

# GRA, Inc.

## Affirmative Action Plan

### Section 503 of the Rehabilitation Act And the Vietnam Era Veterans Readjustment Assistance Act

2008

**Policy Statement – Equal Employment Opportunity for  
Qualified Individuals with Disabilities  
and Qualified Protected Veterans**

GRA, Inc., will not 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 GRA to take affirmative action to employ, 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, including apprenticeship, at all levels of employment.

Employees of and applicants to GRA 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 equal opportunity for qualified individuals with disabilities or qualified protected veterans.

As Chief Executive Officer, 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 Vice President for Administration as the Equal Employment Opportunity (EEO) Manager for GRA. One of the EEO Manager's duties will be to establish and maintain an internal audit and reporting system to allow for effective measurement of GRA's employment and affirmative action programs.

To effectively promulgate the GRA's policy regarding Affirmative Action and Equal Employment Opportunity, we have developed a written Affirmative Action Plan which sets forth the policies, practices and procedures which GRA will apply 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 Plan is available for inspection by any employee or applicant for employment upon request on our website at [www.GRAinc.com](http://www.GRAinc.com). Interested individuals may also contact Pete Dickson, Vice President for Administration, at 214.341.2756, [PeteD@GRAinc.com](mailto:PeteD@GRAinc.com)

**Stephen J. Kenealy**  
**Vice President and CEO**  
**May 1, 2008**

### **Review of Personnel Processes**

GRA will annually review its personnel processes to determine whether these processes 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, as well as all training opportunities offered or made available to employees.

In determining the qualifications of veterans, GRA will limit 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 GRA's review of its personnel processes, GRA will modify the processes and will develop new procedures when necessary to ensure equal employment opportunity. Our 2008 review identified a number of necessary modifications, including notification to State Employment Services, workforce notification, and publication of policy statements.

### **Review of Physical and Mental Job Qualification Standards**

The physical and mental job qualifications of all jobs will be reviewed during calendar year 2008 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.

GRA will review physical and mental job qualification requirements whenever a job is vacated prior to re-filling that job and will conduct a qualifications review whenever job duties change.

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

If GRA should inquire into an employee's physical or mental condition or should conduct a medical examination prior to a change in employment status, GRA affirms that information obtained as a result of the inquiry will be kept confidential, except as otherwise provided for in the Section 503 regulations. The results of the examination or inquiry will be used in accordance with the Section 503 Regulations.

**Reasonable Accommodation To Physical and Mental Limitations**

GRA 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. In determining the extent of its obligation, GRA will consider business necessity and financial costs and expenses, among other factors.

### **Harassment Prevention Procedures**

Employees of and applicants to GRA 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. Any employees or applicants who feel that they have been subject to harassment, intimidation, threats, coercion, or discrimination because of their disability or status as a qualified protected veteran should contact the EEO Manager at 214.341.2756. This policy is communicated to all employees and supervisors annually and is included in the GRA Employee Handbook.

**External Dissemination of Policy, Outreach and  
Positive Recruitment**

All subcontractors, vendors and suppliers will be sent written notification of GRA's Equal Employment Opportunity and Affirmative Action policy regarding the employment of qualified individuals with disabilities and qualified protected veterans.

All recruiting sources, including State employment agencies, will be 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.

GRA will list all suitable employment openings with the appropriate offices of the State Employment Service. A copy of GRA's Affirmative Action Policy for qualified individuals with disabilities and qualified protected veterans will be provided to the State Employment Service annually.

The equal employment opportunity clause concerning the employment of qualified individuals with disabilities and qualified protected veterans will be included in all nonexempt subcontracts and purchase orders.

**Internal Dissemination of Policy**

Copies of this Affirmative Action Plan will be available on the GRA website for inspection by any employee. We will provide this Plan to any applicant upon request. Policies are re-emphasized to managers, supervisors, and employees annually.

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, will be invited to identify themselves if they wish to benefit under this affirmative action program. Employees may self-identity at anytime.

All employees will be advised annually of this affirmative action policy and encouraged to aid in GRA's affirmative action efforts.

All managers and supervisors will be advised annually of the applicable regulations and such affirmative action measures as training and reasonable accommodation.

Articles regarding accomplishments of employees who are qualified individuals with disabilities and qualified protected veterans shall be included in company publications.

## **Audit and Reporting Systems**

The EEO Manager is responsible for developing the written AAP. While the EEO Manager promotes the effective implementation of the AAP, the basic responsibility for effective affirmative action is vested with each GRA officer, manager, and supervisor.

To help fulfill its affirmative action responsibilities, GRA has established an audit and reporting system 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 AAP goals and objectives have been obtained.

The following activities will be 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.

GRA's audit system will include an annual report documenting the company's efforts to fulfill its EEO/AAP responsibilities. Managers and supervisors will be asked to report any current or foreseeable EEO problem areas and to outline their suggestions for solutions. If problem areas arise, the manager or supervisor is to report problem areas immediately to the EEO Manager. During annual reporting, the following will occur:

1. The EEO Manager will discuss any problems relating to significant rejection ratios, EEO charges, etc., with the CEO.
2. The EEO Manager will report the status of the GRA's AAP goals and objectives to the CEO. The EEO Manager will recommend remedial actions for the effective implementation of the AAP.

