AFFIRMATIVE ACTION PROGRAM

Management Health Systems, Inc.
Corporate Office
5608 Princeton Avenue
P. O. Box 9386
Columbus, Georgia 31908

(Revised 10/2011)
EXECUTIVE ORDER 11246
AFFIRMATIVE ACTION PROGRAM

Organizational Profile
Workforce Analysis

Job Group Analysis

Utilization Analysis

   Placement of Incumbents in Job Groups
   Determining Availability
   Comparing Incumbency to Availability

Placement Goals

   Designation of Responsibility for Implementation
   Identification of Problem Areas
   Action-Oriented Programs

Internal Audit and Reporting System

Personnel Activity Data

(Revised 10/2011)
<table>
<thead>
<tr>
<th>Job Titles</th>
<th>Job Group Name</th>
<th>EEO-1 Category</th>
</tr>
</thead>
<tbody>
<tr>
<td>C.E.O.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>President</td>
<td></td>
<td></td>
</tr>
<tr>
<td>C.O.O./C.N.O</td>
<td>1.1</td>
<td>Executive/Senior Level Officials and Managers</td>
</tr>
<tr>
<td>C.F.O.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>V.P. Finance</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Accounting Manager</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Business Development Mgr-IT</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hospital Account Manager</td>
<td></td>
<td></td>
</tr>
<tr>
<td>International &amp; Domestic Sales Dir.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>National Sales Director</td>
<td>1.2</td>
<td>First/Mid Level Officials and Managers</td>
</tr>
<tr>
<td>Recruiter</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Immigration Specialist</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Contract Administrator</td>
<td></td>
<td></td>
</tr>
<tr>
<td>HR Director</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Manager of Corporate Technology</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Staff Accountant</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Registered Nurse</td>
<td>2</td>
<td>Professionals</td>
</tr>
<tr>
<td>Physical Therapist</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Occupational Therapist</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Speech Language Pathologist</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Pharmacist</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Respiratory Therapist</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Information Technologist (IT)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Licensed Practical Nurse</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Pharmacy Tech</td>
<td></td>
<td></td>
</tr>
<tr>
<td>X-Ray/ Imaging Tech</td>
<td>3</td>
<td>Technicians</td>
</tr>
<tr>
<td>Cath Lab Tech</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Med Tech</td>
<td></td>
<td></td>
</tr>
<tr>
<td>First Assist</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sterile Processing Tech</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Therapy Sales</td>
<td>4</td>
<td>Sales Workers</td>
</tr>
<tr>
<td>Nursing Sales</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Job Titles</td>
<td>Job Group Name</td>
<td>EEO-1 Category</td>
</tr>
<tr>
<td>------------------------------------------------</td>
<td>----------------</td>
<td>-------------------------</td>
</tr>
<tr>
<td>Licensure &amp; Endorsement Specialist</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Housing Coordinator</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Credentials Specialist</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Executive Administrative Asst./Safety Officer</td>
<td>5</td>
<td>Administrative Support Workers</td>
</tr>
<tr>
<td>Recruiting Assistant</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Domestic Therapy Sourcer</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Payroll/AR Coordinator</td>
<td></td>
<td></td>
</tr>
<tr>
<td>International Liaison</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Administrative Assistant</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Compliance/Risk Assistant</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Client Services Specialist</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Physical Therapy Assistant</td>
<td>9</td>
<td>Service Workers</td>
</tr>
<tr>
<td>Certified Occupational Therapy Asst</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Phlebotomist</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Scrub Tech</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Medical Assistant</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

(Revised 10/2011)
## Placement of Incumbents in Job Groups

<table>
<thead>
<tr>
<th>Job Group</th>
<th>Total # of Incumbents</th>
<th># of Females</th>
<th>Female Incumbency %</th>
<th># of Minorities</th>
<th>Minority Incumbency %</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.1</td>
<td>7</td>
<td>3</td>
<td>42%</td>
<td>0</td>
<td>0%</td>
</tr>
<tr>
<td>1.2</td>
<td>20</td>
<td>9</td>
<td>45%</td>
<td>3</td>
<td>15%</td>
</tr>
<tr>
<td>2</td>
<td>206</td>
<td>132</td>
<td>64%</td>
<td>168</td>
<td>81%</td>
</tr>
<tr>
<td>3</td>
<td>28</td>
<td>17</td>
<td>60%</td>
<td>6</td>
<td>21%</td>
</tr>
<tr>
<td>4</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>5</td>
<td>18</td>
<td>16</td>
<td>88%</td>
<td>4</td>
<td>22%</td>
</tr>
<tr>
<td>9</td>
<td>9</td>
<td>9</td>
<td>100%</td>
<td>6</td>
<td>66%</td>
</tr>
</tbody>
</table>

