



HR-9250

Affirmative Action
Program (AAP) - Section
503

(January 1, 2019 to December 31, 2024)

		DATE
ORIGINATOR	Kara McCormick	2/24/19
ENGINEERING	Thomas Reed	2/24/19
MANUFACTURING	David Palotas	2/24/19
QUALITY	Camille Thompson	2/24/19

CONFIDENTIALITY, REVISION HISTORY, & COPYRIGHT

CONFIDENTIALITY

The information contained herein is considered confidential and should only be viewed by Bliley Technologies, Inc. employees and only external resources permitted by the company. If you have received this document in error please disregard, terminate, or destroy this document immediately. Failure to do so can result in legal actions. If you have any questions please contact Bliley Technologies, Inc. at +1 (814) 838-3571 or by email at connect@Bliley.com.

REVISION HISTORY

Date	Rev	Description	Author
October 3, 2018	-	Initial Draft	Camille Thompson
February 23, 2019	1	2019 Data	Kara McCormick

COPYRIGHT

© Copyright 2019 Bliley Technologies, Inc. All Rights Reserved. All content within this document is subject to U.S. and International copyright laws.

TABLE OF CONTENTS

CONFIDENTIALITY, REVISION HISTORY, & COPYRIGHT 2

CONFIDENTIALITY 2

REVISION HISTORY 2

COPYRIGHT 2

TABLE OF FIGURES 5

TABLE OF TABLES 5

1. INTRODUCTION 6

1.1 SCOPE 6

1.2 DEFINITION OF DISABILITY FROM SECTION 503 6

2. REVIEW OF PERSONNEL PROCESSES [41 CFR 60-741.44(B)] 7

2.1 ENSURE ACCESSIBILITY OF PERSONNEL PROCESSES 7

2.2 PRE OFFER VOLUNTARILY SELF-IDENTIFICATION 7

2.3 5 YEAR EMPLOYEE SELF-IDENTIFICATION 8

2.4 5 MODIFY APPLICANT FLOW LOGS 8

2.5 5 OUTREACH AND RECRUITMENT 8

3. REVIEW OF PHYSICAL AND MENTAL JOB QUALIFICATION STANDARDS [41 CFR 60-741.44(C)] 9

4. REASONABLE ACCOMMODATION [41 CFR 60-741.44(D)] 9

5. ANTI-HARASSMENT PROCEDURES [41 CFR 60-741.44(E)] 10

6. EXTERNAL DISSEMINATION OF POLICY [41 CFR 60-741.44(F)] 10

7. OUTREACH AND POSITIVE RECRUITMENT [41 CFR 60-741.44(F)] 11

7.1 5 BLILEY'S OUTREACH AND POSITIVE RECRUITMENT ACTIVITIES 11

7.2 5 FUTURE ASSESSMENT OF EXTERNAL OUTREACH AND RECRUITMENT EFFORTS [41 CFR 60-741.44(F)(3)] 11

8. INTERNAL DISSEMINATION OF POLICY [41 CFR 60-741.44(G)] 12

9. AUDIT AND REPORTING SYSTEM [41 CFR 60-741.44(H)] 12

10. APPLICABLE DOCUMENTS 13

11. ACRONYMS 13

12. REVISION HISTORY 14

12.1 REVISIONS 14

TABLE OF FIGURES

Figure 1: Outreach and Positive Recruitment Assessment 11

TABLE OF TABLES

None

1. INTRODUCTION

It is the policy of Bliley Technologies, Inc. to attract and retain the best qualified people available without regard to race, color, religion, national origin, gender, sexual orientation, gender identity, age, physical or mental disability, or veteran status. Our nondiscrimination policy applies to applicants as well as employees and covers all terms and conditions of employment, including recruiting, hiring, transfers, promotions, terminations, compensation and benefits. Discrimination or harassment based on any of the above factors is prohibited, as is retaliation against a person who has made a complaint or given information regarding possible violations of this policy.

1.1 SCOPE

The Section 503 regulations set forth the standards for compliance with section 503 of the Rehabilitation Act of 1973, as amended (29 U.S.C. 793), which prohibits discrimination against individuals with disabilities and requires Government contractors and subcontractors to take affirmative action to employ and advance in employment qualified individuals with disabilities. [60.741.1]

1.2 DEFINITION OF DISABILITY FROM SECTION 503

The term disability means, with respect to an individual:

- (i) A physical or mental impairment that substantially limits one or more major life activities of such individual;
- (ii) A record of such an impairment; or
- (iii) Being regarded as having such an impairment.

