

II. Identification of Problem Areas (41 CFR 60-2.17(b))

TLC Engineering for Architecture performs in-depth analysis of its total employment process to determine if there are areas where minority and/or female groups may face impediments to equal opportunity. The following analyses are conducted in order to reveal any potential problem areas:

1. **Placement Goals:** An analysis of incumbency versus availability is performed to determine whether there are problems of minority and/or female utilization. Whenever a problem exists, as defined by a statistical methodology, Placement Goals are set (see the Placement Goals report which follows this section).

Whether there are Placement Goals or not, steps will be taken to encourage and increase the percentage of qualified minorities and/or females applying for positions both externally and internally. These steps may include, but are not limited to the following:

- Working with hiring managers and recruiters to determine appropriate outreach to attract qualified applicant pools;
- Recruiting at colleges and universities with a significant percentage of minority and/or female students;
- Offering mentorship programs for minority and/or female employees;
- Offering job training to minorities and/or females currently employed by the company in order to increase their chances of advancement;
- Offering tuition reimbursement to employees to obtain training that will increase their chances of advancement;
- Using recruitment companies that specifically target minorities and/or females;
- and
- Continuing to use the services of the respective Employment Service Delivery System.

2. **Review of Employment Decisions:** A review of employment decisions is made in order to determine whether or not minorities and/or females are selected at a less favorable rate than non-minorities and/or males. A review of non-minorities and/or males is also conducted to determine if either group is being selected at a statistically significant lessor rate than minorities and/or females.
3. **Review of Hires/Promotions:** Whenever minorities and/or females are selected at a lower rate than non-minorities and/or males, a review of the applicant flow is conducted to determine possible reasons why minorities and/or females were not selected at a more favorable rate. If the company is attracting fewer than expected minorities and/or females that fit the qualifications for the job groups, good faith efforts will be put into place to attempt to improve the applicant flow of qualified minorities and/or females. If non-minorities and/or males are selected at a statistically significantly lessor rate than minorities and/or females, a review of the applicant flow and selection decisions is also made to ensure that there is no evidence of discrimination.
4. **Review of Terminations:** For terminations, if minorities and/or females are being involuntarily terminated or are voluntarily leaving at a higher rate than non-minorities and/or males, a review of the employee files will be made to ensure the company is applying its policies and procedures for termination equally for protected as well as non-protected classes. If non-minorities and/or males have a statistically significant higher rate of termination than minorities and/or females, an investigation will also be conducted to determine the cause.
5. **Compensation:** Compensation is reviewed at least annually in order to determine if there are significant discrepancies in pay when comparing female to male rates of pay and minority versus non-minority rates of pay. If discrepancies do exist, a thorough review is conducted to determine if the difference in pay is justified due to appropriate factors. If the difference in pay cannot be justified, TLC Engineering for Architecture will put a plan in place to bring pay into greater alignment.

Placement Goals Report

Plan: TLC,TLC - TLC, Engineering for Architecture

***There were no areas of underutilization in the Affirmative Action Program.
Therefore, no placement goals were set.***