

AFFIRMATIVE ACTION PROGRAM
FOR PROTECTED VETERANS AND
INDIVIDUALS WITH DISABILITIES

Ashtabula

3300 Lake Road West
Ashtabula, OH 44004



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Contractor : Ashtabula
3300 Lake Road West
Ashtabula, OH 44004

EEO Coordinator : Pamela Fitzgerald

EQUAL EMPLOYMENT OPPORTUNITY POLICY
41 CFR Section 60-300.44(a), 41 CFR Section 60-741.44(a)

It is the policy at Ashtabula to provide equal employment and advancement opportunities to all qualified individuals. To achieve this goal, Ashtabula is dedicated to taking affirmative action to employ and advance in employment protected veterans and individuals with disabilities. All personnel actions, including compensation, benefits, recruitment, hiring, training, and promotion of persons in all job titles, are administered without regard to protected veteran or disability status, and all employment decisions are based solely on valid job requirements. In addition, employees and applicants are protected from harassment, threats, coercion, intimidation, or discrimination for:

- 1) Filing a complaint;
- 2) Assisting or participating in an investigation, compliance review, hearing, or any other activity related to the administration of Section 4212, Section 503, or any other Federal, State, or local law requiring equal opportunity for protected veteran or individuals with disabilities;
- 3) Opposing any act or practice made unlawful by Section 4212, Section 503, or any other Federal, State or local law requiring equal opportunity for protected veterans and individuals with disabilities; or
- 4) Exercising any other right protected by Section 4212, Section 503.

This EEO policy has the full support of F. Jack Witt III, Vice President of Human Resources, who has assigned responsibility for its implementation to Pamela Fitzgerald, EEO Coordinator. Ashtabula has designed and implemented an audit and reporting system to monitor and maintain its compliance with the Acts.

A copy of the Equal Employment Opportunity statement that reaffirms Ashtabula's commitment to protected veterans and individuals with disabilities is posted in a form that is accessible and understandable to an individual with a disability.

REVIEW OF PERSONNEL PROCESSES
41 CFR Section 60-300.44(b), 41 CFR Section 60-741.44(b)

Ashtabula reviews its employment procedures to ensure careful, thorough, and systematic consideration of the job qualifications of protected veterans and applicants with disabilities for job vacancies filled either by hiring or promotion, and for all training opportunities offered or available. This review ensures that personnel procedures do not stereotype protected veterans and individuals with disabilities in a manner that limits their access to all jobs for which they are qualified. Applicants and employees with disabilities have equal access to personnel processes, including those implemented through information and communication technologies. Ashtabula periodically reviews its processes, and makes any necessary modifications to ensure its affirmative action obligations are carried out. When protected veterans are considered for employment, only that portion of the individuals' military records, including discharge papers, that is relevant to the requirements of the position will be considered.

The following are some procedures that may be used to facilitate the review and evaluative process:

- 1) The application or personnel form of each protected veteran and applicant with a disability is annotated to identify each vacancy for which the applicant was considered, and is retrievable for review for use in investigations and internal compliance activities;
- 2) The application or personnel form of each protected veteran and applicant with a disability includes the identification of each promotion and training program for which that employee was considered;
- 3) When a protected veteran employee or applicant is rejected for employment, promotion, or training, a statement of the reason is appended to the personnel file;
- 4) When an employee or applicant with a disability is rejected for employment, promotion, or training, a statement of the reason is appended to the personnel file along with a description of any reasonable accommodation considered; and
- 5) When an employee or applicant is selected for hire, promotion, or training, and reasonable accommodation has been undertaken to enable the selection of an employee or applicant with a disability, the applicant form or personnel record contains a description of the reasonable accommodation.

PHYSICAL AND MENTAL QUALIFICATIONS
41 CFR Section 60-300.44(c), 41 CFR Section 60-741.44(c)

Ashtabula reviews all physical and mental job qualification requirements as openings occur to ensure, to the extent that qualification requirements tend to screen out qualified disabled veterans and qualified individuals with disabilities, that they are job-related and consistent with business necessity and the safe performance of the job.