General purpose of Section 503's Subpart C, Affirmative Action Program:

An affirmative action program is a management tool designed to ensure equal employment opportunity and foster employment opportunities for individuals with disabilities. An affirmative action program institutionalizes the contractor's commitment to equality in every aspect of employment and is more than a paperwork exercise. An affirmative action program is dynamic in nature and includes measurable objectives, quantitative analyses, and internal auditing and reporting systems that measure the contractor's progress toward achieving equal employment opportunity for individuals with disabilities.

Applicability of Section 503 Regulation in General and Subpart C, Affirmative Action Program Requirements in Particular:

The Section 503 regulations apply to all government contracts and subcontracts in excess of \$15,000 for the purchase, sale or use of personal property or non-personal services (including construction, but not federally assisted construction). [60-741.1 (b)]

The requirements of Subpart C of the Section 503 rule pertaining to written affirmative action program requirements apply to every government contractor

that has 50 or more employees and a federal contract of \$50,000 or more. [60-741.40(b)]

2. REVIEW OF PERSONNEL PROCESSES [41 CFR 60-741.44(B)]

To comply with the requirement to “periodically review” its personnel processes, Bliley reviews its personnel processes annually to determine whether its present procedures assure careful, thorough, and systematic consideration of the qualifications of known individuals with disabilities. As part of this review, Bliley also ensures that its personnel processes do not stereotype individuals with disabilities in a manner, which limits their access to all jobs for which they are qualified. This review covers all procedures related to the filling of job vacancies either by hire or by promotion, as well as to all training opportunities offered or made available to employees.

Based upon Bliley's most recent review of its personnel processes, Bliley has implemented the following modifications to its personnel processes to come into compliance:

2.1 ENSURE ACCESSIBILITY OF PERSONNEL PROCESSES

Bliley will ensure that applicants and employees who are individuals with disabilities have equal access to all of its personnel processes. Although it is not required to do so, as a best practice in furtherance of that commitment, Bliley is in the process of making its job application, time and attendance, and employee benefits electronic systems conform to the Web Content Accessibility Guidelines (WCAG 2.0) promulgated by the World Wide Web Consortium Web Accessibility Initiative and will complete these upgrades by December 31, 2019. Bliley believes that taking these steps now will help minimize the need for future reasonable accommodations and facilitate ready access to key systems for many applicants and employees with disabilities. Also, as part of the upgrading of our job application system, Bliley will ensure that human resources office contact information is prominently displayed to facilitate requests for reasonable accommodation from applicants with disabilities.

2.2 PRE OFFER VOLUNTARILY SELF-IDENTIFICATION

On March 1, 2019, Bliley began inviting all applicants to voluntarily inform Bliley whether they are individuals with disabilities before an offer of employment is made in compliance with 41 CFR 61-741.42(a) using the form prescribed by OFCCP. Bliley provides the self-id form prescribed by OFCCP to all applicants along with Bliley's required paper application forms. Additionally, Bliley has modified its electronic application system and created a fillable copy of the required self-id form using the parameters outlined by OFCCP in its FAQs. Bliley also created a separate electronic file where it stores all self-id information separate from employment applications, personnel records, and employee medical files. Bliley also continues to invite applicants to voluntarily self-identify as individuals with disabilities after a job offer has been made, but before the applicant begins work, in compliance with 41 CFR 61- 741.42(b). Bliley uses the form prescribed by OFCCP to invite this post-offer self-identification, and stores all self-id responses in the separate electronic file created for this purpose.

2.3 5 YEAR EMPLOYEE SELF-IDENTIFICATION

In compliance with 41 CFR 60-741.42(c), Bliley invites all of its current employees to voluntarily inform Bliley whether they are individuals with disabilities via an annual all-hands communication meeting by March 31, 2019, and will do so every five years thereafter. An email will be sent after the meeting that contains a link to the electronic self-id form, and also a paper self-id forms will be given to everyone at the meeting to be filled out and returned to the Finance department. Employees are asked to reply with 10 business days. Bliley will also remind employees via email and other internal communications three years after the most recent invitation that they can voluntarily update their disability status with Bliley at any time. The next reminder will be sent to employees on March 1, 2022, and the next all-employee invitation to self-identify is scheduled by March 31, 2024.

