

Checklist for AAP Contents

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On the following pages is a checklist of items that should be considered in the preparation of the plan or included in your affirmative action plan for minorities and women. Go through this list, item by item, to be sure that you will have an affirmative action plan that works for your bank and which is acceptable in the event of a compliance review.

1. **Cover Page**
Signed by preparer, Dated and Approved by Bank President
Dated approved
2. **Table of Contents**
3. **Year-end EEO-1 Report**
Complete, Signed, Dated
4. **Policy Statements on Affirmative Action.** Bank's EEO policy statement or reaffirmation, signed and dated on bank letterhead. Corporate EEO policy statement or reaffirmation, signed and dated on Company letterhead. Statement of individual responsibilities.
5. **Dissemination of policy.** Procedures for the internal dissemination of the policy
 - in the bank's newsletter.
 - in the employee policy and procedures manual.
 - in the new-employee handbook.
 - by use of posters.
 - in memos and letters from the President.
 - in meetings with supervisors and managers.
 - at orientation programs for newly hired or newly appointed managers.
 - through the performance appraisal or merit review process.

Procedures for the external dissemination of the policy

 - Recruiting sources contacted verbally and confirmed in writing with an acknowledgment from the agency.
 - Employment advertising with the specific "EEO employer" designation in the advertisement.
 - Minority publications and newspapers used for employment advertising.
 - Women and minorities pictured in company publications.
 - Reference in purchase orders to minority vendor program.
6. **Responsibility for implementation**
 - Statement of responsibility for coordinating program at corporate level.
 - Statement of responsibility for implementation at local level.
 - Statement of responsibility for implementation of policy by line managers.

7. Prior year's affirmative action plan results on AAP Form 1

- Last year's goals.
- Last year's results.
- Statistical and narrative analysis of last year's goal achievement.
- Explanation and rationale that adequately deals with any failure to meet last year's goals.
- Narrative account of positive steps made (e.g., good-faith efforts).

8. Utilization Analysis

Table of Organization listing jobs from entry level to executive.

Workforce Analysis

- Organizational units parallel actual Table of Organization or adequate explanation if otherwise.
- All active job titles in which there are incumbents as of the first day of the plan year listed from lowest to highest-paid, including first-line supervisors.
- Race and sex for each job title indicated.
- Wage and/or salary data or job class code shown for each job title.
- If lines of progression used, listed within each organizational unit.
- Is the grand total of minorities and women, the percentage of minorities, and the percentage of women shown for each job title?
- Is information totaled for each department or organizational workforce unit?
- Are totals and percentages calculated correctly?
- Is there a narrative analysis of concentration or under-representation of protected-class members in any segment of the Workforce Analysis?

Job Group Analysis

- Dated with AAP year
- Each job is reviewed for placement within a job group which has:
 - similar work content
 - similar rates of pay
 - similar promotional opportunities
 - similar utilization patterns.
- Do all jobs within each job group belong to the same EEO-1 job category?
- Do all jobs within a given job group belong to the same FLSA classification?
- Do job groups contain a sufficient number of employees (ideally 50) to permit calculation of a workable Utilization Analysis?
- Is there any job group with a job title with incumbents all of the same sex or race?

- Is there indication of concentration or under-representation of any protected-class member in any job group?
- Do the grand totals of number of employees in the Workforce Analysis and the Job Group Analysis agree?
- Is the Job Group Summary sheet included?
- Is the job group narrative analysis included?
- Within each job title have you indicated:
 - sex
 - race
 - wage or salary code

Availability Analysis

- Is an eight-factor analysis applicable to your operations or will a four-factor analysis be adequate for the review of external availability?
- Separate analyses for minorities and for women.
- Separate analyses for any minority subgroups that are two percent or more of the area workforce.
- Are the appropriate labor market statistics used for each job group?
- Raw statistics double-checked for accuracy.
- Geographic areas for raw external availability data reflect the actual source of applicants for each job group.
- Sources of raw availability data properly documented.
- For those job groups in which the recruiting area is the same as the local labor area, Factors 2 and 3 are the same.
- Internal applicant pool reviewed for minority/female availability in feeder jobs.
- Value weights are realistic for each job group.
- Value weights total 100%.
- For each job group, the final availability factor for minorities and women is no less than the raw statistics for Factor 2 (exception to this is where over-concentration in the job group presently exists).

Underutilization Analysis. Double-check that employment-level percentages and external availability percentages are correct. Form properly dated.
Underutilization properly declared where any exists (one-half person or more).

9. Facility Goals and Timetables

- Have conferences been held with department heads to:
 - review the AAP?
 - review the utilization analyses and particularly any underutilization in each department?
 - review relevant personnel projections and confirm correctness. Where underutilization exists, have 12-month number and percentage goals been established?

- Have you discussed goals and timetables and attempted to gain commitment?
 - Have you considered including a narrative for each department on how goals and timetables will be accomplished?
 - Do annual percentage goals meet or exceed current availability for each job group?
 - Does the facility head concur with these goals?
- 10. Identification of Problem Areas by Department or Branch**
Text covers analysis of performance in standard personnel areas.
- 11. Affirmative Action Program Development and Execution**
Text in the plan.
- 12. Compliance with Sex Discrimination Guidelines**
Text in the plan.
- 13. Compliance with Religion and National Origin Discrimination Guidelines**
Text in the plan.
- 14. Internal Monitoring and Reporting System**
- Text in the plan which adequately describes plan of action.
 - Text in the plan which adequately describes auditing actions for:
 - applicant flow?
 - hires?
 - promotions?
 - transfers?
 - demotions?
 - training?
 - terminations?
 - Have sample forms been developed to record each of these transactions?
- 15. Area and Community Action Programs**
- Description of support given to national programs.
 - Description of support given to local programs.
 - Support of minority enterprise.
 - Are appropriate exhibits and back-up material attached?
- 16. Affirmative Action Efforts in Consideration of Minorities and Women Not Currently in the Workforce**
Specific local action steps to further this activity.
- 17. Affirmative Action Program for Workers with Disabilities and for Disabled Veterans and Veterans for Disabled Veterans.** Separate text that covers many of the areas discussed in the Affirmative Action Plan for Women and Minorities, except there is no need to provide quantitative analysis.
- Description of this AAP
 - Persons covered by this AAP
 - Invitation to Self Identify
 - Policy Statement
 - Internal Dissemination of Policy
 - External Dissemination of Policy
 - Responsibility for Implementation

- Training of Personnel Involved in Selection
- Review of Personal Processes
- Review of Physical and Mental Qualifications
- Reasonable Accommodations
- Harassment
- Mandatory Job Listing
- Audit and Reporting System
- Exhibits
 - EEO Policy
 - Invitation to self-identify memo
 - Latest Vet-100 report
 - Letter to recruiting sources
 - Copies of Job Orders listed with your state