



# SEC-OPS AFFIRMATIVE ACTION PROGRAM (AAP) FOR PROTECTED VETERANS AND INDIVIDUALS WITH DISABILITIES

**01 January -31 December 2023**



## **Policy Statement on Equal Employment Opportunity for Protected Veterans [41 C.F.R. § 60-300.44(a)] and Individuals with Disabilities [41 C.F.R. § 60-741.44(a)]**

### **TO ALL EMPLOYEES OF Sec-Ops, INC.:**

As the Chief Executive Officer of Sec-Ops, Inc. (Sec-Ops), I am committed to the principles of affirmative action and equal employment opportunity for protected veterans and individuals with disabilities. Therefore, it is the policy of Sec-Ops not to discriminate because of protected veteran status and to take affirmative action to employ and advance in employment qualified protected veterans and individuals with disabilities at all levels within the company. Sec-Ops will ensure that all employment actions, including but not limited to recruitment, hiring, selection for training, promotion, transfer, demotion, layoff, recall, termination, rates of pay or other forms of compensation, will be administered without regard to status as a protected veteran or an individual with a disability. Sec-Ops will also provide qualified applicants and employees who are disabled or disabled veterans with needed reasonable accommodations, as required by law, and will ensure that all employment decisions are based only on valid job requirements.

Sec-Ops prohibits harassment of employees and applicants because they are protected veterans or individuals with disabilities and will conduct training to try to prevent any harassment or discrimination before it occurs. Sec-Ops also prohibits retaliation against employees and applicants for filing a complaint, opposing any discriminatory act or practice, assisting, or participating in any manner in a review, investigation, or hearing or otherwise seeking to obtain their legal rights under any Federal, State, or local EEO law requiring equal employment opportunity for protected veterans. In addition, employees and applicants are protected from harassment, threats, coercion, intimidation, or discrimination for:

- 1) Filing a complaint;
- 2) Assisting or participating in an investigation, compliance review, hearing, or any other activity related to the administration of Section 4212, Section 503, or any other Federal, State, or local law requiring equal opportunity for protected veteran or individuals with disabilities;
- 3) Opposing any act or practice made unlawful by Section 4212, Section 503, or any other Federal, State or local law requiring equal opportunity for protected veterans and individuals with disabilities; or
- 4) Exercising any other right protected by Section 4212, Section 503.

Prohibited retaliation includes, but is not limited to, harassment, intimidation, threats, coercion, or other adverse actions that might dissuade someone from asserting their rights. In furtherance of Sec-Ops policy regarding affirmative action and equal employment opportunity, Sec-Ops has developed a written Affirmative Action Program (AAP) that sets forth the policies, practices, and procedures that Sec-Ops is committed to



ensure that its policy of nondiscrimination and affirmative action for qualified protected veterans is accomplished. This AAP is available for inspection by any employee or applicant for employment upon request, during normal business hours, in Sec-Ops Administrative offices and on the company website (employee resources service center). Interested personnel should contact the Human Resources Office for assistance.

To ensure employment opportunity and affirmative action throughout all levels of Sec-Ops, as the CEO, I am the EEO Officer and I have designated Sec-Ops Director of Administration as the Assistant Equal Employment Opportunity (AEEEO) Officer for Sec-Ops, Inc. Together we will maintain an internal audit and reporting system that will track and measure the effectiveness of Sec-Ops AAP and highlight where additional action is needed to meet Sec-Ops objectives.

The 2024 Protected Veteran Affirmative Action Plan is available at the corporate office and posted on the website for review. If you have any questions, please contact the office at 361-299-6767.

Yours sincerely,

Mr. Robert D. Lott  
President and CEO of Sec-Ops, Inc.



## **Sec-Ops Protected Veteran Affirmative and Individual with Disabilities Action Plan January 1, 2024 - December 31, 2024**

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### **III. Review of Personnel Processes [41 CFR 60-300.44(b), 41 CFR 60-741.44(b)]**

Sec-Ops reviews its employment procedures to ensure careful, thorough, and systematic consideration of the job qualifications of protected veterans and applicants with disabilities for job vacancies filled either by hiring or promotion, and for all training opportunities offered or available. This review ensures that personnel procedures do not stereotype protected veterans and individuals with disabilities in a manner that limits their access to all jobs for which they are qualified. Applicants and employees with disabilities have equal access to personnel processes, including those implemented through information and communication technologies.

To comply with the requirement to “periodically review” its personnel processes, Sec-Ops reviews its personnel processes annually to determine whether its present procedures assure careful thorough and systematic consideration of the qualifications of known protected veterans and individuals with disabilities. As part of this review, Sec-Ops also ensures that its personnel processes do not stereotype individuals with disabilities or protected veterans in a manner which limits their access to all jobs for which they are qualified. This review covers all procedures related to the filling of job vacancies either by hire or by promotion, as well as to all training opportunities offered or made available to employees. In conducting this review, Sec-Ops uses the procedures suggested in Appendix C to 41 C.F.R. § 60-300.