(Revised 10/2011)
## Comparing Incumbency to Availability

### And

### Annual Placement Goals

<table>
<thead>
<tr>
<th>Job Group</th>
<th>Female Incumbency %</th>
<th>Female Availability %</th>
<th>Establish Goal? Yes/No</th>
<th>If Yes, Goal for Females</th>
<th>Minority Incumbency %</th>
<th>Minority Availability %</th>
<th>Establish Goal? Yes/No</th>
<th>If Yes, Goal for Minorities</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>44%</td>
<td>38.6%</td>
<td>No</td>
<td></td>
<td>15%</td>
<td>17.3%</td>
<td>No</td>
<td>**</td>
</tr>
<tr>
<td>2</td>
<td>64%</td>
<td>53.7%</td>
<td>No</td>
<td></td>
<td>81%</td>
<td>20.6%</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>60%</td>
<td>57.8%</td>
<td>No</td>
<td></td>
<td>21%</td>
<td>24.6%</td>
<td>Yes</td>
<td>**</td>
</tr>
<tr>
<td>4</td>
<td>N/A*</td>
<td>50.5%</td>
<td>No</td>
<td>50.5%</td>
<td>N/A*</td>
<td>23.6%</td>
<td>Yes</td>
<td>23.6%</td>
</tr>
<tr>
<td>5</td>
<td>88%</td>
<td>75.6%</td>
<td>No</td>
<td></td>
<td>22%</td>
<td>27.1%</td>
<td>Yes</td>
<td>**</td>
</tr>
<tr>
<td>9</td>
<td>100%</td>
<td>59.4%</td>
<td>No</td>
<td></td>
<td>66%</td>
<td>37.0%</td>
<td>No</td>
<td></td>
</tr>
</tbody>
</table>

*None of the sales positions were filled at the time period covered by this report.

** The ratio of incumbency to availability is less than 80%.

(Revised 10/2011)
Designation of Responsibility for Implementation

Responsibilities of the Equal Employment Opportunity Manager:

The Human Resource Director has the responsibility for designing and ensuring the effective implementation of MHSI’s Affirmative Action Program (AAP). These responsibilities include, but are not limited to, the following:

1. Developing Equal Employment Opportunity (EEO) policy statements, affirmative action programs and internal and external communication procedures;

2. Assisting in the identification of AAP/EEO problem areas;

3. Assisting management in arriving at effective solutions to AAP/EEO problems;

4. Designing and implementing an internal audit and reporting system that;
   a. Measures the effectiveness of MHSI’s program;
   b. Determines the degree to which AAP goals and objectives are met; and
   c. Identifies the need for remedial action;

5. Keeping MHSI’s Management Team informed of equal opportunity progress and reporting potential problem areas within the company in an annual report;

6. Reviewing the company’s AAP for qualified minorities and women with all managers and supervisors at all levels to ensure that the policy is understood and is followed in all personnel activities;

7. Auditing the contents of the company’s bulletin board to ensure compliance information is posted and up-to-date; and

8. Serving as liaison between MHSI and enforcement agencies.

(Revised 10/2011)
Responsibilities of Managers and Supervisors:

It is the responsibility of all managerial and supervisory staff to implement MHSI’s AAP. These responsibilities include, but are not limited to:

1. Assisting in the identification of problem areas, formulating solutions, and establishing departmental goals and objectives when necessary;

2. Reviewing the qualifications of all applicants and employees to ensure qualified individuals are treated in a nondiscriminatory manner when hiring, promotion, transfer, and termination actions occur; and

3. Reviewing the job performance of each employee to assess whether personnel actions are justified based on the employee’s performance of his or her duties and responsibilities.

