AFFIRMATIVE ACTION PLAN

FOR MINORITIES & WOMEN

Johns Hopkins Health System Corporation

Baltimore, MD

January 1, 2011 - December 31, 2011

_______________________________________
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_______________________________________
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PREFACE

Johns Hopkins Health System Corporation (also referred to as the Hospital) is fully committed to the concept and practice of equal opportunity and affirmative action in all aspects of employment.

In the preparation of this AAP, the Hospital has used the terminology used in E.O. 11246 and it’s implementing regulations as a guide. Therefore, the use of such terms as "underutilization," "deficiency," "concentration," "affected class," "goal," "problem area," etc. should not be construed as an admission by the Hospital, in whole or in part, that any problem area exists or that either minorities or women have been or are presently being underutilized, concentrated, or discriminated against in any way by the Hospital in violation of federal, state, or local fair employment practice laws. Furthermore, nothing contained in this AAP or its supporting data should be construed as an admission by the Hospital, in whole or in part, that it has contravened such federal, state, or local employment practice laws.

In developing and implementing the AAP, the Hospital has been guided by its established policy of providing equal employment opportunity. Any placement goals that the Hospital has established herein are not intended as rigid, inflexible quotas that must be met, but rather as targets reasonably attainable by applying every good faith effort in implementing this AAP. The use of placement goals in this AAP is not intended, nor is the effect of such placement goals intended, to discriminate against an individual or group of individuals with respect to any employment opportunities for which he, she, or they are qualified on the grounds that he, she, or they are not the beneficiaries of affirmative action themselves. Nothing herein is intended to sanction the discriminatory treatment of any person. Indeed, all employment decisions at the Hospital are made based on job-related criteria. Thus, this AAP has been developed in strict reliance upon the Guidelines on Affirmative Action issued by the Equal Employment Opportunity Commission (EEOC) (29 C.F.R. Part 1608).

While Johns Hopkins Health System Corporation firmly believes in wide dissemination of its affirmative action policies and equal employment opportunity practices, this AAP contains certain proprietary information relating to Hospital’s business that must be kept confidential. The detailed information provided in good faith as a part of the AAP contains specific information that, if disseminated, could be detrimental to the competitive and business interests of this Johns Hopkins Health System Corporation. At a minimum, the complexity of this data is subject to misinterpretation and misuse, which again can be very harmful to business goals and objectives solely unrelated to the affirmative action and equal employment opportunity concept.

Therefore, even though the Hospital is justifiably proud of the progress and placement goals that are described in the following pages, this AAP and its support data are to be disclosed only to individuals, companies and government agencies only where such individuals or entities have a legitimate business interest or legal entitlement to the information. Johns Hopkins Health System Corporation specifically requests the following:

1. If this information is submitted to the Office of Federal Contract Compliance Programs (OFCCP) pursuant to the relevant Executive Order and regulations, it is to be considered confidential and not subject to disclosure without notifying Johns Hopkins Health System Corporation of the agency's decision to disclose and providing the Hospital with ample time to contest the disclosure.

2. If this information is supplied to another government contractor, EEOC representative, or any other person who is given access to the AAP, it is not to be copied, reproduced, or disclosed.
without prior notification to Johns Hopkins Health System Corporation.

3. No information contained in the AAP is to be copied, removed from the premises, or released to other individuals without prior notification to Johns Hopkins Health System Corporation.

4. All monitoring system reports as required by federal regulations and laws have been completed. Reports that require specific data such as names of employees and salary information are not an official part of this AAP. This information is on file at the Hospital as Documentation and Supporting Data for AAP Reports and is available for review only as required by law.

The material set forth in this AAP is deemed to include personnel files, investigatory records, trade secrets, confidential operations information, confidential statistical data and other confidential commercial and financial data, within the meaning of the Freedom of Information Act (5 U.S.C. Section 552), Title VII of the Civil Rights Act of 1964 (as amended) (42 U.S.C. Sections 2000e et seq.), and the Trade Secrets Act (18 U.S.C. Section 1905, and 44 U.S.C. Section 3508), the disclosure of which is prohibited by law and would subject the individual making the disclosure to criminal and/or civil sanctions.

This AAP does not constitute an express or implied contract between the Hospital and its employees, job applicants, or other persons. Nothing in this AAP provides any individual or group with a private right of action against Johns Hopkins Health System Corporation.
INTRODUCTION

Ever committed to affirmative action, Johns Hopkins Health System Corporation has prepared this AAP to cover employees reporting to and/or working in Baltimore, MD. This plan also covers employees working in other establishments who report to managers included in this plan. In accordance with 41 C.F.R. 60-2.1, employees included in AAPs other than where they are located are listed in the annotated employee list reports. These reports identify the actual location of such employees.