2.4 5 MODIFY APPLICANT FLOW LOGS

Bliley recognizes that it must collect applicant and hiring data to comply with the requirements of 41 CFR 60-741.44(k). In order to facilitate the accurate tracking of applicant and hiring data for individuals with disabilities, Bliley has modified its applicant flow logs accordingly. Applicant flow logs will be maintained confidentially.

2.5 5 OUTREACH AND RECRUITMENT

Bliley engages in positive outreach and recruitment for individuals with disabilities, as required by OFCCP regulations. Bliley has begun documenting each outreach and recruitment activity to comply with the requirements of the new Section 503 regulations, and will conduct an annual assessment to evaluate the effectiveness of the totality of our outreach and recruitment efforts, as required by 41 CFR 60-741.44(f)(3)). Bliley will institute procedures to comply with the requirements of this part and will conduct its first annual assessment with data collected during the 2019 AAP year, starting in 2020.

Bliley will evaluate the results of each outreach and recruitment activity using the following criteria, which includes data collected under 41 CFR 60-741.44(k), to see if it is producing measurable results:

1. To what extent did the activity attract qualified applicants with disabilities?
2. To what extent did the activity result in the hiring of qualified individuals with disabilities?
3. To what extent did the activity expand Bliley's outreach to individuals with disabilities in the community?
4. To what extent did the activity increase Bliley's capacity/capability to include individuals with disabilities in its workforce?

Bliley will utilize the same criteria to conduct its annual assessment of the totality of its outreach and recruitment efforts. If Bliley concludes that the totality of its efforts were not effective in identifying and recruiting qualified individuals with disabilities, Bliley will explore and implement alternative outreach and recruitment methods. Bliley will

document its outreach and recruitment activities and its assessments of these activities, and retain these documents for three years.

3. REVIEW OF PHYSICAL AND MENTAL JOB QUALIFICATION STANDARDS [41 CFR 60-741.44(C)]

To comply with the requirement to “periodically review” its physical and mental job qualification standards, Bliley reviews the physical and mental job qualifications of each job opening before it is publicly posted to ensure that, to the extent that such qualification requirements tend to screen out qualified individuals with disabilities, they are related to the job(s) in question and consistent with business necessity and the safe performance of the job. Bliley also conducts a periodic review of all job qualification standards every three years (except for those job qualification standards that Bliley has reviewed within the previous twelve months) to ensure that, to the extent that such qualification requirements tend to screen out qualified individuals with disabilities, they are job-related and consistent with business necessity. The last review was completed on February 25, 2019.

The review is conducted to validate that no physical or mental job qualification requirements are likely to screen out qualified individuals with disabilities. Nevertheless, to ensure our compliance, Bliley strives to use only job qualification standards that are job-related and consistent with business necessity. The review found all job qualification requirements to be job-related and consistent with business necessity.

Bliley will continue to review physical and mental job qualification requirements whenever a job vacancy will be filled through either hiring or promotion and will conduct a qualifications review whenever job duties change.

No pre-employment physical examinations or medical questionnaires are used in Bliley's hiring process.

If at any time in the future, Bliley should inquire into an applicant's physical or mental condition or should require the conduct of a medical examination, Bliley affirms that such inquiries or exams will be conducted in accordance with the Section 503 regulations and that information obtained as a result of the inquiry or exam will be kept confidential, except as otherwise provided for in the Section 503 regulations. The results of the examination or inquiry will only be used in accordance with the Section 503 regulations.

4. REASONABLE ACCOMMODATION [41 CFR 60-741.44(D)]

Bliley will continue its longstanding commitment to making reasonable accommodation to the known physical or mental limitations of qualified individuals with disabilities unless such accommodation would impose an undue hardship on the conduct of its business. Bliley also commits to engaging in an interactive process with the person requesting the accommodation (or their representative), as needed, to determine an appropriate accommodation. Undue hardship will be determined by assessing whether the

requested accommodation, and any other potential accommodations, would cause significant difficulty or expense, as provided for in the Section 503 regulations.