(Revised 10/2011)
### Identification of Problem Areas

<table>
<thead>
<tr>
<th>Areas of Concern</th>
<th>Corrective Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>Category 4, Sales Workers</td>
<td>We will actively recruit minorities for this position as it becomes available. Attention will be given to any additional training that might be needed to help minorities succeed in this category.</td>
</tr>
</tbody>
</table>

(Revised 10/2011)
Action-Oriented Programs

MHSI has instituted action programs to eliminate identified problem areas and to help achieve specific affirmative action goals. These programs include:

1. Conducting annual analyses of job descriptions to ensure they accurately reflect job functions;

2. Reviewing job descriptions by department and job title using job performance criteria;

3. Making job descriptions available to recruiting sources and available to all members of management involved in the recruiting, screening, selection and promotion processes;

4. Evaluating the total selection process to ensure freedom from bias through:
   a. Reviewing job applications and other pre-employment forms to ensure information requested is job-related;
   b. Evaluating selection methods that may have a disparate impact to ensure that they are job-related and consistent with business necessity;
   c. Training personnel and management staff on proper interview techniques; and
   d. Training in EEO for management and supervisory staff;

5. Using techniques to improve recruitment and increase the flow of minority and female applicants. MHSI presently undertakes the following actions:
   a. Include the phrase “Equal Opportunity/Affirmative Action Employer” in all printed employment advertisements;
   b. Place help wanted advertisement, when appropriate, in local minority news media and women’s interest media;
   c. Disseminate information on job opportunities to organizations representing minorities, women and employment development agencies when job opportunities occur;
   d. Encourage all employees to refer qualified applicants;

(Revised 10/2011)
6. Ensuring that all employees are given equal opportunity for promotion. This is achieved by:

   a. Posting promotional opportunities;

   b. Offering counseling to assist employees in identifying promotional opportunities, training and educational programs to enhance promotions and opportunities for job rotation or transfer; and

   c. Evaluating job requirements for promotion.
Internal Audit and Reporting System

The Human Resource Director has the responsibility for developing and preparing the formal documents of the AAP. The Human Resource Director is responsible for the effective implementation of the AAP; however, responsibility is likewise vested with each member of the management team, managers and supervisors. MHSI’s audit and reporting system is designed to:

- Measure the effectiveness of the AAP/EEO program;
- Document personnel activities;
- Identify problem areas where remedial action is needed; and
- Determine the degree to which MHSI’s AAP goals and objectives have been obtained.

The following personnel activities are reviewed to ensure nondiscrimination and equal employment opportunity for all individuals without regard to their race, color, gender, religion, and national origin:

- Recruitment, advertising, and job application procedures;
- Hiring, promotion, upgrading, layoff, recall from layoff;
- Rates of pay and any other forms of compensation including fringe benefits;
- Job assignments, job classifications, job descriptions, and seniority lists;
- Sick leave, leaves of absence, or any other leave;
- Training, attendance at professional meetings and conferences; and
- Any other term condition, or privilege of employment.

The following documents are maintained as a component of MHSI’s internal audit process:

1. An applicant flow log showing the name, race, sex, date of application, job title, interview status and the action taken for all individuals applying for job opportunities;

2. Summary data of external job offers and hires, promotions, resignations, terminations, and layoffs by job group and by sex and minority group identification’

3. Summary data of applicant flow by identifying, at least, total applicants, total minority applicants, and total female applicants for each position;

4. Maintenance of employment applications (not to exceed one year); and

5. Records pertaining to MHSI’s compensation system.

(Revised 10/2011)
MHSI’s audit system includes an annual report documenting MHSI’s efforts to achieve its EEO/AAP responsibilities. Managers and supervisors are asked to report any current or foreseeable EEO problem areas and are asked to outline their solutions. If problem areas arise, the manager or supervisor is to report the problem area immediately to the Human Resource Director. In the annual report, the following occurs:

1. The Human Resource Director will discuss any problems relating to significant rejection ratios, EEO charges, etc., with the management team; and

2. The Human Resource Director will report the status of MHSI’s AAP goals and objectives to the management team. The Human Resource Director will recommend remedial actions for the effective implementation of the AAP.