As detailed in the Job Group Analysis, this AAP covers 1422 employees including 589 (41.42%) minorities and 1024 (72.01%) women. It is expected that these employees will help us to reach mutual goals of profitability and efficiency, resulting in both business and personal growth. As described in detail in the Plan that follows, the management of Johns Hopkins Health System Corporation has a continuing commitment to the practice and implemented action of this AAP.
RESPONSIBILITY FOR IMPLEMENTATION  
In accordance with 41 C.F.R. 60-2.17

Ronald R. Peterson, President, has overall responsibility for implementation of the Equal Employment Opportunity Policy and the AAP. The Hospital has assigned primary management responsibility and accountability for ensuring full compliance with the plan to Beverly White-Seals, Esq., an official of the Hospital. The Affirmative Action Officer has the authority, resources, support of and access to top management necessary to ensure the effective implementation of the AAP. The President actively supports the program and provides assistance whenever it is needed, making managers and supervisors aware of the program and requesting their cooperation and assistance. The name of the Affirmative Action Officer appears on internal and external communications on the Hospital's Equal Employment Opportunity Policy and AAP.

1. The duties of the Affirmative Action Officer include:

   A. Developing policy statements, AAP methods, and internal and external communication techniques. Affirmative action policies and procedures will continue to be developed to ensure an efficient yet positive interaction between the Affirmative Action Officer and the managers charged with employment responsibility.

   B. Assisting in the identification of problem areas, and developing strategies to eliminate any problems identified.

   C. Assisting line management and supervisors in devising solutions to equal employment problems, including counseling and training, to ensure full understanding of affirmative action and EEO policies and procedures.

   D. Designing and implementing monitoring and reporting methods that will:

      • Measure the effectiveness of the Hospital's equal employment and AAP.

      • Indicate any need for remedial action.

      • Determine the degree to which the Hospital's placement goals and objectives are being attained.

      • Provide management with a working understanding of the Hospital's AAP placement goals and objectives.

   E. Meeting with managers, supervisors, and employees to ensure that the Hospital's EEO policies are being followed.

   F. Ensuring that supervisors understand that their work performance is being evaluated in part on the basis of their demonstrated commitment to equal employment opportunity, and that it is their responsibility to prevent all types of unlawful workplace harassment.

   G. Serving as a liaison between the Hospital and enforcement agencies.
H. Serving as a liaison between the Hospital and appropriate minority and women's organizations, and community action groups concerned with employment opportunities of minorities and women.

I. Making contact with predominately female and minority high schools, colleges, and technical schools in the area as needed.

J. Keeping management informed of developments in the equal employment opportunity and affirmative action area.

K. Conducting a periodic audit to ensure that the Hospital complies in the following ways:

   1. EEO posters are properly displayed.

   2. All employees are afforded the opportunity and are encouraged to participate in all Hospital-sponsored educational, training, recreation, and social activities.

2. The Hospital recognizes that the cooperation of department supervisors and line managers is required to reach the full potential of this AAP. Therefore, supervisors and managers are expected to:

   A. Assist the Affirmative Action Officer in the identification of any problem areas and help to eliminate any barriers to equal employment opportunity.

   B. Whenever possible, become involved in local minority organizations, women's organizations, community action groups, and community service programs.

   C. Work with the Affirmative Action Officer to periodically review hiring and promotion patterns and training programs to isolate impediments to the attainment of affirmative action placement goals and objectives. Results from these reviews are communicated through appropriate management meetings.

   D. Review the qualifications of employees to ensure that minorities and women are given full opportunity for transfers and promotions.

   E. Provide career counseling for employees as needed.

   F. Adhere to the Hospital’s policy of equal employment opportunity for all employees and ensure that the policy is understood, supported and adhered to by the employees they supervise.

   G. Take action to prevent the harassment of employees based on protected characteristics or due to a perception that an individual might have been the beneficiary of the Hospital’s affirmative action efforts.
As one of the diagnostic components of Johns Hopkins Health System Corporation’s AAP and to conform to applicable regulations, the Hospital has completed a profile of the workforce at the Baltimore, MD establishment. The organizational profile is an overview of the staffing patterns at this establishment and is used to determine whether there are areas in the workforce where minorities or women are underrepresented or concentrated. To complete our organizational profile we have elected to follow the workforce analysis methodology.

The following charts set forth our Workforce Analysis. The analysis identifies the departments at the Baltimore, MD establishment and for each department lists all job titles from the lowest paid to the highest paid. For each job title, we provide the following data: the total number of incumbents, the total number of male and female incumbents, and the total number of male and female incumbents by racial/ethnic group.