## Responsibility for Implementation of AAP

### Responsibilities of the Equal Employment Opportunity Manager

As EEO Manager, the Vice President for Administration has the responsibility for designing and ensuring effective implementation of this 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 GRA's affirmative action obligations;
3. 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;
4. Assisting in the identification of problem areas and the development of solutions to those problems;
5. Developing and implementing an internal audit and reporting system that measures the effectiveness of the AAP;
6. Keeping the CEO informed of equal opportunity progress and problems within the company;
7. Providing officers and 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. Insuring that the employee website, Employee Handbook, and newsletters contain up-to-date program information;
10. Serving as liaison between GRA and enforcement agencies; and
11. Serving as liaison between GRA and organizations for qualified individuals with disabilities and qualified protected veterans.

**Responsibilities of Managers and Supervisors**

Managers and supervisors will be advised annually of their responsibilities under the company's AAP for qualified individuals with disabilities and qualified protected 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 organizational goals and objectives when necessary;
3. Review the qualifications of all applicants and employees to ensure qualified individuals are treated in a nondiscriminatory manner when hire, promotion, transfer, and termination actions occur; and
4. Observe and take action as necessary to ensure that all employees adhere to the principles of non-discrimination in work activities.

### **Training to Ensure AAP Implementation**

Training will be provided to all personnel involved in the recruitment, screening, hiring, promotion, disciplinary and related employment processes, to ensure that the commitments made in GRA's AAP are implemented.

### Invitation to Self-Identify for Qualified Protected Veterans

1. GRA is a federal contractor subject to the Vietnam Era Veterans Readjustment Assistance Act of 1974, as amended, which requires federal contractors to take affirmative action to employ and advance in employment qualified disabled veterans and qualified protected veterans.
2. *An invitation to veterans of the Vietnam era only:* If you are a veteran of the Vietnam era, we would like to include you under our affirmative action program. If you would like to be included under the affirmative action program, please tell us. 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 qualified disabled veterans only:* If you are a qualified special disabled veteran, we would like to include you in our affirmative action program. If you would like to be included under the affirmative action program, please tell us. This information will assist us in placing you in an appropriate position and in making accommodations for your disability. The term "qualified special disabled veteran" refers to a 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 for a disability rated at 30 percent or more, or rated at 10 or 20 percent in the case of a veteran who has been determined by the Department of Veterans Affairs to have a serious employment handicap. The term also refers to a person who was discharged or released from active duty because of a service-connected disability.

*An invitation to both (1) veterans of the Vietnam era and (2) qualified disabled veterans:* If you are a veteran of the Vietnam era or a qualified special disabled veteran, we would like to include you under our affirmative action program. If you would like to be included under the affirmative action program, please tell us. 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. The term 'qualified special disabled veteran' refers to a

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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, for a disability rated at 30 percent or more, or rated at 10 or 20 percent in the case of a veteran who has been determined by the Department of Veterans Affairs to have a serious employment handicap. The term also refers to a person who was discharged or released from active duty because of a service-connected disability.

3. You may inform us of your desire to benefit under the program at this time and/or at any time in the future.
4. Submission of this information is voluntary and refusal to provide it will not subject you to any adverse treatment. The information provided will be used only in ways that are not inconsistent with the Vietnam Era Veterans Readjustment Assistance Act of 1974, as amended.
5. The information you submit 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 you have 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. If you are a qualified special disabled veteran it would assist us if you tell us about (i) any special methods, skills, and procedures which qualify you for positions that you might not otherwise be able to do because of your disability so that you will be considered for any positions of that kind, and (ii) **FOR CURRENT EMPLOYEES ONLY:** the accommodations which we could make which would enable you 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 you in an appropriate position and in making accommodations for your disability.
7. A written copy of this Affirmative Action Program is available for inspection by any employee or applicant for employment by contacting the EEO Manager at 214.341.2756.

**Invitation to Self-Identify for  
Individuals With Disabilities**

1. GRA 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. If you have a disability and would like to be considered under the affirmative action program, please tell us.
3. You may inform us of your desire to benefit under the program at this time and/or at any time in the future. This information will assist us in placing you in an appropriate position and in making accommodations for your disability.
4. Submission of this information is voluntary and refusal to provide it will not subject you to any adverse treatment. The information provided will be used only in ways that are not inconsistent with Section 503 of the Rehabilitation Act.
5. Information you submit about your disability will be kept confidential, except that (i) supervisors and managers may be informed regarding restrictions on the work or duties of qualified individuals with disabilities, and regarding necessary accommodations; (ii) first aid and safety personnel may be informed, when and to the extent appropriate, if the condition might require emergency treatment; and (iii) government officials engaged in enforcing laws administered by OFCCP or the Americans with Disabilities Act, may be informed.
6. If you are a qualified individual with a disability, we would like to include you under the affirmative action program. It would assist us if you tell us about (i) any special methods, skills, and procedures which qualify you for positions that you might not otherwise be able to do because of your disability so that you will be considered for any positions of that kind, and (ii) FOR CURRENT EMPLOYEES ONLY: the accommodations which we could make which would enable you 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.
7. A written copy of this Affirmative Action Program is available for inspection by any employee or applicant for employment, during normal business hours, by contacting Pete Dickson, the Vice President for in the Administration, at 214.341.2756 or [PeteD@GRAinc.com](mailto:PeteD@GRAinc.com).