

# **AFFIRMATIVE ACTION POLICY FOR EQUAL EMPLOYMENT OPPORTUNITY**

**JMC** J.M. Crawford & Associates  
Consulting Engineers

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# AFFIRMATIVE ACTION POLICY FOR EQUAL EMPLOYMENT OPPORTUNITY

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## **EQUAL EMPLOYMENT OPPORTUNITY/AFFIRMATIVE ACTION POLICY**

It is the policy of J.M. CRAWFORD & ASSOCIATES, INC. CONSULTING ENGINEERS to assure that all applicants for employment and all employees are treated on a fair and equitable basis without regard to their race, religion, sex, color, handicap, natural origin or age.

Such action shall include employment, promotion, demotion, recruitment or recruitment advertising, layoff or termination, rates of pay and other forms of compensation, and selection for training, whether apprenticeship and/or on-the-job training.

Furthermore, this company agrees to make special recruitment efforts to hire the protected class whenever feasible. This company also agrees to adhere to all applicable federal, state, and local laws relating to Equal Employment Opportunity for all individuals.

Joseph Hodskins has been appointed Equal Employment Compliance (EEOC) Officer and shall be available for counseling, answering questions in regards to this company policy, and to hear any complaints of discrimination. The EEOC Officer may be reached by calling (859) 263-4399.

***J.M. CRAWFORD & ASSOCIATES, INC.***

  
\_\_\_\_\_  
*Joseph H. Hodskins, President*

*March 25, 2014*  
\_\_\_\_\_  
*Date*

# DISSEMINATION OF POLICY

Our equal employment opportunity policy is and will continue to be presented to all relevant parties within and outside the firm. Our policy is conveyed in our personnel policy and manual; by discussions in staff meetings with employees; by EEO statements on bulletin boards; in newspaper advertisements when advertising for employees; by policy statements to public employment agencies, when used; and to our local vocational and area high schools when recruiting employees. Our policy will also be discussed in employee orientation programs.

# IMPLEMENTATION OF POLICY

Joseph Hodskins has been appointed Equal Employment Compliance Officer and is in charge of implementing the firm's Affirmative Action Policy and Equal Employment Opportunity program. He will continually monitor the selection, placement, transfer and promotion procedures to ensure that all employees or applicants are considered without regard to race, creed, sex, religion, national origin or age (40-70).

J.M. Crawford & Associates will:

- 1) Maintain an up-to-date written non-discrimination policy. All employees are given a Company Policy Manual indicating our Equal Employment Opportunity program and Affirmative Action Policy. This Company Policy Manual includes a form to be signed by the employee showing they have read the manual and are aware of our policies.
- 2) Designate a capable responsible employee to supervise and review the Equal Opportunity Program.
- 3) Include all advertisements for personnel the statement that the organization is an "Equal Opportunity Employer."
- 4) Recruit employees through public and private referral agencies with ability to provide qualified minority group applicants as permitted under labor agreements.
- 5) Accept applicants solely on their basis to perform the actual job task.
- 6) Maintain a record of minority group employees and report employment activity when requested.
- 7) Notify present employees of higher skilled vacancies and solicit their applications without discrimination.
- 8) Periodically evaluate the spread of wages paid within each classification to determine any evidence of discrimination in wage practice.
- 9) Include minority group employees in on-the-job and apprenticeship training programs.

- 10) J.M. Crawford & Associates will use their best efforts to utilize minority group subcontractors or subcontractors with meaningful minority group representation among their employees. We will use our best efforts to insure subcontractors' compliance with their equal employment opportunity obligations. Subcontractors will be required to sign an Equal Employment Opportunity Agreement as part of their contract. This agreement, stating they comply with all federal, state and local laws regarding Affirmative Action, along with a Work Force Analysis must be signed and returned before beginning work on a project.
- 11) Maintain a record of affirmative action efforts and accomplishments.
- 12) J.M. Crawford & Associates will periodically review selected personnel actions in depth to determine whether there is evidence of discrimination. Where evidence is found, we will promptly take corrective action.
- 13) J.M. Crawford & Associates will investigate all complaints of alleged discrimination, attempt to resolve such complaints, and will take appropriate corrective action.