We have included a chart identifying the employees included in this AAP but who actually work at other Johns Hopkins Health System Corporation locations and those employees who work at locations covered by this AAP but who, in accordance with 41 C.F.R. 60-2.1, are included in another Johns Hopkins Health System Corporation AAP. This chart sets forth the locations where the employees are actually working and/or the AAP in which they are included.
JOB GROUP ANALYSIS
In accordance with 41 C.F.R. 60-2.12

As the second diagnostic component of our AAP we have conducted a job group analysis. The job group analysis is the first step in comparing the representation of minorities and women in the workforce covered by this AAP with the estimate of the available qualified minorities and women who could be employed by Johns Hopkins Health System Corporation in positions covered by this AAP.

In designing our job groups we considered the following elements:

- Similarity of duties and responsibilities;
- Similarity of compensation, and
- Similarity of opportunities for advancement including training, transfers, promotions, mobility and other career enhancements.

Although not a determinative factor in designing job groups, we also attempted to create job groups that are large enough to conduct appropriate analysis.

The following charts identify the job groups created for this AAP, the job titles that comprise each job group, and the percentage of minority incumbents and the percentage of female incumbents in each job group.

We have included a chart identifying the employees included in this AAP but who actually work at other Johns Hopkins Health System Corporation locations and those employees who work at locations covered by this AAP but who, in accordance with 41 C.F.R. 60-2.1, are included in another Johns Hopkins Health System Corporation AAP. This chart sets forth the locations where the employees are actually working and/or the AAP in which they are included.
AVAILABILITY ANALYSIS
In accordance with 41 C.F.R. 60-2.14

The availability analysis is a part of the Incumbency vs. Estimated Availability Analysis - the final diagnostic component of this AAP. The purpose of the availability analysis is to establish a benchmark against which the demographic composition of Hospital’s workforce may be compared to determine whether barriers to equal employment opportunity may exist within particular job groups.

Pursuant to applicable regulations, the availability analysis for each job group examines two potential areas of availability: individuals with the requisite skills outside the establishment (external availability) and those within the establishment who are promotable, transferable and/or trainable (internal availability). In determining availability, we have selected our reasonable recruitment area and our pool of promotable, transferable, and trainable employees in such a way as not to exclude qualified minorities and women. Moreover, when determining external availability we have used as our source of data the most current and discrete statistical information available. For this availability analysis, we have used the 2000 census data. Finally, where a job group is composed of different job titles that carry different availability rates, we calculated a composite availability figure. We arrived at the composite availability figure by determining the proportion of the job group incumbents employed in each job title, weighting the availability for each job title by the proportion of incumbents employed in that title, and adding together the weighted availability estimates.

A brief written rationale for the selection of the recruitment areas and internal pools by job group follows:

1A - EXECUTIVE
Factor 1: United States- This is the geographical area from which the Hospital usually seeks or reasonably would seek workers to fill positions in job group 1A - EXECUTIVE. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.
Factor 2: Feeder Job Computations- This pool of feeder positions for job group 1A - EXECUTIVE was chosen based on reasonable paths of progression within the Hospital and includes all promotable, transferable, and trainable employees. This pool reflects current practices and was defined in such a way as not to have the effect of excluding minorities or women.

1B - SENIOR DIRECTOR/ DIRECTORS
Factor 1: United States- This is the geographical area from which the Hospital usually seeks or reasonably would seek workers to fill positions in job group 1B - SENIOR DIRECTOR/ DIRECTORS. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.
Factor 2: Feeder Job Computations- This pool of feeder positions for job group 1B - SENIOR DIRECTOR/ DIRECTORS was chosen based on reasonable paths of progression within the Hospital and includes all promotable, transferable, and trainable employees. This pool reflects current practices and was defined in such a way as not to have the effect of excluding minorities or women.

1C - MANAGERS
Factor 1: Washington-Baltimore, DC-MD Counties 100%- This is the geographical area from which the Hospital usually seeks or reasonably would seek workers to fill positions in job group 1C - MANAGERS. This area was chosen based on current practices and was drawn in such a way as not to have the effect of
excluding minorities or women.
Factor 2:  **Feeder Job Computations**- This pool of feeder positions for job group 1C - MANAGERS was chosen based on reasonable paths of progression within the Hospital and includes all promotable, transferable, and trainable employees. This pool reflects current practices and was defined in such a way as not to have the effect of excluding minorities or women.

**1D - SUPERVISORS**
Factor 1:  **Baltimore Metro Area and Surrounding Counties 100%**- This is the geographical area from which the Hospital usually seeks or reasonably would seek workers to fill positions in job group 1D - SUPERVISORS. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.
Factor 2:  **Feeder Job Computations**- This pool of feeder positions for job group 1D - SUPERVISORS was chosen based on reasonable paths of progression within the Hospital and includes all promotable, transferable, and trainable employees. This pool reflects current practices and was defined in such a way as not to have the effect of excluding minorities or women.