When an employee or applicant with a disability is rejected for employment, promotion, or training, a statement of the reason is appended to the personnel file along with a description of any reasonable accommodation considered. Likewise, when an employee or applicant is selected for hire, promotion, or training, and reasonable accommodation has been undertaken to enable the selection of an employee or applicant with a disability, the applicant form or personnel record contains a description of the reasonable accommodation.

Based upon Sec-Ops most recent review of its personnel processes, Sec-Ops has implemented the following modifications to its personnel processes to come into compliance:

#### **1. Ensure accessibility of personnel processes.**

Sec-Ops will ensure that applicants and employees who are disabled veterans have equal access to all of its personnel processes. Although it is not required to do so, as a best practice in furtherance of that commitment, Sec-Ops continues the process of making its job application, time sheets, and employee payroll information available via electronic systems that conform to the Web Content Accessibility Guidelines (WCAG 2.0) promulgated by the World Wide Web Consortium Web Accessibility Initiative. Most



items are completed and require final review for full implementation. Sec-Ops believes that taking these steps will help minimize the need for future reasonable accommodations and facilitate ready access to key systems for many applicants and employees with disabilities. Sec-Ops will ensure that human resources office contact information is prominently displayed to facilitate requests for reasonable accommodation from applicants with disabilities.

## **2. Invite all applicants to voluntarily self-identify as a protected veteran before an offer of employment is made.**

On May 1, 2014, Sec-Ops began inviting all applicants to voluntarily inform Sec-Ops that they are protected veterans before an offer of employment is made, in compliance with 41 CFR 60-300.42(a) in the manner prescribed by OFCCP. Sec-Ops will continue to invite applicants to self-identify as protected veterans post-offer in compliance with 41 CFR 60-300.42(b). Sec-Ops provides the self-id form it created using the model in Appendix B of 41 CFR 60-300 to all applicants along with Sec-Ops required paper application forms. Sec-Ops also created a separate electronic file where it stores all self-id information separate from employment applications, personnel records, and employee medical files.

## **3. Modify applicant flow logs.**

Sec-Ops recognizes that it must collect applicant and hiring data to comply with the requirements of 41 CFR 60-300.44(k). To facilitate the accurate tracking of applicants and hiring data for protected veterans, Sec-Ops has modified its applicant flow logs accordingly. (*See Part XI. A.*) Applicant flow logs will be maintained confidentially.

## **4. Documentation and Assessment of Outreach and Recruitment Activities**

Sec-Ops has always engaged in positive outreach and recruitment for protected veterans as required by OFCCP regulations. Sec-Ops has begun documenting each outreach and recruitment activity to comply with the requirements of the new VEVRAA regulations and will conduct an annual assessment to evaluate the effectiveness of the totality of our outreach and recruitment efforts, as required by 41 CFR 60-300.44(f) and 41 CFR 60-741.44(f). Sec-Ops will institute procedures to comply with the requirements of these parts and will conduct its annual assessment with data collected during the 2023 AAP year, starting in 2024.

Sec-Ops will evaluate the results of each outreach and recruitment activity using the following criteria, which includes data collected under 41 CFR 60-300.44(k) and 41 CFR 60-741.44(k), to see if it is producing measurable results:

1. To what extent did the activity attract qualified protected veterans or persons with disabilities?
2. To what extent did the activity result in the hiring of qualified protected veterans or persons with disabilities?



3. To what extent did the activity expand Sec-Ops outreach to protected veterans or persons with disabilities in the community?
4. To what extent did the activity increase Sec-Ops capacity/capability to include protected veterans or persons with disabilities in its workforce?

Sec-Ops will utilize the same criteria to conduct its annual assessment of the totality of its outreach and recruitment efforts. If Sec-Ops concludes that the totality of its efforts were not effective in identifying and recruiting qualified protected veterans or persons with disabilities, Sec-Ops will explore and implement alternative outreach and recruitment methods. Sec-Ops will document its outreach and recruitment activities and its assessments of these activities and retain these documents for three years.

#### **IV. Review of Physical and Mental Job Qualification Standards [41 CFR 60-300.44(c), 41 CFR 60-741.44(c)]**

To comply with the requirement to “periodically review” its physical and mental job qualification standards, Sec-Ops will review the physical and mental job qualifications of each job opening before it is publicly posted to ensure that we do not screen out qualified disabled veterans and qualified individuals with disabilities as they are related to the job(s) in question and consistent with business necessity and the safe performance of the job. Sec-Ops will conduct a periodic review of all job qualification standards every three years (except for those job qualification standards that Sec-Ops has reviewed within the previous twelve months) to ensure we do not screen out qualified individuals with disabilities, all requirements are job-related and consistent with business necessity. The last review was completed on September 25, 2023.