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

REASONABLE ACCOMMODATION
41 CFR Section 60-300.44(d) , 41 CFR Section 60-741.44(d)

Ashtabula makes reasonable accommodations to the physical and mental limitations of employees or applicants to the extent that such accommodations do not impose an undue hardship on the conduct of its business. When an employee known to be a disabled veteran or an employee with a known disability has 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 employee is confidentially notified of the performance problem, and asked if the problem is related to the disability. If the employee indicates that the performance problem is related to his or her disability, the employee is asked if reasonable accommodation is needed.

HARASSMENT

41 CFR Section 60-300.44(e), 41 CFR Section 60-741.44(e)

Ashtabula develops and maintains procedures to ensure that its employees are not harassed because of their status as a protected veteran, or on the basis of a disability.

EXTERNAL DISSEMINATION OF POLICY
41 CFR Section 60-300.44(f), 41 CFR Section 60-741.44(f)

Ashtabula undertakes appropriate outreach and positive recruitment activities that are reasonably designed to effectively recruit protected veterans and individuals with disabilities, such as the following:

1) Ashtabula incorporates the Equal Opportunity Clause regarding protected veterans and individuals with disabilities in its purchase orders, leases, and contracts as required by law, executive order, and regulation. Written notification of the Equal Opportunity Policy is sent to all subcontractors, vendors, and suppliers requesting appropriate action on their part.

2) Ashtabula notifies all applicants of the EEO policy, and invites them to self-identify. Application forms state Ashtabula's commitment to equal employment opportunity. All employment advertisements and notices to recruitment sources state this EEO policy.

3) Outreach and recruitment activities that may be undertaken as needed by Ashtabula include enlisting the assistance and support of the following persons and organizations in recruiting, and developing on-the-job training opportunities for protected veterans and individuals with disabilities, in order to fulfill its commitment to provide equal employment opportunity for such individuals:

- The Local Veterans' Employment Representative in the local employment service office (One-Stop) nearest the contractor's establishment;
- The Department of Veterans Affairs Regional Office nearest the contractor's establishment;
- The veterans' counselors and coordinators ("Vet-Reps") on college campuses;
- The service officers of the national veterans' groups active in the area of the contractor's establishment;
- Local veterans' groups and veterans' service centers near the contractor's establishment;
- The National Resource Directory's Veterans Job Bank, or any future service that replaces or complements it;
- The Department of Defense Transition Assistance Program (TAP), or any subsequent program that, in whole or in part, might replace TAP; and
- 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.
- The State Vocational Rehabilitation Service Agency (SVRA), State mental health agency, or State developmental disability agency in the area of the contractor's establishment;
- The Employment One-Stop Career Center (One-Stop) or American Job Center nearest the contractor's establishment;
- The Department of Veterans Affairs Regional Office nearest the contractor's establishment (www.va.gov);
- 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);
- Local Employment Network (EN) organizations (other than the contractor, if the contractor is an EN) listed in the Social Security Administration's Ticket to Work Employment Network Directory

(www.yourtickettowork.com/endir);

- Local disability groups, organizations, or Centers for Independent Living (CIL) near the contractor's establishment;

- Placement or career offices of educational institutions that specialize in the placement of individuals with disabilities; and

- Private recruitment sources, such as professional organizations or employment placement services that specialize in the placement of individuals with disabilities.

4) All employment openings (except executive and top management, positions that are filled from within, and positions lasting three days or less) are listed at the appropriate state employment services office. Formal briefing sessions and facility tours may be conducted with representatives from recruiting sources to explain current and future job openings, position descriptions, worker specifications, and the selection process. Follow-up with these resources, and feedback on disposition of applicants are conducted when appropriate.

5) Ashtabula develops internal communication of these outreach efforts in a manner that fosters understanding, acceptance, and support among executive management, supervisors, and all other employees.

6) Meaningful contacts are established with veteran's service organizations and organizations for individuals with disabilities for such purposes as advice, technical assistance, and referral of potential employees. Such assistance may consist of advice concerning proper placement, recruitment, training, and reasonable accommodation.