**2A - PHYSICIANS**
Factor 1:  **United States**- This is the geographical area from which the Hospital usually seeks or reasonably would seek workers to fill positions in job group 2A - PHYSICIANS. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.
Factor 2:  **Feeder Job Computations**- There are no feeder positions for job group 2A - PHYSICIANS.

**2B - NURSE**
Factor 1:  **Maryland**- This is the geographical area from which the Hospital usually seeks or reasonably would seek workers to fill positions in job group 2B - NURSE. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.
Factor 2:  **Feeder Job Computations**- There are no feeder positions for job group 2B - NURSE.

**2E - IT/ ENGINEERS**
Factor 1:  **Baltimore Metro Area and Surrounding Counties 100%**- This is the geographical area from which the Hospital usually seeks or reasonably would seek workers to fill positions in job group 2E - IT/ ENGINEERS. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.
Factor 2:  **Feeder Job Computations**- This pool of feeder positions for job group 2E - IT/ ENGINEERS was chosen based on reasonable paths of progression within the Hospital and includes all promotable, transferable, and trainable employees. This pool reflects current practices and was defined in such a way as not to have the effect of excluding minorities or women.

**2F - OTHER PROFESSIONALS**
Factor 1:  **Baltimore Metro Area and Surrounding Counties 100%**- This is the geographical area from which the Hospital usually seeks or reasonably would seek workers to fill positions in job group 2F - OTHER PROFESSIONALS. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.
Factor 2:  **Feeder Job Computations**- There are no feeder positions for job group 2F - OTHER PROFESSIONALS.

**2H - MEDICAL SUPPORT PROFESSIONALS**
Factor 1:  *Baltimore Metro Area and Surrounding Counties 100%*- This is the geographical area from which the Hospital usually seeks or reasonably would seek workers to fill positions in job group 2H - MEDICAL SUPPORT PROFESSIONALS. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.

Factor 2:  *Feeder Job Computations*- There are no feeder positions for job group 2H - MEDICAL SUPPORT PROFESSIONALS.

**3A - MEDICAL TECHNICIANS**

Factor 1:  *Baltimore Metro Area and Surrounding Counties 100%*- This is the geographical area from which the Hospital usually seeks or reasonably would seek workers to fill positions in job group 3A - MEDICAL TECHNICIANS. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.

Factor 2:  *Feeder Job Computations*- There are no feeder positions for job group 3A - MEDICAL TECHNICIANS.

**5A - SUPERVISORS/LEADS**

Factor 1:  *Baltimore Metro Area and Surrounding Counties 100%*- This is the geographical area from which the Hospital usually seeks or reasonably would seek workers to fill positions in job group 5A - SUPERVISORS/LEADS. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.

Factor 2:  *Feeder Job Computations*- There are no feeder positions for job group 5A - SUPERVISORS/LEADS.

**5C - CUSTOMER SERVICE**

Factor 1:  *Baltimore Metro Area and Surrounding Counties 100%*- This is the geographical area from which the Hospital usually seeks or reasonably would seek workers to fill positions in job group 5C - CUSTOMER SERVICE. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.

Factor 2:  *Feeder Job Computations*- There are no feeder positions for job group 5C - CUSTOMER SERVICE.

**5D - GENERAL OFFICE**

Factor 1:  *Baltimore Metro Area and Surrounding Counties 100%*- This is the geographical area from which the Hospital usually seeks or reasonably would seek workers to fill positions in job group 5D - GENERAL OFFICE. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.

Factor 2:  *Feeder Job Computations*- There are no feeder positions for job group 5D - GENERAL OFFICE.

**7A - OPERATIVES**

Factor 1:  *Baltimore Metro Area and Surrounding Counties 100%*- This is the geographical area from which the Hospital usually seeks or reasonably would seek workers to fill positions in job group 7A - OPERATIVES. This area was chosen based on current practices and was drawn in such a way as not to have the effect of excluding minorities or women.

Factor 2:  *Feeder Job Computations*- There are no feeder positions for job group 7A - OPERATIVES.
COMPARISON OF INCUMBENCY AND AVAILABILITY
In accordance with 41 C.F.R. 60-2.15

Johns Hopkins Health System Corporation has compared the representation of minorities and women in each job group with their representation among those identified in the availability analysis as available for employment in the job group. Where actual representation was less than the calculated availability, the Hospital conducted a statistical test to determine whether the difference was greater than could reasonably be expected. Where the job group was of a sufficient size to analyze using the two standard deviation test, the Hospital applied that methodology. Where the use of the two standard deviation test was not appropriate, the Hospital used the exact binomial methodology. The comparison of availability with actual representation follows:
As required by applicable regulations, Johns Hopkins Health System Corporation has established placement goals where the actual representation of women or minorities in a job group is less than would be reasonably expected based on calculated availability.