When 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 problems are related to his or her disability, the employee is asked if reasonable accommodation is needed.

Bliley will also ensure that all requests for reasonable accommodation and any medical or disability- related information provided to Bliley will be treated as confidential medical records and maintained in a separate file.

Because Bliley strives to be a model employer, it is currently drafting reasonable accommodation procedures using the optional guidance in Appendix B of 41 CFR Part 60-741.

5. ANTI-HARASSMENT PROCEDURES [41 CFR 60-741.44(E)]

Employees and applicants of Bliley will not be subject to harassment because of disability. Any employee or applicant who believes that they have been subject to harassment because of their disability should promptly contact a manager in their chain of command, or promptly contact our Administrator at (814) 838-3571 extension 228 for assistance. Employees or applicants may also file a written complaint with the Finance Department at HR@bliley.com.

Retaliation, including intimidation, threat, coercion, or discrimination, against an employee or applicant because they have objected to discrimination, engaged or may engage in filing a complaint, assisted in a review, investigation, or hearing or have otherwise sought to obtain their legal rights under any Federal, State, or local EEO law regarding individuals with disabilities is prohibited. Any employee or applicant who believes that he or she has been subject to retaliation should contact our Administrator at (814) 838-3571 extension 228 for assistance. Employees or applicants may also file a written complaint with the Finance Department at HR@bliley.com.

This anti-harassment policy is communicated to all employees and managers annually via e-mail and paper memo, most recently on March 4, 2019, and a notice is posted on the bulletin boards.

Additionally, training is provided annually on the identification and prevention of harassment based on disability to all of Bliley's employees. Furthermore, Bliley monitors its environment for the presence of any forms of harassment, intimidation, or coercion and, where warranted, takes corrective action.

6. EXTERNAL DISSEMINATION OF POLICY [41 CFR 60-741.44(F)]

Bliley provided written notification of Bliley's Equal Employment Opportunity and Affirmative Action policy regarding the employment of qualified individuals with disabilities to all current subcontractors, vendors, and suppliers on March 4, 2019 and will continue to do so on an annual basis. Bliley will also provide such written notification to new subcontractors, vendors, and suppliers upon entering into a relationship with them.

Bliley has informed its recruiting sources, including State employment agencies, educational institutions and social service agencies; of the company's policy concerning the employment of qualified individuals with disabilities and will notify them of employment opportunities as they become available. Bliley requested all recruiting sources to actively recruit and refer qualified persons for job opportunities.

7. OUTREACH AND POSITIVE RECRUITMENT [41 CFR 60-741.44(F)]

7.1 5 BLILEY'S OUTREACH AND POSITIVE RECRUITMENT ACTIVITIES

Outreach/Recruitment Activity	Date of Activity	Description	Evaluation of Each Activity
Research local services with the Erie Chamber of Commerce	By March 31, 2019	Will identify the local service agencies and provide links to our job postings	
Adding EEO and IWD statements within the Job postings	Recurring	Add statements	Complete on template
Assessment of Effectiveness of Totality of Outreach/Recruitment Efforts:			
<p>Criteria for Evaluation:</p> <ol style="list-style-type: none"> To what extent did the activity attract qualified applicants with disabilities? To what extent did the activity result in the hiring of qualified individuals with disabilities? To what extent did the activity expand Bliley's outreach to individuals with disabilities in the community? To what extent did the activity increase Bliley's capacity/capability to include individuals with disabilities in its applicant pool and workforce? 			

Figure 1: Outreach and Positive Recruitment Assessment

7.2 5 FUTURE ASSESSMENT OF EXTERNAL OUTREACH AND RECRUITMENT EFFORTS [41 CFR 60-741.44(F) (3)]

Bliley will begin assessing its outreach and recruitment efforts annually, using the above stated evaluation criteria, starting in 2019 and will document such assessment for inclusion in Bliley's 2020 AAP. This will include an assessment of the effectiveness of each individual effort, as well as an assessment of the effectiveness of the totality of our efforts for the year. Because Bliley currently has limited applicant and hiring data for individuals

with disabilities, which it began collecting March 1, 2019, we can only perform a limited assessment of the effectiveness of our outreach and recruitment efforts at this time. Starting in 2019, Bliley will have more complete data from which to perform a comprehensive assessment of whether our efforts are effective in recruiting individuals with disabilities into its workforce. Bliley documents all of its outreach and recruitment efforts and maintains these documents, including the written assessments of the effectiveness of these efforts, for three years, in accordance with 41 CFR 60-741.44(f)(4).