Appropriately trained personnel conducted the review and identified no physical or mental job qualification requirements that are likely to screen out qualified disabled veterans. Nevertheless, to ensure our compliance, Sec-Ops strives to use only job qualification standards that are job-related and consistent with business necessity. The review found all job qualification requirements to be job related and consistent with Business necessity and safety. Where required all job requirements meet the contract standards set forth in the client contracts.

Sec-Ops assures that the requirements are related to the specific job(s) for which the individual is being considered and are consistent with business necessity and the safe performance of the job. Sec-Ops will continue to review physical and mental job qualification requirements whenever a job vacancy is filled through either hiring or promotion and will conduct a qualification review whenever job duties change. When protected veterans are considered for employment, only that portion of the individuals' military records, including discharge papers, that is relevant to the requirements of the position will be considered.





Some pre-employment physical examinations or medical questionnaires are used in Sec-Ops hiring process based on assignment to specific contracts. Sec-Ops affirms that such inquiries or exams are conducted in accordance with the VEVRAA regulations, and that information obtained as a result of the inquiry or exam will be kept confidential, except as otherwise provided for in the VEVRAA regulations. The results of the examination or inquiry will only be used in accordance with the VEVRAA regulations.

## **V. Reasonable Accommodation [41 CFR 60-300.44(d), 41 CFR 60-741.44(d)]**

Sec-Ops will continue its longstanding commitment to making reasonable accommodation to the known physical or mental limitations of qualified disabled veterans unless such accommodation would impose an undue hardship on the conduct of its business. When an employee known to be a disabled veteran or an employee with a known disability has significant difficulty performing his or her job, and it is reasonable to conclude that the performance problem may be related to the known disability, the employee is confidentially notified of the performance problem, and asked if the problem is related to the disability. If the employee indicates that the performance problems are related to his or her disability, the employee is asked if reasonable accommodation is needed.

Sec-Ops also commits to engaging in an interactive process with the person requesting the accommodation (or their representative), as needed, to determine appropriate accommodation. Undue hardship will be determined by assessing whether the requested accommodation, and any other potential accommodation, would cause significant difficulty or expense, as provided for in the VEVRAA regulations.

Sec-Ops will also ensure that all requests for reasonable accommodation and any medical or disability related information provided to Sec-Ops will be treated as confidential medical records and maintained in a separate medical file.

Because Sec-Ops strives to be a model employer, it is currently drafting reasonable accommodations procedures using the guidance in Appendix B of the Section 503 disability regulations at 41 CFR Part 60-741.

## **VI. Anti-Harassment Procedures [41 CFR 60-300.44(e), 41 CFR 60-741.44(e)]**

Employees and applicants of Sec-Ops will not be subject to harassment because of protected veteran status.

Any employee or applicant who believes that they have been subject to harassment because of their status as a protected veteran should promptly contact a manager in





their chain of command, or promptly contact the Director of Human Resources at 361-299-6767 for assistance. Employees or applicants may also file a written complaint with the office of the Director of Human Resources, 1721 S. Brownlee Blvd Corpus Christi, TX 78404. Retaliation, including intimidation, threat, coercion, or discrimination, 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 protected veterans is prohibited. Any employee or applicant who believes that they have been subject to retaliation should contact the Human Resources Manager at 361-299-6767 for assistance. This anti-harassment policy is communicated to all employees and managers annually via e-mail.

Additionally, training is provided on the identification and prevention of harassment based on protected veteran status to all Sec-Ops Supervisors with notification to employees. Furthermore, Sec-Ops monitors its environment for the presence of any forms of harassment, intimidation, or coercion and, where warranted, takes corrective action.

#### **VII. External Dissemination of Policy [41 CFR 60-300.44(f), 41 CFR 60-741.44(f)]**

Sec-Ops will provide written notification of our Equal Employment Opportunity and Affirmative Action policy regarding the employment of protected veterans to all current subcontractors when subcontracts are established and annually during renewal and will continue to do so on an as completed basis. Sec-Ops will also provide such written notification to new subcontractors, vendors, and suppliers upon entering a relationship with them. Sec-Ops has informed its recruiting sources, including State employment agencies, local employment service delivery systems, educational institutions, and social service agencies, of the company's policy concerning the employment of qualified protected veterans and will notify them of employment opportunities as they become available. Sec-Ops requests our utilized recruiting sources to actively recruit and refer qualified persons for job opportunities.

A copy of Sec-Ops Affirmative Action Policy for qualified protected veterans is provided on our website annually. Sec-Ops will include the equal opportunity clause concerning the employment of qualified protected veterans in all non-exempt subcontracts and purchase orders.

