employment opportunities, and create measurable results
 - Specifically state what actions will be taken to correct any problem areas
 - Ensure that the same procedures which produced inadequate results are not followed again

Action-Oriented Programs

(Cont'd)

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- Good faith efforts to remove identified barriers and expand employment opportunity via:
 - Innovative outreach and recruitment
 - Employee development and training programs
 - Executive management development programs, including succession planning and incentives
 - Employee support and mentoring programs or initiatives
 - Accountability and measurable results from the successful good faith efforts

Internal Auditing & Reporting

41 CFR § 60-2.17d

- Develop and implement an internal auditing system to periodically measure the effectiveness of its total affirmative action program
 - Monitor records of all personnel activity, including referrals, placements, transfers, promotions, terminations, and compensation at all levels to ensure the nondiscriminatory policy is carried out
 - Require internal reporting on a scheduled basis as to the degree to which equal employment opportunity and organizational objectives are attained
 - Review report results with all levels of management
 - Advise top management of program effectiveness and submit recommendations to improve unsatisfactory performance

Questions & Answers

- Anyone may contact OFCCP for assistance:
 - Understanding regulatory requirements
 - Other compliance matters
 - Filing a complaint

Contact Information:

Phoenix District Office: (602) 514-4660

Website: www.dol.gov/ofccp



