

**COLLINS CONSULTING, INC.**

**AFFIRMATIVE ACTION PLAN**

**FOR INDIVIDUALS WITH DISABILITIES**

**AND FOR VETERANS OF THE VIETNAM ERA**

AAP Year Date: January 1, 2009 to December 31, 2009.

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# Collins Consulting, Inc.

## **A. EQUAL EMPLOYMENT OPPORTUNITY POLICY** **41 C.F.R. §§ 60-741.44(a);-250.1**

To provide equal employment and advancement opportunities for all individuals, employment decisions at the Company are based on merit, qualifications, and abilities. The Company does not discriminate in employment opportunities or practices on the basis of race, color, religion, sex (including pregnancy, childbirth or related medical conditions), national origin, ancestry, age, disability, family care status, veteran status, or any other characteristic protected by law.

The Company makes reasonable accommodations for qualified individuals with known disabilities unless doing so would result in an undue hardship to the Company. The Company prohibits harassment of any individual on the basis of any characteristic listed above. For information regarding the Company's internal policies for addressing complaints of harassment, please refer to the Company's Policy Against Harassment.

This policy governs all aspects of employment, including selection, job assignment, compensation, discipline, termination, and access to benefits and training.

Any employees with questions or concerns about any type of discrimination in the workplace are encouraged to bring these issues to the attention of their immediate supervisor, any other person in management, up to and including the President. Employees can raise concerns and make reports without fear of reprisal, harassment, intimidation, threats, coercion or discrimination because they: (1) file a complaint with the Company or with federal, state, or local agencies; (2) assist or participate in any investigation, compliance review, hearing, or any other activity related to the administration of any federal, state or local equal employment opportunity or affirmative action statute; (3) oppose any act or practice made unlawful by federal, state or local law requiring equal employment opportunity or affirmative action; or (4) exercise any other employment right protected by federal, state or local law or its implementing regulations.

The Company maintains an audit and reporting system to determine overall compliance with its equal employment opportunity mandates and to respond to any specific complaints applicants or employees file with the Company's equal employment opportunity office. Overall responsibility for the implementation of the Company's equal employment opportunity programs and for affirmative action compliance activities is assigned to Cynthia Collins, Vice President, Strategic Operations.

## **B. REVIEW OF PERSONNEL PROCESSES** **41 C.F.R. §§ 60-741.44(b);-250.6(b)**

The Company makes certain that its personnel processes provide for careful, thorough, and systematic consideration of the job qualifications of applicants and employees with known

disabilities and for Vietnam Era Veterans for job vacancies filled either by hiring or promotion, and for all training opportunities offered or available.

The Company ensures that its personnel processes do not stereotype disabled persons or Vietnam Era Veterans in a manner which limits their access to jobs for which they are qualified.

The Company also periodically reviews its processes and makes any necessary modifications to ensure that these obligations are carried out. The following procedures facilitate a review of the implementation of these requirements are drawn from, among other things, Appendix C of OFCCP's Regulations implementing Section 503 of the Rehabilitation Act of 1973.

**C. PHYSICAL AND MENTAL QUALIFICATIONS**  
**41 C.F.R. §§ 60-741.44(c);-250.6(c)**

The Company reviews all physical and mental job qualification requirements with line management and supervisors to ensure that, to the extent qualification requirements screen out or tend to screen out qualified disabled individuals or Vietnam Era Veterans, they are job-related and consistent with business necessity and the safe performance of the job. The schedule of the review is as new job qualification requirements are established;

To the extent that physical or mental job qualification requirements screen out or tend to screen out qualified disabled individuals or Vietnam Era Veterans in the selection of employees or applicants for employment or other changes in employment status such as promotion or training, the Company assures that the requirements are related to the specific job(s) for which the individual is being considered and are job-related and consistent with business necessity and the safe performance of the job.

**D. REASONABLE ACCOMMODATION TO PHYSICAL AND MENTAL LIMITATIONS**  
**41 C.F.R. §§ 60-741.44(d);-250.6(d)**

The Company makes reasonable accommodation to the known physical or mental limitations of all otherwise qualified individuals with a disability, unless it can demonstrate that the accommodation would impose an undue hardship on the operation of our business. 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, the Company confidentially notifies the employee of the performance problem and inquires whether the problem is related to the employee's disability. If the employee responds affirmatively, the Company confidentially inquires whether the employee is in need of a reasonable accommodation.

**E. PROCEDURES**  
**41 C.F.R. §§ 60-741.44(e)**

- (1) The Company enlists the assistance and support of recruiting sources (including State employment security agencies, State vocational rehabilitation agencies or facilities, sheltered workshops, college placement officers, State education agencies, labor organizations and organizations of or for individuals with disabilities) to provide meaningful employment opportunities to qualified individuals with disabilities and Vietnam Era Veterans.
- (2) The Company's recruitment efforts at all schools incorporate special efforts to reach students with disabilities and Vietnam Era Veterans. The Company engages in recruitment activities at educational institutions which participate in training of individuals with disabilities and Vietnam Era Veterans, such as schools for the blind, deaf, or learning disabled and Vietnam Era Veterans training centers.
- (3) The Company has established contacts with appropriate social service agencies, organizations of and for individuals with disabilities and Vietnam Era Veterans, and vocational rehabilitation agencies or facilities for such purposes as advice, technical assistance and referral of potential employees. Technical assistance from the resources described in this paragraph consist of advice on proper placement, recruitment, training and accommodations, but no such resource providing technical assistance has authority to approve or disapprove the acceptability of our affirmative action programs.
- (4) The Company will include individuals with disabilities and Vietnam Era Veterans when employees are pictured in consumer, promotional or help wanted advertising when these activities are undertaken. Moreover, individuals with disabilities participate in career days, youth motivation programs, and related activities in their communities when these activities are undertaken.
- (5) The Company notifies all subcontractors, vendors and suppliers of Company policy and requests appropriate action on their parts.
- (6) The Company takes positive steps to attract qualified individuals with disabilities and Vietnam Era Veterans not currently in the work force who have requisite skills and can be recruited through affirmative action measures. The Company locates these persons through the local chapters of organizations of and for individuals with disabilities and Vietnam Era Veterans.
- (7) The Company considers applicants with known disabilities and those known to be Vietnam Era Veterans for all available positions for which they may be qualified when the position(s) applied for is unavailable.