#### **VIII. Outreach and Positive Recruitment [41 CFR 60-300.44(f), 41 CFR 60-741.44(f)]**

##### **a. SEC-OPS Outreach and Positive Recruitment Activities**



Outreach/Recruitment Activity	Date of Activity	Description	Evaluation of Each Activity
TAMP Contacts	None	None	0 Contacts
Indeed Job Postings	Feb/April/Jun 2023	Security Guards	39 Contacts
WY Workforce	August 2023	Security Guards	0 Contacts
Walk-ins	Jan-Dec 2023	Security Guards	35 Contacts

#### Criteria for Evaluation:

1. To what extent did the activity attract qualified applicants who are protected veterans? From Indeed, *We received 6 contacts, 6 were hired. Walk-ins included 2 contacts that were hired.*
2. To what extent did the activity result in the hiring of qualified protected veterans? *We successfully hired 8 personnel, keeping our annual percentage above the established benchmark. Out of 60 new hires, 8 were veterans, achieving 13.3% of new hires.*
3. To what extent did the activity expand the outreach to protected veterans in the community? *None, as our benchmark was exceeded.*
4. To what extent did the activity increase our capacity/capability to include protected veterans in its applicant pool and workforce? *No increase was necessary as we exceeded expectations.*

#### **b. Future Assessment of External Outreach and Recruitment Efforts [41 CFR 60-300.44(f)(3), 41 CFR 60-741.44(f)(3)]**

Sec-Ops will begin assessing its outreach and recruitment efforts annually starting in 2024 and will document such assessment for inclusion in Sec-Ops 2024 AAP. This will include an assessment of the effectiveness of each individual effort, as an assessment of the effectiveness of the totality of our efforts for the year. Sec-Ops currently has applicants and hiring data for protected veterans. We perform a limited assessment of the effectiveness of our outreach and recruitment efforts at this time as we meet our benchmark for the percentage of veteran employment. Starting in 2024, Sec-Ops will evaluate our benchmark percentage and based on totals, we may increase percentages based on our capability to sustain veteran numbers. We continue to perform an assessment of whether our efforts are effective in recruiting protected veterans into our workforce. Sec-Ops will start documenting its outreach and recruitment efforts and maintain future documents, including the written assessments of the effectiveness of these efforts, for three years, in accordance with 41 CFR 60-300.44(f)(4) and 41 CFR 60-741.44 (f).

Outreach and recruitment activities that may be undertaken as needed by Sec-Ops include enlisting the assistance and support of the following persons and organizations in recruiting, and developing on-the-job training opportunities for protected veterans



and individuals with disabilities, in order to fulfill its commitment to provide equal employment opportunity for such individuals:

- The Local Veterans' Employment Representative in the local employment service office (One-Stop) nearest our establishment;
- The Department of Veterans Affairs Regional Office nearest our establishment;
- The veterans' counselors and coordinators ("Vet-Reps") on A&M and Del Mar college campuses;
- The service officers of the national veterans' groups active in the area of our establishment;
- Local veterans' groups and veterans' service centers near our establishment;
- The Department of Defense Transition Assistance Program (TAP), or any subsequent program that, in whole or in part, might replace TAP; and
- Any organization listed in the Employer Resources section of the National Resource Directory (<http://www.nationalresourcedirectory.gov/>), or any future service that replaces or complements it.
- The State Vocational Rehabilitation Service Agency (SVRA), State mental health agency, or State developmental disability agency in the area of our establishment;
- Any Employment One-Stop Career Center (One-Stop) or American Job Center nearest our establishment;
- The Department of Veterans Affairs Regional Office nearest our establishment ([www.va.gov](http://www.va.gov));

#### **IX. Internal Dissemination of Policy [41 CFR 60-300.44(g)]**

Sec-Ops has developed internal procedures to communicate its obligation to engage in affirmative action efforts to employ and advance in employment qualified protected veterans. Sec-Ops procedures are designed to foster understanding, acceptance, and support among all employees and to encourage them to help meet this obligation.

Sec-Ops makes copies of its AAP available for inspection to any employee or applicant upon request. Sec-Ops also incorporates the company's affirmative action and equal employment opportunity policies into the Corporate Policy Manual and updates this manual as needed. The policies are posted on our website for all employees to review annually and discussed in employee orientation. Additionally, our affirmative action policy and EEO poster are placed on bulletin boards located throughout our facilities and office work areas, and electronic versions of these notices are posted and clearly labeled on the company web site. Sec-Ops managers and supervisors are provided with affirmative action and EEO training.

#### **X. Audit and Reporting System [41 CFR 60-300.44(h)]**

The CEO and the Director of Administration have the responsibility for developing and preparing the formal documents of the AAP. The Sec-Ops core management team is



responsible for the effective implementation of the AAP. Sec-Ops audit and reporting system ensures that:

- 1) Measures the effectiveness of the affirmative action program.
- 2) Indicates any need for remedial action.
- 3) Determines the degree to which the objectives have been attained.
- 4) Determines whether protected veterans and individuals with known disabilities have the opportunity to participate in all company sponsored educational, training, recreational, and social activities.
- 5) Measures compliance with the affirmative action program's specific obligations.

Where the affirmative action program is found to be deficient, corrective action is taken to bring the program into compliance.