7) Protected veterans and applicants with known disabilities are considered for all available positions for which they may be qualified.

8) Recruitment at educational institutions includes efforts to reach students who are protected veterans.

9) Recruitment programs established with schools incorporate efforts to reach students with disabilities. Efforts may be made to participate in work-study programs with rehabilitation facilities and schools that specialize in training or educating individuals with disabilities.

10) When appropriate, efforts may be made to participate in work-study programs with Department of Veterans Affairs rehabilitation facilities that specialize in training or educating disabled veterans.

11) Efforts are made to include individuals with disabilities when employees are pictured in consumer, promotional, or help wanted advertisements.

ASSESSMENT OF EXTERNAL OUTREACH AND RECRUITMENT EFFORTS

41 CFR Section 60-300.44(f)(3), 41 CFR Section 60-741.44(f)(3)

Ashtabula each year 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 and qualified individuals with disabilities. Each evaluation is documented, including at a minimum the criteria used to evaluate the effectiveness of each effort and the conclusion as to whether each effort and the totality of the efforts are effective. Among these criteria are the Data Collection Analysis for the current year and the two most recent previous years. If Ashtabula concludes the totality of its efforts are not effective in identifying and recruiting qualified protected veterans and qualified individuals with disabilities, alternative outreach and recruitment efforts are identified and implemented.

Ashtabula concludes that each and the totality of its efforts are effective in identifying and recruiting qualified protected veterans and qualified individuals with disabilities.

INTERNAL DISSEMINATION OF POLICY
41 CFR Section 60-300.44(g), 41 CFR Section 60-741.44(g)

Ashtabula has developed the following internal procedures to communicate its obligation to engage in affirmative action efforts to employ and advance in employment protected veterans and qualified individuals with disabilities. These procedures are designed to foster understanding, acceptance, and support among executive, management, supervisory, and other employees, and to encourage such persons to take the necessary actions to meet this obligation.

1) Ashtabula Notices. The EEO policy statement is posted on the employee bulletin board and/or electronically in a manner and place that ensures that protected veterans and individuals with disabilities are informed of its contents. This notice states the name of the EEO Coordinator, the support of top-level management toward this policy, and to whom questions, comments, or complaints should be directed. A statement is included that employees are protected from coercion, intimidation, interference, or discrimination for filing a complaint or assisting in an investigation under the Acts. All required state and federal EEO notices are also posted on bulletin boards.

2) Union Contracts. A non-discrimination clause is included in any union contracts and any such contracts are reviewed to ensure that they are non-discriminatory. Ashtabula notifies union officials and/or employee representatives of the contractor's policy, and requests their cooperation.

3) Other procedures that may be implemented as needed:

a. Ashtabula's overall commitment, top-level management support, and implementation of the plan are discussed with management personnel, making clear the chief executive officer's support for the affirmative action policy;

b. All employees and prospective employees are informed of Ashtabula's commitment to engage in affirmative action to increase employment opportunities for protected veterans and individuals with disabilities;

c. Ashtabula's affirmative action policy is publicized in the company newspaper, magazine, annual report, and other media;

d. The policy is discussed thoroughly in both employee orientation and management training programs;

e. When employees are featured in employee handbooks or similar publications for employees, Ashtabula includes protected veterans and individuals with disabilities.

AUDIT & REPORTING SYSTEM
41 CFR Section 60-300.44(h), 41 CFR Section 60-741.44(h)

Ashtabula has designed, implemented, and documented an audit and reporting system that:

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

Where the affirmative action program is found to be deficient, corrective action is taken to bring the program into compliance.