(Revised 10/2011)
Support Data

ANALYSIS OF AFFIRMATIVE ACTION PROGRAM PROGRESS: PRIOR YEAR

<table>
<thead>
<tr>
<th>JOB GROUP*</th>
<th>2010 GOAL PLACEMENT RATE (%)**</th>
<th>2011 ACTUAL PLACEMENT RATE (%)***</th>
<th>ANALYSIS OF GOOD FAITH EFFORTS</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Females</td>
<td>Minorities 17.3%</td>
<td>15%</td>
<td>This is a 10.6% increase over last year. Although we are over 80% of availability minority recruitment efforts will continue for this group.</td>
</tr>
<tr>
<td>2 Females</td>
<td>Minorities</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3 Females</td>
<td>Minorities</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4 Females</td>
<td>Minorities 23.6%</td>
<td></td>
<td>This group has not been staffed this year. Although we had the goal of 23.6%, no employee has been hired in this group. If we do staff this group, we will continue to list jobs with the local D.O.L and work to recruit minorities.</td>
</tr>
<tr>
<td>5 Females</td>
<td>Minorities</td>
<td></td>
<td></td>
</tr>
<tr>
<td>9 Females</td>
<td>Minorities 37.0%</td>
<td>66%</td>
<td>This is a 34.25% jump from last year, and exceeds availability.</td>
</tr>
</tbody>
</table>

*JOB GROUPS WHERE GOALS ARE REQUIRED

**GOAL PLACEMENT RATE EQUALS AVAILABILITY PERCENTAGE RATE FOR MINORITIES OR FEMALES AS APPLICABLE

***ACTUAL PLACEMENT RATE FOR MINORITIES OR FEMALES FOR A PARTICULAR JOB GROUP IS EQUAL TO THE NUMBER OF MINORITY OR FEMALE PLACEMENTS DIVIDED BY THE TOTAL NUMBER OF PLACEMENTS. FOR EXAMPLE, IF JOB GROUP 1 EXPERIENCED 45 FEMALE PLACEMENTS OUT OF 90 TOTAL PLACEMENTS, THE ACTUAL PLACEMENT RATE FOR FEMALES IS (45/90-50) OR 50%.

(Revised 10/2011)
SECTION 503 & VEVRAA
AFFIRMATIVE ACTION PROGRAM

Equal Opportunity Policy for Qualified Individuals with Disabilities and Qualified Protected Veterans

Review of Personnel Processes

Review of Physical and Mental Job Qualification

Reasonable Accommodation to Physical and Mental Limitations

Harassment Prevention Procedures

External Dissemination of Policy, Outreach and Positive Recruitments

Internal Dissemination of Policy

Audit and Reporting Systems

Responsibility for Implementation of AAP

Training to Ensure AAP Implementation

Invitation to Self-Identify

(Revised 10/2011)
Policy Statement - Equal Employment Opportunity for
Qualified Individual with Disabilities
And Qualified Protected Veterans

It is the policy of Management Health Systems, Inc. d/b/a MedPro Staffing (MHSI) not to discriminate against any employee or applicant for employment because he or she is a qualified individual with a disability, a disabled veteran, a newly separated veteran, a campaign veteran, or an armed forces service medal veteran (i.e., qualified protected veterans). It is also the policy of MHSI to take affirmative action to employee and to advance in employment, all persons regardless of their status as qualified individuals with disabilities or qualified protected veterans, and to base all employment decisions only on valid job requirements. This policy shall apply to all employment actions, including but not limited to recruitment, hiring, upgrading, promotion, transfer, demotion, layoff, recall, termination, rates of pay or other forms of compensation and selection for training at all levels of employment.

Employees of and applicants to MHSI will not be subject to harassment on the basis of disability or status as a protected veteran. Additionally, retaliation, including intimidation, threats, or coercion, because an employee or applicant has 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 or protected veterans is prohibited.

As CEO of MHSI, I am committed to the principles of Affirmative Action and Equal Employment Opportunity. In order to ensure dissemination and implementation of equal employment opportunity and affirmative action throughout all levels of the company, I have selected the Human Resource Director as the Equal Employment Opportunity (EEO) Manager for MHSI. One of the Human Resource Director’s duties will be to establish and maintain an internal audit and reporting system to allow for effective measurement of MHSI’s programs.