# PROBLEM AREAS AND CORRECTIVE ACTION

J.M. Crawford & Associates is committed to our goals of achieving a more diverse group of applicants for employment openings and to having more minority and female opportunities within our company. As per the 2006-2010 Equal Employment Opportunity Tabulation Report (see page 6 & 7) produced by the United States Census Bureau, the following information shows:

- 1) The available minority Civil Engineers in our area is 35% of the workforce.
- 2) The available minority Engineering Technicians in our area is 17% of the workforce.

J.M. Crawford & Associates is a small firm. We have almost no turnover of employees. Two of our engineers have been employed for a minimum of 38 years with our most recent engineer employed for 15 years. Our technicians have been employed for a minimum of 25 years. Our current Minority/Female Utilization is 14%.

Due to the relatively small percentage of minority Engineering Technicians (17%) available, recruiting applicants for any future openings will be difficult. The availability of minority Civil Engineers (35%) however, make it more likely that future open positions will receive minority applicants.

Our recruitment efforts will stipulate that minority, women and older workers be actively recruited as candidates for all positions and will include advertising job openings with:

- 1) the Department for Employment Services,
- 2) the University of Kentucky (STEPS and Career Planning),
- 3) area vocational and high schools
- 4) any local minority or female professional organizations, and
- 5) the local newspaper.

Present minority and women employees will also be asked to refer friends for job vacancies.

All recruitment efforts will include our Equal Employment Opportunity Policy stating that we fully comply with the provisions of Title VI of the Civil Rights Act of 1964 and all advertisements will include the notation: *"An Equal Opportunity Employer."*

The EEO Tabulation is sponsored by four Federal agencies consisting of the Equal Employment Opportunity Commission (EEOC), the Employment Litigation Section of the Civil Rights Division at the Department of Justice (DOJ), the Office of Federal Contract Compliance Programs (OFCCP) at the Department of Labor, and the Office of Personnel Management (OPM).

Occupation Code	Subject	Total, race and ethnicity		Not Hispanic or Latino, one race							Not Hispanic or Latino, two or more races							Balance of not Hispanic or
		White alone Hispanic or Latino	All other Hispanic or Latino	White alone	Black or African American alone	American Indian and Alaska Native alone	Asian alone	Native Hawaiian and Other Pacific Islander alone	White and Black	White and AIAN	White and Asian	Black and AIAN	NIHPI and White (Hawaii only)	NIHPI and Asian (Hawaii only)	NIHPI and Asian and White (Hawaii only)			
Civil engineers 1380 (SOC 17-2051)	Total, both sexes	430	0	370	20	0	40	0	0	0	0	0	0	0	0	0	0	
	Number	100.0%	0.0%	86.0%	4.7%	0.0%	9.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	
	Male	330	0	285	20	0	30	0	0	0	0	0	0	0	0	0	0	
	Female	95	0	80	0	0	10	0	0	0	0	0	0	0	0	0	0	
		22.1%	0.0%	20.9%	0.0%	0.0%	2.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	

Data are based on a sample and are subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error. The value shown here is the 90 percent margin of error. The margin of error can be interpreted roughly as providing a 90 percent probability that the interval defined by the estimate minus the margin of error and the estimate plus the margin of error (the lower and upper confidence bounds) contains the true value. In addition to sampling variability, the ACS estimates are subject to nonsampling error (for a discussion of nonsampling variability, see Accuracy of the Data). The effect of nonsampling error is not represented in these tables.

Source: U.S. Census Bureau, 2006-2010 American Community Survey

Explanation of Symbols:

- An "x" entry in the margin of error column indicates that either no sample observations or too few sample observations were available to compute a standard error and thus the margin of error. A statistical test is not appropriate.
- An "." entry in the estimate column indicates that either no sample observations or too few sample observations were available to compute an estimate, or a ratio of medians cannot be calculated because one or both of the median estimates falls in the lowest interval or upper interval of an open-ended distribution.
- An "-" following a median estimate means the median falls in the lowest interval of an open-ended distribution.
- An "+" following a median estimate means the median falls in the upper interval of an open-ended distribution.
- An "\*\*\*\*" entry in the margin of error column indicates that the median falls in the lowest interval or upper interval of an open-ended distribution. A statistical test is not appropriate.
- An "N" entry in the estimate and margin of error columns indicates that data for this geographic area cannot be displayed because the number of sample cases is too small.
- An "(X)" means that the estimate is not applicable or not available.