**F. INTERNAL DISSEMINATION OF POLICY**  
**41 C.F.R. §§ 60-741.44(g);-250.6(g)**

The Company recognizes that even a strong outreach program will be ineffective without adequate internal support from supervisory and management personnel and other employees, who may have had limited contact with individuals with disabilities or with Vietnam Era Veterans in the past. To assure greater employee cooperation and participation in the Company's efforts with respect to the disabled and Vietnam Era Veterans, the Company has developed the following internal procedures to communicate its obligation to engage in affirmative action efforts to employ and advance in employment qualified individuals with disabilities. These procedures are designed to foster understanding, acceptance and support among the Company's executives, management, supervisory and other employees and to encourage such persons to take the necessary actions to aid the Company to meet its obligations.

The Company conducts special meetings with executive, management and supervisory personnel to explain, from time to time, the intent of the Company's anti-discrimination and anti-harassment policies and individual employee responsibility for effective implementation, making clear the Chief Executive Officer's attitude.

The Company discusses the policy thoroughly at both employee orientation and management training programs.

The Company includes individuals with disabilities and Vietnam Era Veterans in Employee Handbooks and similar employee publications, when employees are featured in same.

**G. AUDIT AND REPORTING SYSTEM**  
**41 C.F.R. §§ 60-741.44(h);-250.6(h)**

The Company has designed and implemented an audit and reporting system that:

1. Measures the effectiveness of the Company's affirmative action program.
2. Indicates any need for remedial action.
3. Determines the degree to which the Company's objectives are being attained.
4. Determines whether individuals with known disabilities and Vietnam Era Veterans have had the opportunity to participate in all Company-sponsored educational, training, recreational and social activities.
5. Measures the Company's compliance with the affirmative action program's specific obligations.

Where the Company finds the affirmative action program to be deficient, the Company undertakes necessary action to bring the program into compliance.

**H. RESPONSIBILITY FOR IMPLEMENTATION**  
**41 C.F.R. §§ 60-741.44(i);-250.6(h)**

**A. Corporate**

Cynthia Collins, Vice President, Strategic Operations is designated Director of the Company's affirmative action activities and has overall responsibility for the Program. She is also designated as EEO Coordinator and is responsible for implementing, monitoring, and administering the Program.

She is given top management support and the necessary staff to manage implementation of this Program. She will continue to:

1. Develop policy statements, affirmative action programs, and internal and external communication techniques including discussions with managers, supervisors and employees to ensure the Company's policies are followed.
2. Advise supervisors that they are responsible to prevent employees harassed due to their disability.
3. Identify problem areas with line management in the implementation of the Program, and develop solutions to such problems.
4. Maintain an audit and reporting system to monitor the progress of the Program.
5. Serve as liaison between the Company and the various governmental enforcement agencies, community groups and vocational rehabilitation organizations.
6. Serve as liaison between the Company and organizations for disabled persons and covered veterans.
7. Inform management of the latest developments in the affirmative action area.
8. Arrange career counseling for disabled employees and covered veterans when requested.

**B. Responsibilities of Line Managers**

Each department manager is responsible for implementation of the Affirmative Action Program within his or her area of responsibility. This includes monitoring hiring and promotion practices, identifying problem areas, and taking other actions as outlined in this Plan.

**I. TRAINING**

**41 C.F.R. §§ 60-741.44(j);-250.6(i)(3)**

The Company trains all personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes to ensure that the commitments in the Company's affirmative action program are implemented as to the disabled and Vietnam Era Veterans.

**J. DESIGN AND IMPLEMENTATION OF INTERNAL AUDIT AND REPORTING SYSTEMS**

**41 C.F.R. §§ 60-213(g), 60-2.25 (a-d)**

As stated previously, the EEO Coordinator is responsible for implementing the auditing and reporting system. He monitors this system on a quarterly basis. The reporting and auditing system provides for:

1. Maintaining and monitoring accurate and up-to-date records on all referrals, applicants, hires, promotions, transfers and terminations by race and sex to be certain that all employees are treated on a fair and equitable basis.
2. Reviewing all selection, promotional and training procedures to ensure that they are nondiscriminatory.
3. Informing, on a regular basis, top management of the effectiveness of the policy and recommendations for improvements, if necessary.

**K. POLICY OF NON-DISCRIMINATION IN SALARY ADMINISTRATION BASED ON BENEFITS RECEIVED BASED ON BENEFITS RECEIVED FOR EITHER VETERAN STATUS OF DISABILITY STATUS.**

The Company affirms that any benefits received by either Veteran or disability status are not considered when establishing the wages and benefits of any employee.