In furtherance of MHSI’s policy regarding Affirmative Action and Equal Employment Opportunity, MHSI has developed a written Affirmative Action Program which sets forth the policies, practices and procedures that MHSI is committed to in order to ensure that its policy of non-discrimination and affirmative action for qualified individuals with disabilities and qualified protected veterans is accomplished. This Affirmative Action Program is available for inspection by any employee or applicant for employment upon request, during normal business hours, in the Corporate Office, or on the MHSI website. Interested persons should contact the Human Resource Director at 706-322-7085 or 800-448-6928 for assistance.

Michael LeMonier, CEO
November 7, 2011
Management Health Systems, Inc.
d/b/a MedPro Staffing & Direct Placement
Review of Personnel Processes

MHSI reviews annually its personnel processes to determine whether its present procedures assure careful, thorough and systematic consideration of the qualifications of known qualified individuals with disabilities and qualified protected veterans. This review covers all procedures related to the filling of job vacancies either by hire or by promotion, as well as all training opportunities offered or made available to employees.

In determining the qualifications of veterans, MHSI limits its consideration of a qualified protected veteran’s military record, including discharge papers, to only that portion of the record which is relevant to the specific job qualifications for which the veteran is being considered.

Based upon MHSI’s review of its personnel processes, MHSI will modify the personnel processes when necessary, and will include the development of new procedures in this Affirmative Action Program to ensure equal employment opportunity. Although no modifications have been made this last year, we continue to research for effective ways for our advertisement to reach veterans.

(Revised 10/2011)
Review of Physical and Mental Job Qualification Standards

The physical and mental job qualifications of all jobs were reviewed during calendar year 2011 to ensure that, to the extent that such qualification requirements tend to screen out qualified individuals with disabilities and qualified disabled veterans, job qualifications are consistent with business necessity and the safe performance of the job.

No qualification requirements were identified that are likely to have a screening effect. All job qualification requirements were found to be job-related and consistent with business necessity and safety.

MHSI will continue to review physical and mental job qualification requirements whenever a new client or position is added. MHSI will conduct a qualifications review whenever job duties change.

Certain healthcare positions require a physical and/or a Post-Offer Medical Questionnaire. Any information obtained as a result of an employee’s pre-placement physical or Post-Offer Medical Questionnaire will be kept confidential, except as otherwise provided for in Section 503 regulations. The results of the examinations or inquiry will be used in accordance with the Section 503 Regulations.

(Revised 10/2011)
Reasonable Accommodation to Physical and Mental Limitations

MHSI commits to making a reasonable accommodation to the known physical and mental limitations of qualified individuals with disabilities and qualified disabled veterans, unless such accommodation would impose an undue hardship on the conduct of its business, or endanger the health or safety of a patient. MHSI 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 would cause significant difficulty or expense, as provided for in the Section 503 regulations..

(Revised 10/2011)
Harassment Prevention and Prohibition Against Retaliation

Employees and applicants of MHSI will not be subject to harassment because of disability or their status as a protected veteran. If an employee or applicant believes that he/she has been subject to harassment, he/she may file a complaint with the Human Resource Director as provided for in our Grievance Policy. Furthermore, employees of, and applicants to, MHSI will not be subject to harassment, intimidation, threats, coercion, or discrimination because they have engaged or may engage in filing a complaint, assisting in a review, investigation, or hearing, or have otherwise sought to obtain their legal rights related to any federal, state, or local law regarding EEO for qualified individuals with disabilities or qualified protected veterans.

Retaliation, including intimidation, threat, or coercion, 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 or protected veterans is prohibited.

Any employees or applicants who feel that they have been subject to retaliation because harassment, intimidation, threats, coercion, or discrimination because of their disability or status as a qualified protected veteran should contact the HR Director at 706-322-7085, or 800-448-6928 for assistance. This policy is communicated to all employees and supervisors annually; most recently on September 12, 2011. A copy is posted in the Employee Breakroom.