Sec-Ops conducts an annual audit of personnel activities to ensure such activities are free from discrimination against, or stereotyping of, protected veterans or persons with disabilities in any manner. The results of most recent self-audit are included in Part XI.

A. During the self-audit, the following activities are reviewed:

- Recruitment, advertising, and job application procedures;
- Implementation of hiring, promotion, upgrading, award of tenure, layoff, and recall from layoff practices;
- Rates of pay and any other forms of compensation including fringe benefits;
- Job assignments, job classifications, and job descriptions;
- Implementation of reasonable accommodation policies and procedures;
- Awarding of sick leave, leaves or absence, or implementation of any other leave policies;
- Participation in training, mentoring, or apprenticeship programs, and attendance at professional meetings and conferences; and
- Application of any other term, condition, or privilege of employment, including participation in company-sponsored educational, training, recreational, and social activities.

The CEO has also directed the management team to submit any instance documenting our efforts to comply with its EEO/AAP responsibilities, discussing any identified EEO/AAP problem areas along with recommended remedial actions, and providing an update regarding the status of our AAP objectives. Managers and supervisors are asked to report any current or foreseeable EEO problem areas to the CEO and are asked to outline their suggestions or recommendations for solutions.

The following documents are maintained as a component of our internal audit process:

1. Documentation of self-audit;



2. Summary data of personnel activity including external job offers and hires, promotions, resignations, terminations, and layoffs relating to protected veterans [withheld from distribution or public inspection to ensure confidentiality]; and
3. An applicant flow log showing the name, race, ethnicity, sex, protected veteran status, date of application, job title, interview status and the action taken for all individuals applying for job opportunities [withheld from distribution or public inspection to ensure confidentiality].

## **XI. Supporting Data**

### **a. SEC-OPS Self-Audit**

<b>VEVRAA AAP Component</b>	<b>Requirements</b>	<b>Date last inspected for compliance and Results of Inspection (Compliant (C)/Not Compliant (NC))</b>	<b>Follow-on or remedial actions</b>
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#### **Invitation to self-identify at the pre/post-offer stage (41 CFR 60-300.42(a))**

Sec-Ops maintains an applicant flow log to track veteran applicants. **(Compliant)**

#### **Policy Statement (41 CFR 60-300.44(a), 41 CFR 60-741.44 (a))**

Sec-Ops reviewed the items below and met all requirements. **(Compliant)**

Policy Statement posted on bulletin boards.

Policy Statement made available, as needed, in a form that is accessible and understandable to disabled veterans.

Policy Statement contains required non-discrimination and nonretaliation statements.

Policy Statement indicates top executive support for AAP.

#### **Review of Personnel Processes (41 CFR 60-300.44(b), 41 CFR 60-741.44 (b)) (Compliant)**

Sec-Ops CEO and management staff conduct periodic review of personnel processes and policy documents to ensure we maintain compliance and ensure we do not screen out qualified individuals.

#### **Physical and Mental Qualifications (41 CFR 60-300.44(c), 41 CFR 60-741.44 (c)) (Compliant)**

Provide and adhere to a schedule for reviewing all physical and mental qualification standards in the AAP.

Ensure the standards are job-related and consistent with business necessity.

#### **Reasonable Accommodation (41 CFR 60-300.44(d), 41 CFR 60-741.44 (d)) (Compliant)**

Provides reasonable accommodation to the known physical and mental limitations of otherwise qualified disabled veterans absent undue hardship.

Note: If employees who are known disabled veterans or persons with disabilities experience performance difficulties that may be related to the disability, Sec-Ops confidentially informs the employee of the issue, asks if it is related to the disability and, if so, ask if the employee needs an accommodation.

#### **Harassment (41 CFR 60-300.44(e), 41 CFR 60-741.44 (e)) (Compliant)**



Sec-Ops has developed and implemented procedures to ensure employees are not harassed on the basis of protected veteran or persons with disabilities status and provided those procedures in the AAP.

**External dissemination of policy, outreach, and positive recruitment (41 CFR 60-300.44(f), 41 CFR 60-741.44 (f))**

Sec-Ops will perform outreach and positive recruitment activities that are reasonably designed to effectively recruit qualified protected veterans or persons with disabilities. **(Compliant)**

Sec-Ops will document the outreach and recruitment activities and retain such documents for a period of three years. **(Compliant)**

Assess Sec-Ops outreach and recruitment activity, and assess the effectiveness of the results of the activities: **(Compliant)**

**Internal Dissemination of Policy (41 CFR 60-300.44(g), 41 CFR 60-741.44 (g))**

Sec-Ops includes its affirmative action policy in the corporate policy manual and makes it available to all employees both in the office and online. **(Compliant)**

**Audit and Reporting System (41 CFR 60-300.44(h), 41 CFR 60-741.44 (h))**

Sec-Ops has designed and implemented an audit and reporting system that: (a) measures the effectiveness of our AAP, (b) indicates any need for remedial action, (c) determines whether our affirmative action objectives have been reached, (d) determines whether known protected veterans or persons with disabilities have had the opportunity to participate in all company sponsored educational, training, recreational and social activities, (e) and measures our compliance with the AAP's specific objectives.

