

**AFFIRMATIVE ACTION PROGRAM  
FOR  
INDIVIDUALS WITH DISABILITIES**

**University of Wyoming**

September 1, 2014 through August 31, 2015

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Affirmative Action Officer

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## **Introduction**

The University of Wyoming has prepared this Affirmative Action Plan (AAP) based on Section 503 of the Rehabilitation Act of 1972 (as amended) and its implementing regulations in 41 C.F.R. Part 60-741. Therefore, references to "utilization," and so forth, should not be construed as an admission, in whole or in part, that in fact individuals with disabilities have been or are now presently being underutilized or discriminated against in any way which is in violation of any federal, state or local fair employment practice laws. Further, nothing contained in this AAP or its supporting data should be construed as an admission, in whole or in part, of any violation of such federal, state, or local fair employment practices laws.

In developing and implementing this AAP, the University has been guided by its long established policy of providing equal employment opportunity. Any goals established herein are not intended as quotas that must be met, but rather as targets that are reasonably attainable by means of applying every good-faith effort. The use of goals and timetables is not intended, nor is the effect to discriminate against an individual or group of individuals with respect to any employment opportunity for which they are qualified. Indeed, nothing herein is intended to sanction the discriminatory treatment of any person. Thus, this AAP has been developed in strict reliance upon the Guidelines on Affirmative Action issued by the Equal Employment Opportunity Commission (29 C.F.R. Part 1608).

The materials set forth in this AAP are deemed to constitute trade secrets, 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. §552(a), Section 503 of the Rehabilitation Act of 1972, 42 U.S.C. §2000e *et seq.*, and the Trade Secrets Act, 18 U.S.C. §1905, and 44 U.S.C. §3508, and Wyoming Statute Section 16-4-203(d)(v).

The demographics of the workforce as contained in this plan are based on the voluntary self-identification of employees. References to the University's "workforce" do not encompass the student work-study population as it varies significantly between academic years. The AAP's focus on the faculty and staff employees is considered the most effective way to achieve lasting workforce diversification. The University's AAP is a flexible, ongoing program. As additional experience is gained, current guidelines change, or new laws are introduced, the AAP will be modified to reflect these altered circumstances. The Office of Diversity and Employment Practices will update the AAP on an annual basis to incorporate changes resulting from the previous year's activity.

The University's Affirmative Action Plans are available for review by any employee or applicant for employment upon request to the Office of Diversity and Employment Practices. It is also available to members of the public to the extent allowed by law.

## **Equal Education and Employment Opportunity Statement and Policy**

The University is committed to equal opportunity for all persons in all facets of the University's operations and is an Equal Opportunity/Affirmative Action Employer. The University will provide all applicants for admissions and employment and all University employees with equal opportunity without regard to race, gender, religion, color, national origin, disability, age, protected veteran status, sexual orientation, gender identity, genetic information, creed, ancestry, political belief, or any other applicable protected category or participation in any protected activity. The University ensures non-discriminatory practices in all matters relating to its education programs and activities and extends the same non-discriminatory practices to recruiting, hiring, training, compensation, benefits, promotions, demotions, transfers, and all other terms and conditions of employment.

The University is also committed to complying with all of the rules, regulations, and relevant orders of the Secretary of Labor and the Office of Federal Contract Compliance Programs (OFCCP), issued pursuant to

Executive Order 11246, the Vietnam Era Veterans' Readjustment Assistance Act, and Section 503 of the Rehabilitation Act of 1973 (as amended), and has an audit and reporting system to facilitate compliance.

It is the continuing, active, individual responsibility of each principal Administrative Officer, Dean, Department and Division Head, or Supervisor to assure that the University's Equal Employment Opportunity policy is followed when making decisions relating to recruiting, hiring, training, or promoting qualified persons.

Additionally, the University prohibits retaliating against individuals who make a good faith complaint pursuant to this policy or in any manner assists with the investigation of a complaint. Employees and applicants will not be subjected to harassment, intimidation, threats, coercion, or discrimination because they have engaged in or may engage in any of the following activities: (1) filing a complaint; (2) assisting or participating in an investigation, compliance evaluation, hearing or any other activity related to the administration of provisions of Section 503 of Rehabilitation Act of 1973, as amended (Section 503), any other Federal, State, or local law requiring equal opportunity for disabled persons, the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended (VEVRAA), or any other Federal, State, or local law requiring equal opportunity for covered veterans; (3) opposing any act or practice made unlawful by Section 503 or its implementing regulations or any other Federal, State, or local law requiring equal opportunity for disabled persons or VEVRAA or its implementing regulations or any other Federal, State, or local law requiring equal opportunity for covered veterans; or (4) exercising any other right protected by Section 503, VEVRAA or their implementing regulations in this part.