The U.S. Census Bureau collects race data in accordance with guidelines provided by the U.S. Office of Management and Budget (OMB). Except for the total, all race and ethnicity categories are mutually exclusive. "Black" refers to Black or African American; "AIAN" refers to American Indian and Alaska Native; and "NIHPI" refers to Native Hawaiian and Other Pacific Islander. The reference to "Hawaii only" indicates that these columns are only tabulated for areas in the state of Hawaii. "Balance of Not Hispanic or Latino" includes the balance of non-Hispanic individuals who reported multiple races or reported Some Other Race alone. For more information on race and Hispanic origin, see the Subject Definitions at [http://www.census.gov/acs/www/data\\_documentation/documentation\\_main/](http://www.census.gov/acs/www/data_documentation/documentation_main/). Race and Hispanic origin are separate concepts on the American Community Survey. "White alone Hispanic or Latino" includes respondents who reported Hispanic or Latino origin and reported race as "White" and no other race. "All other Hispanic or Latino" includes respondents who reported Hispanic or Latino origin and reported a race other than "White," either alone or in combination. To get a total for "Hispanic or Latino," add the two columns for "White alone Hispanic or Latino" and "All other Hispanic or Latino."

Occupation codes are 4-digit codes and are based on Standard Occupational Classification 2010.





## 2010 TOTAL AND NONWHITE POPULATION AND LABOR FORCE DATA IN KENTUCKY BY COUNTY

	CRITTENDEN	CUMBERLAND	DAVISS	EDMONSON	ELLIOTT	ESTILL	FAYETTE
<b>Total Population</b>	9,315	6,856	96,656	12,161	7,852	14,672	295,803
<b>16 Years and Over</b>	7,440	5,521	75,633	9,861	6,428	11,736	239,573
<b>Male</b>	3,694	2,677	36,169	4,924	3,638	5,731	116,854
<b>Female</b>	3,746	2,844	39,464	4,937	2,790	6,005	122,719
<b>Total Nonwhite Population</b>	210	316	8,522	372	346	215	71,804
<b>16 Years and Over</b>	108	194	5,552	200	291	112	49,895
<b>Male</b>	43	75	3,082	91	190	78	25,052
<b>Female</b>	65	119	2,470	109	101	34	24,843
<b>Civilian Labor Force Total</b>	4,044	3,108	48,630	5,186	3,290	6,412	152,490
<b>Male</b>	2,381	1,584	26,330	2,913	1,833	3,118	78,313
<b>Female</b>	1,663	1,524	22,300	2,273	1,457	2,518	74,177
<b>Employment Total</b>	3,638	2,735	44,231	4,490	2,892	5,645	140,359
<b>Male</b>	2,086	1,332	23,679	2,542	1,584	2,705	71,223
<b>Female</b>	1,552	1,403	20,552	1,948	1,308	2,164	69,136
<b>Unemployment Total</b>	406	373	4,399	696	398	767	12,131
<b>Male</b>	295	252	2,651	371	249	413	7,090
<b>Female</b>	111	121	1,748	325	149	354	5,041
<b>Unemployment Rate</b>	10.0%	12.0%	9.0%	13.4%	12.1%	12.0%	8.0%
<b>Male</b>	12.4%	15.9%	10.1%	12.7%	13.6%	13.2%	9.1%
<b>Female</b>	6.7%	7.9%	7.8%	14.3%	10.2%	14.1%	6.8%
<b>Civilian Labor Force, Nonwhite</b>	41	113	2,881	62	11	48	25,643
<b>Male</b>	20	63	1,671	39	11	39	13,134
<b>Female</b>	21	50	1,210	23	0	9	12,509
<b>Employment, Nonwhite</b>	37	91	2,191	39	9	48	22,052
<b>Male</b>	16	44	1,209	22	9	39	11,432
<b>Female</b>	21	47	982	17	0	9	10,620
<b>Unemployment, Nonwhite</b>	4	22	690	23	2	0	3,591
<b>Male</b>	4	19	462	17	2	0	1,702
<b>Female</b>	0	3	228	6	0	0	1,889
<b>Unemployment Rate, Nonwhite</b>	9.8%	19.5%	24.0%	37.1%	18.2%	0.0%	14.0%
<b>Male</b>	20.0%	30.2%	27.6%	43.6%	18.2%	0.0%	13.0%
<b>Female</b>	0.0%	6.0%	18.8%	26.1%	0.0%	0.0%	15.1%

All of the above estimates (excluding Total Population and Total Nonwhite Population) include only the civilian noninstitutional population and labor force of the age group 16 years and over.