In establishing placement goals, we applied the following principles:

1. When the percentage of minorities or women employed in a particular job group is less than would reasonably be expected given their availability percentage in that job group, the Hospital established a percentage annual placement goal at least equal to the availability figure derived for women or minorities, as appropriate, for that job group.

2. Placement goals are not quotas that must be met, nor are they to be considered as either a ceiling or a floor for the employment of particular groups.

3. In all employment decisions, the Hospital makes selections in a nondiscriminatory manner. Placement goals do not provide a justification to extend a preference to any individual, select an individual, or adversely affect an individual's employment status, on the basis of that individual's race, color, religion, sex, age, disability, veteran status, or national origin.

4. Placement goals do not create set-asides for specific groups, nor are they intended to achieve proportional representation or equal results.

5. Placement goals are not used to supersede merit selection principles, nor do these placement goals require the Hospital to hire a person who lacks qualifications to perform the job successfully or hire a less-qualified person in preference to a more-qualified one.

6. The placement goals established in this AAP may reflect the Hospital's publicly announced permissible preference for American Indians living on or near an Indian reservation.

As is described in more detail in the Action Oriented Program section of this AAP, where a placement goal is set, the Hospital will develop action oriented steps to increase the recruitment and training of minorities or women, or both.
IDENTIFICATION OF PROBLEM AREAS BY ORGANIZATIONAL UNIT AND JOB GROUP
In accordance with 41 C.F.R. 60-2.17(b)

We have conducted in-depth analyses of our total employment process, including the workforce by organizational unit and job group, personnel activity, compensation, and other personnel procedures to determine whether and where impediments to equal employment opportunity exist.

An analysis of each of these processes follows.

1. Composition of the Workforce by Organizational Unit

   Our analysis by organizational unit reveals that minorities and women are not significantly underrepresented or concentrated in any particular organizational unit.

   Minorities are employed at a rate of 41.42% and are represented in 61.7% of the Hospital's 188 departments. Further, minorities are represented in 97.67% of the departments that employ 10 or more people. Women are employed at a rate of 72.01% and are represented in 83.51% of all departments, and 100% of all departments that employ 10 or more people. This analysis suggests that there is no policy or practice excluding minorities or women from any departments, nor is there any racial or sexual discrimination in the selection process.

2. Composition of the Workforce by Job Group

   Pursuant to the Office of Federal Contract Compliance Programs' (OFCCP) regulations, we have conducted an availability analysis by job group, taking into account both external and internal availability, and have compared incumbency to estimated availability to determine placement goals. The descriptions of Factor 1 and Factor 2 by job group are summarized in the Availability Analysis. Our findings are as follows:

   A. Our analysis of incumbency vs. estimated availability indicates that in some cases, incumbency is less than estimated availability, however, our more detailed analysis concludes that there is no significant problem concerning minority utilization.

   B. Our analysis indicates that, for women, incumbency is less than availability by a statistically significant amount in job groups 5A- Supervisor/Leads and 5D- General Office.

   C. The Hospital has established affirmative action placement goals and programs to address underutilization, and will continue to make a good faith effort to reach the placement goals established and implement action-oriented programs, which are detailed elsewhere in this AAP.

3. Analysis of Progress Towards Prior Year Goals

   In establishing placement goals, the following principles apply:

   A. When the percentage of minorities or women employed in a particular job group is less than would reasonably be expected given their availability percentage in that job group, the
Hospital has established an annual percentage placement goal at least equal to the availability figure derived for women or minorities, as appropriate, for that job group.

B. Placement goals are not quotas that must be met, nor are they to be considered as either a ceiling or a floor for the employment of particular groups.

C. In all employment decisions, the Hospital makes selections in a nondiscriminatory manner. Placement goals do not provide a justification to extend a preference to any individual, select an individual, or adversely affect an individual's employment status, on the basis of that individual's race, color, religion, sex, age, disability, veteran status, or national origin.

D. Placement goals do not create set-asides for specific groups, nor are they intended to achieve proportional representation or equal results.

E. Placement goals are not used to supersede merit selection principles, nor do these placement goals require the Hospital to hire a person who lacks qualifications to perform the job successfully or hire a less-qualified person in preference to a more-qualified one.