(Revised 10/2011)
External Dissemination of Policy, Outreach and Positive Recruitment

All subcontractors, vendors and suppliers have been sent written notification of MHSI’s Equal Employment Opportunity and Affirmative Action policy regarding the employment of qualified individuals with disabilities and qualified protected veterans.

All recruiting sources have been informed of the company’s policy concerning the employment of qualified individuals with disabilities and qualified protected veterans and have been advised to actively recruit and refer qualified persons for job opportunities.

MHSI lists all employment openings on our website, on various job boards, minority job boards, and advertises regularly in Military Medical News. Client facilities have job openings that various staffing agencies are invited to fill, and these client facilities may advertise these same positions on various job boards and/or with the Department of Labor. The jobs MedPro fills do not belong to MedPro. These jobs come open, and are filled, every hour of the day by whoever gets there first with a qualified candidate that is accepted by the healthcare facility. Internal Staff positions are listed with the local Department of Labor.

It is virtually impossible for MedPro to advertise every job opening with the local/state Department of Labor. Arrangements have been made to ensure that each recruitment source is provided with timely notice of job opportunities to ensure that recruitment sources have an opportunity to refer qualified candidates.

The equal employment opportunity clause concerning the employment of qualified individuals with disabilities and qualified protected veterans is included in all contracts.

(Revised 10/2011)
Internal Dissemination of Policy

Copies of our affirmative action programs will be made available for inspection to any employee or applicant upon request to promote understanding, acceptance and support. Policies are re-emphasized to managers and supervisors annually.

MHSI’s Affirmative Action policy and the EEO poster are posted throughout our offices and on our website.

All applicants who believe they are a qualified individual with a disability, as defined in Section 503 of the Rehabilitation Act of 1973, as amended, or who are a qualified protected veteran under the equal employment opportunity provisions of the Vietnam Era Veterans’ Readjustment Assistance Act of 1974, as amended, have been invited to identify themselves if they wish to benefit under this affirmative action program. This is a part of the packet each person who receives a job offer receives, and includes the form to self-identify. Employees may self-identify at anytime.

All employees are advised annually of the company’s policy and encouraged to aid in MHSI’s affirmative action efforts to ensure a fair and effective program.

Briefing sessions are conducted annually for managers and supervisors to review the applicable regulations and to discuss such affirmative action measures as training and reasonable accommodation. This year’s briefing was done by the Chief Operating Officer on 9/12/11.

When making internal Equal Opportunity audits, implementation of this affirmative action program will be reviewed.

MHSI’s Human Resource Director has attended State-sponsored workshops, which stressed the use of vocational rehabilitation agencies in hiring qualified individuals with disabilities and qualified special disabled veterans and reasonable accommodation.

At least once a year the policy is distributed to all employees.

(Revised 10/2011)
Audit and Reporting Systems

The EEO/AA Manager has the responsibility for developing and preparing the formal documents of the AAP. The EEO/AA is responsible for the effective implementation of the AAP; however, responsibility is likewise vested with each Director and Manager. MHSI’s audit and reporting system is designed to:

- Measure the effectiveness of the AAP/EEO program;
- Document personnel activities;
- Identify problem areas where remedial action is needed; and
- Determine the degree to which MHSI’s AAP goals and objectives have been obtained.

The following activities are reviewed at least annually to ensure freedom from stereotyping qualified individuals with disabilities and qualified protected veterans in any manner, including that which may limit their access to any job for which they are qualified.

- Recruitment, advertising, and job application procedures;
- Hiring, promotion, upgrading, layoff, recall from layoff;
- Rates of pay and any other forms of compensation including fringe benefits;
- Job assignments, job classifications, job descriptions, and seniority lists;
- Sick leave, leaves of absence, or any other leave;
- Training, attendance at professional meetings and conferences; and
- Any other term, condition, or privilege of employment.

At all training programs MHSI’s managers and supervisors are asked to report any current or foreseeable EEO problem areas and are asked to outline their suggestions/recommendations for solutions. If problem areas arise, the manager or supervisor is to report problem areas immediately to the EEO/AA Manager. Annually the following occurs:

1. The EEO/AA Manager will discuss any problems relating to significant rejection ratios, EEO charges, etc., with the CEO, President, VP Finance, CFO and COO (hereinafter call Management Team); and

2. The EEO/AA Manager will report the status of the MHSI’s goals and objectives to the Management Team. The EEO/AA Manager will recommend remedial actions for the effective implementation of the AAP.