RESPONSIBILITY FOR IMPLEMENTATION
41 CFR Section 60-300.44(i), 41 CFR Section 60-741.44(i)

Pamela Fitzgerald has been designated to direct the activities of the affirmative action program. Pamela Fitzgerald has the full support of F. Jack Witt III in carrying out the Ashtabula affirmative action policy. Pamela Fitzgerald is responsible for:

- 1) Developing policy statements, affirmative action programs, and internal and external communication to include discussions with managers, supervisors, and employees to ensure the policies are followed;
- 2) Advising managers and supervisors that their work performance is evaluated, in part, on the basis of their affirmative action efforts;
- 3) Identifying and discussing with management any problem areas;
- 4) Developing with management solutions for any identified problem areas;
- 5) Serving as a liaison between Ashtabula and community groups, governmental agencies, and vocational rehabilitation organizations;
- 6) Maintaining an audit and reporting system to monitor the progress of the affirmative action program;
- 7) Informing management of the latest developments in the affirmative action and equal employment opportunity area;
- 8) Serving as a liaison between Ashtabula and organizations for protected veterans and individuals with disabilities;
- 9) Assisting in career counseling for protected veterans employees and employees with disabilities;
- 10) Ensuring that the policy statement and required posters are posted on bulletin boards and/or electronic postings; and
- 11) Ensuring that employees placed through these policies are not harassed.

TRAINING

41 CFR Section 60-300.44(j), 41 CFR Section 60-741.44(j)

All personnel involved in recruitment, screening, selection, promotion, discipline, and related processes are trained to ensure the implementation of our commitments made in this affirmative action program.

DATA COLLECTION ANALYSIS
41 CFR Section 60-300.44(k), 41 CFR Section 60-741.44(k)

Ashtabula 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 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;
- 3) The total number of job openings and total number of jobs filled;
- 4) The total number of applicants for all jobs;
- 5) The number of protected veteran applicants hired;
- 6) The number of applicants with disabilities hired; and
- 7) The total number of applicants hired.

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Data Collection Analysis

(Total Workforce)

11/01/2016 - 10/31/2017

		Applicants	Applicant Ratio	Hires & Promotions	Hire & Promo Ratio	Total Openings	Total Jobs Filled	Jobs Filled Ratio
Total Workforce	Veterans	2	1.2%	0	0.0%			
	Disabled	2	1.2%	0	0.0%			
	Total	164		15		23	15	65.2%

The Company has used the terminology in this report in an effort to comply with governmental affirmative action regulations and has prepared these statistics in compliance with such regulations. They have no legal or factual significance outside the context of this Affirmative Action Program and in no way suggest any wrong doing by the Company.

BENCHMARKS FOR HIRING VETERANS

41 CFR Section 60-300.45

Benchmarks are set on an annual basis using one of the two mechanisms described below:

- 1) Establish a benchmark equaling the national percentage of veterans in the civilian labor force, which will be published and updated annually on the OFCCP website; or
- 2) Establish a benchmark by taking into account: (i) the average percentage of veterans in the civilian labor force in the State(s) where the contractor is located over the preceding three years, as calculated by the Bureau of Labor Statistics and published on the OFCCP website; (ii) the number of veterans, over the previous four quarters, who were participants in the employment service delivery system in the State where the contractor is located, as tabulated by the Veterans' Employment and Training Service and published on the OFCCP website; (iii) the applicant ratio and hiring ratio for the previous year, based on the data collected pursuant to § 60-300.44(k); (iv) the contractor's recent assessments of the effectiveness of its external outreach and recruitment efforts, as set forth in § 60-300.44(f)(3); and (v) any other factors, including but not limited to the nature of the contractor's job openings and/or its location, which would tend to affect the availability of qualified protected veterans.

Ashtabula has chosen to establish a benchmark equaling the national percentage of veterans in the civilian labor force. The benchmark is not a rigid and inflexible quota that must be met, nor is it to be considered either a ceiling or a floor for the employment of particular groups. The purpose of establishing benchmarks is to create a quantifiable method by which Ashtabula can measure its progress toward achieving equal employment opportunity for protected veterans.

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Hiring Benchmark for Protected Veterans

41 CFR Section 60-300.45

Veteran Hiring Benchmark : 6.7%

The Company has used the term 'Benchmark' herein as referenced by government affirmative action regulations and has selected statistics for these analyses in compliance with such regulations. The use of such term and statistics does not indicate the Company's agreement that the sources of statistics are the most relevant. The terms have no legal or factual significance outside the context of this Affirmative Action Program and in no way suggest any wrong doing by the Company.