Sec-Ops documents the actions it takes to comply with audit and reporting system obligations and retains these documents as employment records. Sec-Ops is committed to undertake necessary action to bring AAP into compliance if it finds any deficiencies.

**Responsibility for Implementation (41 CFR 60-300.44(i), 41 CFR 60-741.44 (i))**

Sec-Ops CEO has the responsibility for implementation of its AAP activities whose identity appears on all internal and external communications regarding the AAP and is supported by the management team and staff to implement the AAP.

**Training (41 CFR 60-300.44(j), 41 CFR 60-741.44 (j))**

Sec-Ops trains all personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes to ensure the commitments in the AAP are carried out.

**Data Collection Analysis (41CFR 60-300.44(k), 41 CFR 60-741.44 (k)) (Compliant)**

Sec-Ops documents the following computations or comparisons pertaining to applicants and hires on an annual basis and maintains them for a period of three years:

1. *The number of applicants who self-identified as protected veterans at the pre-offer stage of SEC-OPS's employment process;*
2. *The total number of job openings;*
3. *Total number of jobs filled;*
4. *The total number of applicants for all jobs;*
5. *The number of protected veteran applicants hired;*
6. *The total number of applicants hired.*





## Hiring Benchmarks (41 CFR 60-300.45, 41 CFR 60-741.45)

Sec-Ops establishes a hiring benchmark using the national percentage of veterans or persons with disabilities in the civilian labor force provided by OFCCP and will use the percentage in its assessment of the effectiveness of our outreach and recruitment efforts towards protected veterans.

Sec-Ops, Inc. Workforce Analysis 2024																	Veteran	Disability	
Job Group:1					Males						Females								
Job Title	Wage Rate	EEO-1 Category	Job Group	Total Employees	Total	White	Hispanic	Black	American Indian/AN	Asian /PI	Total	White	Hispanic	Black	American Indian/AN	Asian/ PI			
Admin Dir		Administrative Support	1	1							1		1				0	0	
HR Manager		Administrative Support	1	1							1		1				0	0	
Job Group Total				2							2		2				0	0	
Job Group: 2					Males						Females						Veteran	Disability	
Job Title	Wage Rate	EEO-1 Category	Job Group	Total Employees	Total	White	Hispanic	Black	American Indian/AN	Asian /PI	Total	White	Hispanic	Black	American Indian/AN	Asian/ PI			
Operations	S	First/Mid Level	2	1	1	1													1
Project Managers	SH	First/Mid Level	2	3	3	3													
Supervisors	SH	First/Mid Level	2	6	2		1			1	4	1	3				1	0	
Job Group Total				10	6	4	1	0	0	1	4	1	3	0	0	0	2	1	
Job Group: 3					Males						Females						Veteran	Disability	
Job Title	Wage Rate	EEO-1 Category	Job Group	Total Employees	Total	White	Hispanic	Black	American Indian/AN	Asian /PI	Total	White	Hispanic	Black	American Indian/AN	Asian/ PI			
LEU	S	Officials and Managers	3	1	1	1													1
COC	O	Officials and Managers	0	1	1	1											0	0	
WY OPS	S	Officials and Managers	3	1	1	1											1	1	
Job Group Total				3	3	3	0	0	0	0	0	0	0	0	0	0	0	2	2
Job Group: 4					Males						Females						Veteran	Disability	
Job Title	Wage Rate	EEO-1 Category	Job Group	Total Employees	Total	White	Hispanic	Black	American Indian/AN	Asian /PI	Total	White	Hispanic	Black	American Indian/AN	Asian/ PI			
ESS	H	Service Worker	4	2	2	1	1												1
Security GD L2	H	Service Worker	4	74	63	30	27	4		2	11	3	8				23	1	
Security GD L3	H	Service Worker	4	84	72	40	26	4		2	12	6	5			1	27	5	
Job Group Total				160	137	71	54	8	0	4	23	9	13	0	0	1	51	7	

## b. Personnel Activity (establishment-wide)

[Withheld from distribution or public inspection to ensure confidentiality]

Job Group	Hires		Applicants		Promotions – Into Job Group		Terminations		Layoffs		Recalls	
	Total	Vet	Total	Vet	Total	Vet	Total	Vet	Total	Vet	Total	Vet
1	0	0	0	0	0	0	0	0				
2	0	0	0	0	0	0	0	0				
3	0	0	0	0	0	0	0	0				
4	60	8	75	8	12	1	74	3				

## c. Applicant flow log [Withheld from distribution or public inspection to ensure confidentiality]

Name	Race/Ethnicity	Sex	VET (Y/N)	Date of Application	Job Title	Interview (Y/N)	Action Taken (H/NH) <sup>3</sup>	Date Action Taken
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(Submitted Separately)