A review of progress and goal attainment by job group for the period from January 1, 2010 - December 31, 2010 reveals the following minorities and women:
4. Personnel Activity

The Hospital has analyzed additional personnel activities to determine whether and where impediments to equal employment opportunity exist and whether there are significant selection disparities by race/ethnicity or gender. These activities include applicant flow, hires, promotions, terminations, and other personnel actions.

A. Applicant Flow

During the plan year, January 1, 2010 - December 31, 2010, the Hospital posted the majority of all open positions with the State Employment Service. The Human Resources Department accepted applications for open positions, and all persons interested in obtaining employment with the Hospital were advised to apply according to our current policy. Applications and complete records have been kept to ensure goals of equal employment opportunity are being applied to this process.

The Hospital believes that applicant flow is not and will not be a problem area. Our analysis reveals that the percentage of minority applicants compares very favorably with the general availability in the respective categories. Clearly the Hospital’s success in implementing and communicating affirmative action and outreach efforts is demonstrated by these statistics.

The following reports summarize applicant flow by job group. Please note that applicants with an identified gender but no race will be included in the Applicant Detail by Gender and applicants with an identified race but no gender will be included in the Applicant Detail by Race.
B. Hires

The Human Resources Department develops all procedures and all hiring at the Hospital is conducted on the basis of nondiscriminatory criteria. Specifically, the following criteria and procedures have resulted in hiring decisions that are free of discrimination:

1. Job descriptions have been reviewed and revised to ensure that duties are accurately described, that the experience and education requirements are strictly job-related, and that all incumbents meet minimum job requirements. Job titles have and will continue to be written without regard to race, color, religion, sex, age, disability, veteran status, national origin, or any other characteristic protected by applicable law.

2. Application forms have been reviewed to ensure that all requested information is job-related, and that the forms comply with all applicable laws. In addition, all forms state that the Hospital is an Equal Opportunity/Affirmative Action Employer.

3. A Johns Hopkins Health System Corporation representative who is briefed in the law with regard to Equal Employment Opportunity/Affirmative Action conducts interviews.

4. Tests have been reviewed and are administered and conducted in a non-discriminatory manner.

5. All employees are encouraged to refer qualified applicants to the Hospital for employment. In addition, the Hospital has formal recruitment procedures to apprise minority and women's groups, educational institutions, and other referral sources of openings.

6. Placing an applicant in a specific job in a department is the responsibility of management. Hiring decisions are based on the applicant's knowledge, skills, abilities, and any other job-related criteria.

A review of external hires for the prior plan year indicates the presence of equal employment opportunity and a strong commitment to affirmative action. There were 196 new employees hired during the period from January 1, 2010 - December 31, 2010, including 101 minorities at 51.53% and 130 women at 66.33%. The following report summarizes hiring activity by job group:
C. Promotion Practices

A review of promotion data indicates that these practices represent an area of substantial employment opportunity for minority and female employees. Promotion practices are not problem areas for minorities and women in any job group. Our analysis reveals that neither minorities nor women are being treated disparately in promotions because:

1. The Hospital provides every reasonable opportunity for employees to advance. In this regard, training and other developmental opportunities are offered.

2. Employees are encouraged to contact their supervisor and/or the Human Resources Department, at any time, should they desire information relative to another position within the Hospital.

3. Management-initiated promotions are based on performance and other job-related criteria without discrimination on account of race, color, religion, sex, age, disability, veteran status, national origin, or any other characteristic protected by applicable law.

4. Most promotional opportunities are posted, providing all interested employees with an opportunity to apply and call their special skills to the attention of the manager.

5. Our program of career development enables all employees to designate career paths and positions for which they wish to be considered.

All of these factors strongly indicate that promotions represent an area of substantial employment opportunity for minority and female employees. A summary of promotion actions for the year is included on the following page:
D. Compensation Systems

As part of its affirmative action obligations, the Hospital has conducted a compensation analysis to determine whether there are pay disparities on the basis of gender, race, or ethnicity. According to our analysis, we have not identified any significant problem areas. If the Hospital discovers significant salary differences between men and women or non-minorities and minorities, it will determine whether they are the result of legitimate, nondiscriminatory factors such as tenure, time in job, time in grade, performance, education, previous experience, etc. Where appropriate, the Hospital will take all reasonable and immediate steps to make any necessary adjustments.

E. Terminations

The Hospital has evaluated its termination practices to determine whether there are disparities on the basis of gender, race or ethnicity. When terminations or reductions in force are necessary, the Hospital makes its decisions without regard to race, color, religion, sex, age, disability, veteran status, national origin, or any other characteristic protected by applicable law. A report summarizing terminations by job group follows:
5. Technical Phases of Compliance

Our analysis of the technical phases of compliance reveals that the Hospital fully complies with all the technical phases of its affirmative action obligations:

A. Equal Employment Opportunity posters are prominently displayed in each Hospital location.

B. The Hospital notifies all contractors and subcontractors via purchase orders and subcontracts that they may be subject to federal affirmative action obligations.