## **DEFINITIONS**

### **41 C.F.R .60-741.2**

The following definitions apply in this Affirmative Action Plan.

**“Disability or Disabilities”** means, with respect to an individual (i) physical or mental impairment that substantially limits one or more of an individual's major life activities, (ii) a record of such impairment, or (iii) being regarded as having such impairment.

**“Major Life Activities”** activities include, but are not limited to, the operation of a major bodily function, caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, sitting, reaching, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, interacting with others, and working. A major bodily function includes, but is not limited to, functions of the immune system, special sense organs and skin, normal cell growth, digestive, genitourinary, bowel, bladder, neurological, brain, respiratory, circulatory, cardiovascular, endocrine, hemic, lymphatic, musculoskeletal, and reproductive functions. The operation of a major bodily function includes the operation of an individual organ within a body system.

**“Substantially Limiting”** A disability is substantially limiting if it substantially limits the ability of an individual to perform a major life activity as compared to most people in the general population. An impairment need not prevent, or significantly or severely restrict the individual from performing a major life activity to be considered “substantially limiting.” Nonetheless, not every impairment will constitute a disability within the meaning of this section

**“Qualified Individual”** means an individual who satisfies the requisite skill, experience, education, and other job-related requirements of the employment position such individual holds or desires, and who, with or without reasonable accommodation, can perform the essential functions of that position.

**“Reasonable Accommodation”** means modifications or adjustments to a job application process that

enable a qualified applicant with a disability to be considered for the position such applicant desires; or to the work environment, or to the manner or circumstances under which the position held or desired is customarily performed, that enable a qualified individual with a disability to perform the essential functions of that position; or that enable the University's employee with a disability to enjoy equal benefits and privileges of employment as are enjoyed by the contractor's other similarly situated employees without disabilities.

## **Responsibility for Implementation**

### **41 C.F.R. 60-741.44(i)**

The University's AAP has the full support of the President, the Board of Trustees, and the University's senior leadership team. The President of the University has overall responsibility for implementation of the Equal Opportunity Policy and the AAP. The President delegates the administration of the policy and the AAP to the Director of Diversity and Employment Practices through the Office of General Counsel. It is the Director's responsibility to publish and to administer the program.

The Director of Human Resources, the Director of Athletics, and the Vice Presidents for Academic Affairs, Administration, Information Technology, Institutional Advancement, Research and Economic Development, and Student Affairs, assist the Office of Diversity and Employment Practices/Affirmative Action Officer in employment opportunity and affirmative action matters, which relate to faculty and staff employment. Additionally, each administrative office, body, or search committee involved in the recruitment, selection, hiring, promotion, and supervision of academic and administrative positions has a continuing, ongoing responsibility to ensure that equal opportunity and affirmative action are meaningful parts of all employment actions, and to work with the Office of Diversity and Employment Practices, which has administrative guidance over all faculty and administrative staff search committees.

The Affirmative Action Officer has the authority, resources, support of, and access to top management necessary for the effective implementation of the AAP.

### **Executive Responsibility**

The specific duties of the Director of Diversity and Employment Practices when functioning as the Affirmative Action Officer include, but are not limited to, the following:

1. Developing guidelines, AAP methods, and internal and external communication strategies. Affirmative action policies and procedures will continue to be developed to ensure an efficient and collaborative interaction between the Affirmative Action Officer and the supervisors and managers charged with employment responsibility.
2. Using monitoring and reporting systems to measure and report the effectiveness of the AAP, and assisting in identifying problems and in developing strategies to address such concerns.
3. Assisting supervisors and managers in identifying solutions to equal employment problems, including counseling and training.
4. Meeting with managers, supervisors, and employees to assure that the University's EEO statement and policy is implemented appropriately and to provide them with guidance on the University's AAP placement goals and objectives, including developments in the equal employment opportunity and affirmative action area.

5. Working with supervisors to help prevent all types of unlawful workplace discrimination and harassment.
6. Identifying and recommending best practices for recruiting individuals with disabilities.
7. Ensuring that EEO posters are properly displayed and that all employees are afforded the opportunity and are encouraged to participate in all University-sponsored educational, training, recreation, and social activities.