## **XII. Responsibility for Implementation of AAP [41 CFR 60-300.44(i), 41 CFR 60-741.44(i)]**

The CEO, Director of Administration and the Human Resources Manager are designated to direct the activities of the affirmative action program. The team has the responsibility for designing and ensuring the effective implementation of the AAP. These responsibilities include, but are not limited to:

1. The development of the AAP for protected veterans or persons with disabilities, 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 the affirmative action obligations.
3. Reviewing the qualifications of all applicants and employees considered/eligible for hiring promotion, transfer, or layoff/reduction in force to ensure qualified protected veterans or persons with disabilities are treated in a nondiscriminatory manner when hiring, promotion, transfer, or layoff/reduction in force occur.
4. Developing solutions for any identified problem areas.
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 staff informed of equal opportunity progress and problems within the company through as needed reports.
7. Providing site managers with copies of the Affirmative Action Program (minus the items withheld from dissemination for confidentiality reasons) 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 protected veterans or persons with disabilities with all managers and supervisors at all levels to ensure that the policy is understood and is followed in all personnel activities.
9. Ensure that career development of employees who are protected veterans or persons with disabilities is equal to that of other employees.
10. Auditing the contents of company bulletin boards to ensure that required information is posted and up-to-date.
11. Serving as a liaison between Sec-Ops and enforcement agencies; and
12. Serving as a liaison between Sec-Ops and outreach and recruitment sources for protected veterans or persons with disabilities.

## **XIII. EEO and Affirmative Action Training [41 CFR 60-300.44(j), 41 CFR 60-741.44 (j)]**

Managers, supervisors, and human resources staff involved in recruiting, screening, selection, promotion, disciplinary, and other related employment processes receive training regarding AAP and their role in its implementation.



During the training, managers and supervisors are advised of their responsibilities under the AAP for protected veterans or persons with disabilities and of their obligations to:

- Assist in the identification of problem areas, formulate solutions, and implement corporate goals and objectives when necessary;
- Ensure qualified applicants and employees who are protected veterans or persons with disabilities are treated in a nondiscriminatory manner in all employment practices, including when making selection decisions, such as for hire, promotion, training, or to receive awards or bonuses;
- Provide reasonable accommodation to the known physical or mental limitations of qualified disabled veterans or persons with disabilities unless such accommodation would impose an undue hardship on the conduct of its business;
- Maintain confidentiality of any information regarding self-identification of protected veteran or persons with disabilities status; and
- Ensure that nondiscrimination is adhered to in all personnel activities.

#### **XIV. Applicant and Hiring Data [41 CFR 60-300.44(k), 41 CFR 60-741.44(k)]**

[Withheld from distribution or public inspection to ensure confidentiality]

Sec-Ops collects employee data pertaining to protected veterans or persons with disabilities in order to assess the effectiveness of the company's outreach and recruitment efforts. Sec-Ops invites applicants to voluntarily inform the company whether they believe they are protected veterans in compliance with the VEVRAA requirements.

#### **XV. Hiring Benchmarks [41 CFR 60-300.45, 41 CFR 60-741.45]**

##### **a. Establishment of Hiring Benchmark**

Sec-Ops has adopted the national percentage of protected veterans or persons with disabilities in the civilian labor force provided by OFCCP, currently 5.4% veterans and 7% disabilities, as its hiring benchmark for the 2024 AAP year. In its AAP update on September 25, 2023, Sec-Ops measured its success in hiring protected veterans during the course of this AAP year based on this benchmark and use that analysis as one of the criteria in its assessment of the effectiveness of its outreach and recruitment efforts.

##### **b. Utilization Goals for individuals with Disabilities**

The OFCCP establishes a utilization goal for employment of qualified Individuals with disabilities for each job group in our workforce, or for our entire workforce where the workforce consists of 100 or less employees. The utilization goal is not a rigid and inflexible quota that must be met, nor is it to be considered either a ceiling or a floor for the employment of a particular group. The purpose of the utilization goal is to establish



a benchmark against which Sec-Ops must measure the representation of individuals within each job group in its workforce, or within our entire workforce. Sec-Ops evaluates its utilization of individuals with disabilities in each job group, or in its entire workforce.

Utilization Summary of Individuals with Disabilities					
	Employees	Disabled	Disabled Availability %	Disabled Utilization %	Met Goal?
Job Group					
1	2	0	0	0	No
2	10	1	10	10	Yes
3	3	2	66.6	66.6	Yes
4	160	7	4.4	4.4	No

#### IDENTIFICATION OF PROBLEM AREAS 41 CFR Section 60-741.45(e)

When the percentage of individuals with disabilities in one or more job groups, or in our entire workforce if the workforce is 100 or less employees, is less than the utilization goal, Sec-Ops takes steps to determine whether and where impediments to equal employment opportunity exist. When making this determination, we assess our personnel processes, the effectiveness of our outreach and recruitment efforts, the results of our affirmative action program audit, and any other areas that might affect the success of the affirmative action program.