C. The Hospital requires that all of their qualified contractors and subcontractors develop and maintain a written AAP.

D. The Hospital's employment application has a statement concerning Equal Employment Opportunity.

E. All recruitment agencies and area schools and colleges will continue to be notified of the Hospital's commitment to the goals of affirmative action.

F. All recruitment advertising includes the solicitation "An Equal Opportunity Employer" or its abbreviation.

G. All other required affirmative action notices and policy statements are posted on Hospital bulletin boards and are updated annually.

H. All personnel and employment records made or kept by the Hospital are retained for the required period as mandated by OFCCP regulations.

I. The Hospital files annual EEO-1 and Vets-100A reports with the appropriate agencies, as required.
DEVELOPMENT AND IMPLEMENTATION
OF ACTION ORIENTED PROGRAMS
In accordance with 41 C.F.R. 60-2.17

The Hospital has developed and executed action-oriented programs designed to correct any problem areas that may exist. These programs, which are listed below, demonstrate our good faith efforts to remove identified barriers, expand employment opportunities, and produce measurable results.

1. The Hospital has analyzed and will continue to analyze all positions and prepare written descriptions to accurately reflect position functions. Due to the use of a position description format, they are and will continue to be consistent for the same position from one organizational unit to another.

2. Job descriptions have been and will continue to be reviewed to determine the knowledge, skills, abilities, and other requirements necessary for the adequate performance of every job. Specifications will continue to be consistent for the same job title in all organizational units and will not contain any requirements that would result in discrimination on the basis of race, color, religion, sex, age, disability, veteran status, national origin, or other characteristic protected by law.

3. Job descriptions are available to incumbents and all members of management involved in the recruiting, screening, selection, and promotion process. Job descriptions are also made available to employees, applicants, and recruiting sources as appropriate.

4. The Hospital has carefully evaluated the total selection process and found it to be free from discrimination.
   
   A. We have instructed all supervisory personnel to ensure elimination of discrimination in all personnel actions in which they are involved.
   
   B. The tests administered by the Hospital are job-related and given to all applicants for applicable position.
   
   C. Application forms do not contain questions with potential discriminatory effects.
   
   D. The Hospital does not and will not use any selection techniques that can be improperly used to discriminate against minority groups or women.

5. The Hospital has evaluated its techniques for improving recruitment and increasing the flow of qualified minority or female applicants through the following:

   A. Minority and women, as well as non-minority and male, employees are actively encouraged to refer applicants to our organization.

   B. The Hospital relies on the State Department of Employment as well as job fairs and recruiting programs sponsored by local community colleges and other community organizations.
C. The Hospital provides an orientation program to inform new employees of their equal employment responsibilities, promotional opportunities, Hospital rules, ways to alleviate any problems that might arise, and any other issues related to affirmative action compliance.

D. Local organizations will continue to be contacted for referrals of potential minority and female employees.

E. The Hospital utilizes the Internet to identify targeted recruitment sites for qualified minority and female applicants.

F. Furthermore, we plan to take the following additional steps to ensure adequate representation of all minorities and women:

(a) Where placement goals exist as defined by the OFCCP, we will continue to contact universities and two- and four-year local colleges, vocational technical schools, high schools, local business schools, and state and community organizations which attract qualified minority and female students. We will advise these institutions of our desire to fill job openings in these classifications with minority and female employees. When possible, we will continue to participate in job fair and career day activities and we will consider relevant work experience programs.

G. We will continue to contact our normal sources of recruitment (e.g., State Employment) and advise them that under the AAP we are specifically seeking to employ minorities and/or women for job openings. During the period from January 1, 2010 - December 31, 2010, targeted recruitment activities were conducted.

6. The Hospital has implemented the following programs and procedures to ensure that minority and female employees are given equal opportunities for promotion:

A. On-the-job training is provided to all qualified employees to assist them in developing the necessary knowledge and skills for promotion to higher-level jobs. In addition, a tuition reimbursement benefit is also available to all qualified employees.

B. The Hospital utilizes a formal performance evaluation program for all employees. In addition, management and supervisors are trained on the basic methodology of performance evaluation.

C. Neither minority nor female employees are required to possess higher qualifications than those of the lowest qualified incumbent in the job for which they apply.

D. Seniority practices are not a problem since the Hospital has no formal seniority system. Promotions are based on merit selection principles.

E. We will continue to make opportunities for advancement into more stimulating positions
widely known through our career development process and by encouraging minorities and women to take advantage of these opportunities.