(Revised 10/2011)
Responsibility for Implementation of AAP

**Responsibilities of the Equal Opportunity Manager**

In furtherance of MHSI’s commitment to Affirmative Action and Equal Employment Opportunity for qualified individuals with disabilities and qualified protected veterans, the EEO/AA Manager has the responsibility for designing and ensuring effective implementation of MHSI’s AAP. These responsibilities include, but are not limited to:

1. The development of the AAP for individuals with disabilities and protected veterans, policy statements, personnel policies and procedures, internal and external communication of the policy, and monitoring the effectiveness of these actions;

2. Reviewing all personnel actions, policies, and procedures to ensure compliance with MHSI’s affirmative action obligations;

3. Reviewing the qualifications of applicants and employees to ensure qualified individuals are treated in a nondiscriminatory manner when hiring, promoting and when termination actions occur;

4. Assisting in the identification of problem areas and the development of solutions to those problems;

5. Monitoring the effectiveness of the program on a continuing basis through the development and implementation of an internal audit-and reporting system that measures the effectiveness of the program;

6. Keeping the Management Team informed of equal opportunity progress and problems within the company through reports.

7. Providing MHSI’s managers with a copy of the Affirmative Action Program for Qualified Individuals with Disabilities and Qualified Protected Veterans and reviewing the program with them on an annual basis to ensure knowledge of their responsibilities for implementation of the program;

8. Reviewing the company’s AAP for qualified individuals with disabilities and qualified protected veterans with all managers and supervisors at all levels to ensure that the policy is understood and is followed in all personnel activities;

9. Auditing the contents of company bulletin boards annually to ensure that compliance information is posted and is up-to-date;

10. Serving as liaison between MHSI and enforcement agencies; and

11. Serving as liaison between MHSI and organizations for qualified individuals with disabilities and qualified protected veterans.

(Revised 10/2011)
Responsibilities of Directors and Managers

Managers and supervisors are advised annually of their responsibilities under the company’s AAP for qualified individuals with disabilities and qualified veterans, and of their obligations to:

1. Review the company’s Affirmative Action policy for qualified individuals with disabilities and qualified protected veterans with subordinate managers and supervisors to ensure that they are aware of the policy and understand their obligation to comply with it in all personnel actions.

2. Assist in the identification of problem areas, formulate solutions, and establish departmental goals and objectives when necessary;

3. Review the qualifications of applicants and employees to ensure qualified individuals are treated in a nondiscriminatory manner when hire, promotion and termination actions occur; and

4. Review all employees’ performance to ensure that non-discrimination is adhered to in all personnel activities.

(Revised 10/2011)
Training to Ensure AAP Implementation

Training is provided to all personnel involved in the recruitment, screening, hiring, promotion, disciplinary and related employment processes, to ensure that the commitments made in MHSI’s AAP are implemented. Training sessions are conducted at the time of hire and at least annually with all staff employees. Training was most recently conducted on September 12, 2011.

(Revised 10/2011)
Invitation to Self-Identify for
Qualified Protected Veterans

1. MHSI is a federal contractor subject to the Vietnam Era Veterans’ Readjustment Assistance Act of 1974, as amended, (VEVRAA) which requires federal contractors to take affirmative action to employ and advance in employment qualified disabled veterans and qualified protected veterans. VEVRAA prohibits discrimination and requires affirmative action in all personnel practices regarding protected veterans. This statute covers disabled veterans, Armed Forces service medal veterans, recently separated veterans, and other veterans who served during a war, or in a campaign or expedition for which a campaign badge has been authorized. Following an offer of employment new employees will be given an opportunity to self-identify any veteran’s status applicable.

2. **An invitation to special disabled veterans:** Qualified special disabled veterans are included in our affirmative action program. They are encouraged to provide information to assist us in placing them in an appropriate position and in making accommodations for their disability. The term “qualified special disabled veteran” refers to any veteran who is entitled to compensation (or who, but for the receipt of military retired pay, would be entitled to compensation) under laws administered by the Department of Veterans Affairs, or who was discharged or released from active duty because of a service-connected disability.