Sec-Ops has not found any impediments to equal employment opportunity in our personnel processes, outreach, and recruitment efforts or any other area that might affect the success of our affirmative action program.

#### ACTION ORIENTED PROGRAMS 41 CFR Section 60-741.45(f)

As needed, Sec-Ops develops action-oriented programs designed to correct any identified problems areas. These action-oriented programs may include the modification of personnel processes to ensure equal employment opportunity for individuals with disabilities, alternative or additional outreach and recruitment efforts, and/or other actions designed to correct the identified problem areas and attain the established goal.

Sec-Ops has not identified any problem areas based on qualifications required to fill Job Category 4 and availability of licensed service workers.



### ***Why Sec-Ops, Inc. will hire Veterans?***

As a Service-Disabled Veteran owned company, we realize there are compelling business cases to hiring veterans:

1. Hiring vets builds goodwill and honors their service.
2. Recruiting veterans reflects the social responsibility of an employer and builds goodwill with customers, employees, and the community.
3. Hiring veterans who have sacrificed for their communities and the nation is the right thing to do. Veterans bring distinctive capabilities to civilian employers...

Accountability: superior personal and team accountability. Veterans understand how policies and procedures help an organization function.

Adaptability: experience operating in ambiguous situations, exhibiting flexibility in fluid environments.

Team players: ability to understand the capabilities and motivations of each individual, regardless of background, to maximize team effectiveness.

Experienced leadership: battle-tested leadership, from the front and by example. Ability to inspire devoted followership and lead groups to accomplish unusually high aspirations.

Self-reliance: demonstrated initiative, ownership, and personal responsibility while leveraging all available assets and team members to ensure success.

Perseverance: proven resilience getting things done despite difficult conditions, tight deadlines, and limited resources.

Strong work ethic: belief in the value of hard work and taking initiative.

Value-driven: proven experience dedicating themselves to a cause. Veterans take pride in the mission, values, and success of the organization.

Objective-focused: ability to organize and structure resources to accomplish the mission, regardless of roadblocks.

Quick learners: proven ability to learn new skills quickly and efficiently.

High impact decision-makers: strong situational awareness, ability to understand complex interdependencies and make decisions using practical judgment and creativity.

Diverse perspectives: experience having impact and influencing people across the boundaries of culture, language, ethnicity, and personal motivation.



Worksheet: Normally withheld.

Sec-Ops, Inc. Workforce Analysis 2024																			
Job Group:1					Males						Females						Veteran	Disability	
Job Title	Wage Rate	EEO-1 Category	Job Group	Total Employees	Total	White	Hispanic	Black	American Indian/AN	Asian /PI	Total	White	Hispanic	Black	American Indian/AN	Asian/ PI			
Admin Dir		Administrative Support	1	1							1		1				0	0	
HR Manager		Administrative Support	1	1							1		1				0	0	
Job Group Total				2							2		2				0	0	
Job Group: 2					Males						Females						Veteran	Disability	
Job Title	Wage Rate	EEO-1 Category	Job Group	Total Employees	Total	White	Hispanic	Black	American Indian/AN	Asian /PI	Total	White	Hispanic	Black	American Indian/AN	Asian/ PI			
Operations Project Managers	S	First/MidLevel	2	1	1	1											1	1	
	S/H	First/MidLevel	2	3	3	3													
Supervisors	S/H	First/MidLevel	2	6	2		1			1	4	1	3				1	0	
Job Group Total				10	6	4	1	0	0	1	4	1	3	0	0	0	2	1	
Job Group: 3					Males						Females						Veteran	Disability	
Job Title	Wage Rate	EEO-1 Category	Job Group	Total Employees	Total	White	Hispanic	Black	American Indian/AN	Asian /PI	Total	White	Hispanic	Black	American Indian/AN	Asian/ PI			
CEO	S	Officials and Managers	3	1	1	1											1	1	
COO	S	Officials and Managers	3	1	1	1											0	0	
WY OPS	S	Officials and Managers	3	1	1	1											1	1	
Job Group Total				3	3	3	0	0	0	0	0	0	0	0	0	0	0	2	2
Job Group: 4					Males						Females						Veteran	Disability	
Job Title	Wage Rate	EEO-1 Category	Job Group	Total Employees	Total	White	Hispanic	Black	American Indian/AN	Asian /PI	Total	White	Hispanic	Black	American Indian/AN	Asian/ PI			
ESS	H	Service Worker	4	2	2	1	1										1	1	
Security GD L2	H	Service Worker	4	74	63	30	27	4		2	11	3	8				23	1	
Security GD L3	H	Service Worker	4	84	72	40	26	4		2	12	6	5			1	27	5	
Job Group Total				160	127	71	54	8	0	4	23	9	13	0	0	1	51	7	