F. Special internal training programs are provided as necessary to ensure the achievement of our placement goals. Programs are offered to eligible employees without regard to race, color, religion, sex, age, disability, veteran status, national origin or any other characteristic protected by applicable law.
The Hospital has developed and implemented an auditing system that periodically measures the effectiveness of its total AAP. The Hospital views the activities that are listed below as critical to the success of the AAP.

1. The Affirmative Action Officer will continue to monitor records of applicant flow, referrals, placements, rejected offers, training, transfers, promotions, terminations, and any layoffs or recalls to ensure that the Hospital's non-discriminatory policy is carried out. Procedures are reviewed and revised as problems are identified.

2. Top management is and will continue to be informed of any problems that arise in their respective areas so that immediate and appropriate steps can be taken to resolve any issues.

3. The Hospital recognizes its responsibility to affirmative action and is committed to fulfilling this responsibility by complying with all government regulations and laws pertaining to equal employment opportunity. As part of this commitment, management will be kept abreast of developments in the affirmative action area. The primary vehicle for communication with management will be periodic affirmative action briefings.

4. The Affirmative Action Officer will generate internal reports on a regular basis to evaluate the degree to which equal employment opportunity and organizational objectives are being obtained.

5. The Hospital will review report results with all levels of management as to the degree to which their affirmative action goals and compliance are being attained, and will design and implement corrective actions, including adjustments in programs, as needed.

6. Progress on the Hospital’s AAP will be discussed at supervisors meetings, and relevant information will be communicated to employees during regular departmental meetings as appropriate.

7. The Affirmative Action Officer will periodically report to the President of the Hospital and other appropriate top management on the effectiveness of the program and will submit recommendations for improvement.
CONCLUSION

The AAP Year, January 1, 2011 - December 31, 2011, shows a continued commitment to equal employment opportunity and affirmative action, and has strong plans to ensure both corporate and employee success.

Through its Affirmative Action Officer, Beverly White-Seals, Esq., the Hospital will continue to communicate its policies, both within the organization and to the community in which we work. The President affords the Affirmative Action Officer full authority to take action to implement the plan and to pursue solutions to problems that might impede the progress of this plan.

At the close of Johns Hopkins Health System Corporation's most recent Plan year, an analysis of the composition of the workforce was undertaken. The workforce was analyzed by job group and by department to determine the employment of minorities and women, and to identify if placement goals are indicated when compared to the appropriate available workforce. This analysis revealed two areas in which the difference between incumbency versus estimated availability was statistically significant, showing that for the overwhelming majority of the workforce, employment levels of women and minorities are representative of our recruiting population. Nonetheless, the Hospital expects to continue its successful outreach efforts and to ensure that all applicants and employees are treated fairly, based on job-related criteria and without regard to race, color, religion, sex, age, disability, veteran status, national origin, or any other characteristic protected by applicable law.

The Hospital is mindful of the fact that continued achievements in the area of equal employment opportunity and affirmative action are important. As a result, we have included additional action-oriented plans and programs for recruiting, communication, and reporting, to ensure that our compliance with affirmative action continues in good stead.

Finally, it should be noted that the Hospital's thorough analysis of its workforce reveals that Johns Hopkins Health System Corporation is in full compliance with sex discrimination guidelines and that there is no evidence of discrimination in any form against female employees. As outlined in this AAP, Johns Hopkins Health System Corporation is ready and willing to make affirmative action both a commitment and a continued reality.
LIST OF EXHIBITS

Exhibit A - Policy of Affirmative Action Letter
Dear Outreach and Placement Professional:

This letter is to inform you that Johns Hopkins Health System Corporation is committed to the principles of equal employment opportunity. Moreover, as a government contractor bound by Executive Order 11246, Johns Hopkins Health System Corporation takes its affirmative action obligations very seriously. Johns Hopkins Health System Corporation states as its Policy of Affirmative Action the following:

A. It will be the policy of Johns Hopkins Health System Corporation to recruit, hire, train, and promote persons in all job titles without regard to race, color, religion, sex, age, disability, veteran status, national origin, or any other characteristic protected by applicable law.

B. All employment decisions shall be consistent with the principle of equal employment opportunity, and only job-related qualifications will be required.

C. All personnel actions, such as compensation, benefits, transfers, tuition assistance, social and recreational programs, etc. will be administered without regard to race, color, religion, sex, age, disability, veteran status, national origin, or any other characteristic protected by applicable law.

To assure compliance with the Hospital's AAP, Beverly White-Seals, Esq., Affirmative Action Officer, has been designated to administer and monitor the Plan and make reports to Senior Management. Members of our Human Resources Department will contact you when positions are available. We request that you refer to us all qualified candidates, including women and individuals of color.