# PRESENT STAFFING

As of January 1, 2014, J.M. Crawford & Associates has seven employees. Of this total, six are white males and one is a white female. The firm recruits new employees from previous employees, by recommendation by other employees and professionals in our field, and we also solicit resumes from qualified applicants by advertising job openings in local newspapers.

Employees consist of:

Engineers	(3) White Males
Technicians	(3) White Males
Administrative	(1) White Female

*Current Minority/Female Utilization is 14%.*

# EQUAL EMPLOYMENT OPPORTUNITY AGREEMENT

## The Law

- \* Title VII of the Civil Rights Act of 1964 (amended 1972) states that it is unlawful for an employer to discriminate in employment because of race, color, religion, sex, age (40-70 years) or national origin.
- \* Executive Order No. 11246 on Nondiscrimination under Federal contracts prohibits employment discrimination by contractor and sub-contractor doing business with the Federal Government or recipients of Federal funds. This order was later amended by Executive Order No. 11375 to prohibit discrimination on the basis of sex.
- \* Section 503 of the Rehabilitation Act of 1973 states:  
*The Contractor will not discriminate against any employee or applicant for employment because of physical or mental handicap.*
- \* Section 2012 of the Vietnam Era Veterans Readjustment Act of 1973 requires Affirmative Action on behalf of disabled veterans and veterans of the Vietnam Era by contractors having Federal contracts.
- \* Section 206(A) of Executive Order 12086, Consolidation of Contract Compliant Functions for Equal Employment Opportunity, states:  
*The Secretary of Labor may investigate the employment practices of any Government contractor or sub-contractor to determine whether or not the contractual provisions specified in Section 202 of this order have been violated.*

\*\*\*\*\*

J.M. Crawford & Associates, Inc. practices Equal Opportunity in recruiting, hiring, and promoting. It is JMC&A's intent to affirmatively provide employment opportunities for those individuals who have previously not been allowed to enter into the mainstream of society. Because of its importance to JMC&A, this policy carries the full endorsement of the President and Board of Directors of our company. In following this commitment to Equal Employment Opportunity and because JMC&A is the benefactor of Federal funds on some projects, it is both against JMC&A's policy and illegal for JMC&A to let contracts to companies which knowingly or unknowingly practice discrimination in their employment practices. Violation of the above mentioned ordinances may cause a contract to be cancelled and the contractor may be declared ineligible for future consideration.

Please sign this statement in the appropriate space acknowledging that you have read and understand the provisions contained herein. Return this document as part of your contract for work.

**SUBCONTRACTOR** - *complete this page and the Workforce Analysis Form*

**I/We agree to comply with the Civil Rights Laws listed above that govern employment rights of minorities, women, Vietnam veterans, handicapped and aged persons.**

\_\_\_\_\_  
*Signature*

\_\_\_\_\_  
*Name of Business*

\_\_\_\_\_  
*Date*

# WORKFORCE ANALYSIS FORM

Name of Organization _____							Date ____ / ____ / ____		
Categories	Total	White		Black		Other		Total	
		M	F	M	F	M	F	M	F
Administrators									
Professionals									
Superintendents									
Supervisors									
Foremen									
Technicians									
Protective Service									
Para-Professionals									
Office/Clerical									
Skilled Craft									
Service/Maintenance									
<b>TOTAL</b>									

Prepared by: \_\_\_\_\_

(Submit with the Equal Employment Opportunity Agreement)

## CONCLUSION

In conclusion, J.M. Crawford & Associates is committed to the principal and practice of Equal Employment Opportunity. The firm intends to comply with Federal, State, and local law prohibiting discrimination on the basis of race, color, religion, national origin, sex, and age (40-70). We are committed to furthering the advancement of minorities and females in every possible way.