**An invitation to veterans of the Vietnam era:** Veterans of the Vietnam era are included under our affirmative action program. The term “veteran of the Vietnam era” refers to a person who served on active duty for a period of more than 180 days, and was discharged or released therefrom with other than a dishonorable discharge, if any part of such active duty occurred in the Republic of Vietnam between February 28, 1961, and May 7, 1975 or between August 5, 1964, and May 7, 1975, in all other cases. The term also refers to a person who was discharged or released from active duty for a service-connected disability if any part of such active duty was performed in the Republic of Vietnam between February 28, 1961, and May 7, 1975, or between August 5, 1964, and May 7, 1975, in all other cases.

**An invitation to other protected veterans:** This category includes any person who served on active duty during a war or in a campaign or expedition for which a campaign badge has been authorized, under laws administered by the Department of Defense.

**An invitation to recently separated veterans:** Recently separated veterans are encouraged to apply. This category includes any veteran during the three year period beginning on the date of such veteran’s discharge or release from active duty. They are required to include their discharge date.

3. Veterans may inform us of their desire to benefit under the program at this time and/or at any time in the future.

(Revised 10/2011)
4. Submission of this information is voluntary and refusal to provide it will not subject applicants to any adverse treatment. The information provided will be used only in ways that are not inconsistent with the Vietnam Era Veterans’ Readjustment Assistant Act of 1974, as amended.

5. All information submitted will be kept confidential, except that (i) supervisors and managers may be informed regarding restrictions on the work or duties of qualified disabled veterans, and regarding necessary accommodations; (ii) first aid and safety personnel may be informed, when and to the extent appropriate, if the veteran has a condition that might require emergency treatment; and (iii) government officials engaged in enforcing laws administered by OFCCP, or enforcing the Americans with Disabilities Act, may be informed.

6. Qualified special disabled veteran are asked to assist us by telling us about (i) any special methods, skills, and procedures which qualify them for positions that they might otherwise be able to do because of your disability so that they will be considered for any positions of that kind, and (ii) the accommodations which we could make which would enable them to perform the job properly and safely, including special equipment, changes in the physical layout of the job, elimination of certain duties relating to the job, provision of personal assistance services or other accommodations. This information will assist us in placing them in an appropriate position and in making accommodations for their disability.

7. A written copy of this Affirmative Action Program is available for inspection by any employee or applicant for employment, during normal business hours, in all offices of MHSI. Interested personal should contact the EEO/AA Manager at (800) 448-6928 for assistance.

(Revised 8/2011)
Invitation to Self-Identify for Individual With Disabilities

1. MHSI is a Government contractor subject to Section 503 of the Rehabilitation Act of 1973, as amended, which requires Government contractors to take affirmative action to employ and advance in employment qualified individuals with disabilities.

2. Following a job offer, candidates are provided with the Voluntary Self-Identification Statement – Post Job Offer form in order to let MHSI know if they would like to be considered under the affirmative action program.

3. Candidates/employees are told that they may inform MHSI of their desire to benefit under the program at the time of hire, or at any time in the future. The information they provide assists us in placing them in appropriate positions and making any necessary accommodation for the disability.

4. Candidates/employees are informed that the information they provide is voluntary and they are allowed to decline to self-identify.

5. The information provided is strictly confidential. No employment decision will be based on this information. The form is kept separate and never becomes a part of the personnel record. Information is only shared in the following situations: (1) Supervisors and managers may be informed regarding restriction on the work or duties of qualified individuals with disabilities, and regarding necessary accommodations. (2) First aid and safety personnel may be informed, when and to the extent appropriate, if the condition might be require emergency treatment. (3) Government officials engaged in enforcing laws administered by OFCCP or the Americans with Disabilities Act, as amended, may be informed.

6. A written copy of this Affirmative Action Program is available for inspection by any employee or applicant for employment, during normal business hours, in the Corporate Office, or on the MHSI website. Employees and applicants may also contact the Human Resource Director at 706-322-7085, or 800-448-6928 for assistance.

(Revised 10/2011)