UTILIZATION GOALS FOR INDIVIDUALS WITH DISABILITIES

41 CFR Section 60-741.45

The OFCCP establishes a utilization goal for employment of qualified Individuals with disabilities for each job group in the contractor's workforce, or for the contractor's entire workforce where the workforce consists of 100 or less employees. The utilization goal is not a rigid and inflexible quota that must be met, nor is it to be considered either a ceiling or a floor for the employment of particular groups. The purpose of the utilization goal is to establish a benchmark against which the contractor must measure the representation of individuals within each job group in its workforce, or within the contractor's entire workforce. Ashtabula evaluates its utilization of individuals with disabilities in each job group, or in its entire workforce.

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Utilization Summary of Individuals with Disabilities

(By Job Group using the Any Difference Rule)

41 CFR Section 60-741.45

	Employees	Disabled	Disabled Availability %	Disabled Utilization %	Met Goal?
1C : Upper Lvl Mgr - Deans/Asc/Asst	2	0	7.0	0.0	No
1D : Upper Lvl Mgr - Chairs/Dir	13	0	7.0	0.0	No
1E : Lower Level Manager	1	0	7.0	0.0	No
2A : Professors	2	0	7.0	0.0	No
2B : Associate Professor	15	0	7.0	0.0	No
2C : Assistant Professor	7	0	7.0	0.0	No
2D : Instructors/Adjuncts	70	6	7.0	8.6	Yes
3A : Upper Level Professional	4	1	7.0	25.0	Yes
3B : Lower Level Professional	20	0	7.0	0.0	No
4A : Upper Level Clerical	2	0	7.0	0.0	No
4B : Mid Level Clerical	10	0	7.0	0.0	No
5A : Technician/Other Specialty	1	0	7.0	0.0	No
5C : Technician/Elec/Data Proces	1	0	7.0	0.0	No

The Company has used the terms 'Availability' and 'Utilization' herein as referenced by government affirmative action regulations and has selected statistics for these analyses in compliance with such regulations. The use of such terms and statistics does not indicate the Company's agreement that the sources of statistics are the most relevant. The terms have no legal or factual significance outside the context of this Affirmative Action Program and in no way suggest any wrong doing by the Company.

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Utilization Summary of Individuals with Disabilities

(By Job Group using the Any Difference Rule)

41 CFR Section 60-741.45

	Employees	Disabled	Disabled Availability %	Disabled Utilization %	Met Goal?
7B : Service/Maint: Cust/Maint/Repr	4	0	7.0	0.0	No
7C : Service/Maint: Protective Serv	1	0	7.0	0.0	No

The Company has used the terms 'Availability' and 'Utilization' herein as referenced by government affirmative action regulations and has selected statistics for these analyses in compliance with such regulations. The use of such terms and statistics does not indicate the Company's agreement that the sources of statistics are the most relevant. The terms have no legal or factual significance outside the context of this Affirmative Action Program and in no way suggest any wrong doing by the Company.

IDENTIFICATION OF PROBLEM AREAS

41 CFR Section 60-741.45(e)

When the percentage of individuals with disabilities in one or more job groups, or in our entire workforce if the workforce is 100 or less employees, is less than the utilization goal, Ashtabula takes steps to determine whether and where impediments to equal employment opportunity exist. When making this determination, we assess our personnel processes, the effectiveness of our outreach and recruitment efforts, the results of our affirmative action program audit, and any other areas that might affect the success of the affirmative action program.

Ashtabula has not found any impediments to equal employment opportunity in our personnel processes, outreach, and recruitment efforts or any other area that might affect the success of our affirmative action program.

ACTION ORIENTED PROGRAMS

41 CFR Section 60-741.45(f)

As needed, Ashtabula develops action-oriented programs designed to correct any identified problems 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, and/or other actions designed to correct the identified problem areas and attain the established goal.

Ashtabula has not identified any problems areas.