8. INTERNAL DISSEMINATION OF POLICY [41 CFR 60-741.44(G)]

Bliley has developed internal procedures to communicate its obligation to engage in affirmative action efforts to employ and advance in employment-qualified individuals with disabilities. Bliley's procedures are designed to foster understanding, acceptance, and support among all employees and to encourage them to help Bliley meet this obligation.

Bliley makes copies of its AAP available for inspection to any employee or applicant upon request. Bliley also incorporates the company's affirmative action and equal employment opportunity policies into the Bliley Employee Handbook (HR-9000) and updates this manual as needed. The policies are emailed to all employees annually and discussed in employee orientation programs, such as Bliley's New Employee On-boarding process. Additionally, Bliley's affirmative action policy and EEO poster are placed on bulletin boards located throughout Bliley's facilities and office work areas, and electronic versions of these notices are posted and clearly labeled on Bliley's company-wide intranet. A clearly labeled link to an electronic version of the EEO poster is also included in Bliley's electronic job application website.

Bliley managers and supervisors are provided with affirmative action and EEO training upon taking their management roles and are briefed annually on these policies. The last such management briefing was held on March 8, 2019.

9. AUDIT AND REPORTING SYSTEM [41 CFR 60-741.44(H)]

The Bliley Finance Manager has the responsibility for developing and preparing the formal documents of the AAP. The Finance Manager is responsible for the effective implementation of the AAP; however, responsibility is likewise vested with each department manager and supervisor.

Bliley conducts an annual audit of personnel activities to ensure such activities are free from discrimination against or stereotyping of individuals with disabilities in any manner. The results of Bliley's most recent self-audit are stored within our QMS system. During the self-audit, the following activities were reviewed:

- Recruitment, advertising, and job application procedures;
- Implementation of hiring, promotion, upgrading, award of tenure, layoff, and recall from layoff practices;
- Rates of pay and any other forms of compensation including fringe benefits;

- Job assignments, job qualifications, job descriptions, and seniority lists;
- Implementation of reasonable accommodation policies and procedures;
- Awarding of sick leave, leaves or absence, or implementation of any other leave policies;
- Participation in training, mentoring, or apprenticeship programs, and attendance at professional meetings/conferences; and
- Application of any other term, condition, or privilege of employment, including participation in company-sponsored educational, training, recreational, and social activities.

The CEO has also directed the Finance Manager to submit a annual report documenting Bliley's efforts to comply with its EEO/AAP Responsibilities, discussing any identified EEO/AAP problem areas along with recommended remedial actions, and providing an update regarding the status of Bliley's AAP objectives. Managers and supervisors are asked to report any current or foreseeable EEO problem areas to the Finance Manager and are asked to outline their suggestions or recommendations for solutions.

The following documents are maintained as a component of Bliley's internal audit:

1. Documentation of self-audit;
2. Summary data of personnel activity including external job offers and hires, promotions, resignations, terminations, and layoffs by job group relating to individuals with disabilities (withheld from distribution or public inspection to protect confidentiality); and
3. An applicant flow log showing the name, race, ethnicity, sex, disability status, date of application, job title, interview status and the action taken for all individuals applying for job opportunities (withheld from distribution or public inspection to protect confidentiality).

10. APPLICABLE DOCUMENTS

HR-9200	Performance Management Process
HR-9050	Affirmative Action Program Plan
HR-9001F	Job Application
HR-9201F	Employee Growth Plan
HR-9000	Employee Handbook
HR-9251F	Internal Self-Identification

11. ACRONYMS

AAP	Affirmative Action Program
EEO	Equal Employment Opportunity
CEO	Chief Executive Officer
QA	Quality Assurance
QMS	Quality Management System
OFCCP	Office of Federal Contract Compliance Programs

12. REVISION HISTORY

12.1 REVISIONS

Rev Level	Revision	Rev Date	Revised By
A			