### **Staff and Academic Responsibility**

Each staff manager and academic administrative officer of the University shall assist the Office of Diversity and Employment Practices/Affirmative Action Officer in carrying out and implementing the University's Equal Employment Opportunity/Affirmative Action policies within their areas by assisting with the following:

1. Identifying problem areas within their unit or department and helping to eliminate any barriers to equal employment opportunity.
2. Working with the Affirmative Action Officer to periodically review hiring, promotion, and transfers and in reviewing the qualifications of employees to ensure that individuals with disabilities are given full opportunity in such employment actions.
3. In conjunction with the Human Resources Department, providing career development to employees as needed.
4. Adhering to the University's policy of equal employment opportunity for all employees and ensuring that the policy is understood, supported, and adhered to by the employees they supervise.
5. Taking 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 University's affirmative action efforts.
6. Maintaining documentation relative to affirmative action and efforts to recruit a diverse talent pool, including required Affirmative Action/Equal Employment Opportunity documentation consistent with the Search Process.

### **Request for Self-Identification**

**41 C.F.R. 60-741.42**

The University of Wyoming invites applicants and employees to self-identify their disability status at the following times:

1. During the application process;
2. After an offer of employment, but before the individual begins his or her job duties; and,
3. During the workplace survey which the University conducts at least once during the required five-year interval. In addition, the University also provides periodic reminders between workplace surveys encouraging employees to voluntarily update their disability status as needed.

These opportunities provide the University with data to assess the effectiveness of its affirmative action efforts and whether modifications are needed. All information remains confidential and is maintained separately from an employee's personnel or medical files.

See Exhibit A for the Invitation to Self-Identify.

### **Review of Personnel Processes** **41 C.F.R. 60-741.44(b)**

The University of Wyoming periodically reviews its employment actions to assess whether they ensure thorough and consistent consideration of the job qualifications of employees or job applicants who are individuals with disabilities for jobs filled through vacancy or promotion. The University ensures that its employment processes are consistent with the AAP.

The University's process for hiring includes advertising job openings and accepting applications from any interested persons. The University of Wyoming's employment applications, Employee Handbook, and job advertisements also include a non-discrimination statement to notify applicants of the University's policy on equal employment opportunity. This statement also appears on the website of Diversity and Employment Practices. The University notifies the Wyoming Department of Workforce Services of job openings. In addition, to ensure qualified individuals with disabilities are aware of such openings, the University sends vacancy announcements to selected sources listed in the Outreach, Positive Recruitment, and External Dissemination of Policy section of this affirmative action plan, as applicable.

The University ensures its personnel processes do not limit, segregate, classify, or stereotype applicants or employees in a way that adversely affects employment opportunities or status based on their disability status. The University makes sure that when a known individual with a disability is considered for an employment opportunity, the University relies only on that portion of the individual's record, relevant to the requirements of the job.

The University ensures all applicants and employees who meet job qualifications have equal access to its personnel processes, including those available online. The University provides necessary reasonable accommodation to make sure applicants and employees needing reasonable accommodations receive equal opportunity in the operation of all personnel processes.

The Human Resources Department has developed procedures and conducts all hiring for classified staff positions at the University. The Office of Academic Affairs and the Office of Diversity and Employment Practices have developed similar procedures for faculty and administrative staff searches. All searches are conducted based on non-discriminatory criteria.

### **Review of Physical and Mental Job Requirements** **41 C.F.R. 60-741.44(c)**

The University's review of physical and mental job qualification requirements to ensure qualification requirements do not unfairly screen out qualified disabled veterans or other individuals with disabilities for reasons may occur at any point. It encompasses positions that are advertised, filled through hiring or promotion, when the duties of a position changed, during an audit or when considering requests for reasonable accommodation related to performing the essential job duties. The University of Wyoming will ensure the requirements are related to the specific job for which the individual is being considered and are consistent with a business necessity and the safe performance of the job.

If during any review the University becomes aware of processes that require modification, the University will take immediate corrective action. To date, no qualification requirements have been identified that are likely to have a screening effect. All job qualification requirements have been found to be job-related, consistent with a business necessity, or required for the safe performance of the job.

The University of Wyoming also regularly reviews personnel processes to ensure any medical exams or inquiries are conducted in accordance with the Section 503 regulations. Information regarding the medical condition or history of an individual obtained as a result of any such inquiry or exam is collected and maintained on separate forms, in separate medical files, and treated as a confidential medical record.

## **Reasonable Accommodations**

The University informs all employees and applicants of its desire to discuss reasonable accommodations in various ways such as in the Employee Handbook, the pre- and post-offer Invitation to Self-Identify, and on the website of the Human Resources Department.

The University of Wyoming has made and will continue to make reasonable accommodations, which do not impose undue hardships to business or to the known physical and mental limitations of otherwise qualified employees and job applicants.

The University has designed its online application system for classified staff positions and its internal information and communication technologies to increase the accessibility for users. In addition to offering reasonable accommodations to complete the application process, it also offers alternative methods to apply for jobs when needed. This provides equal opportunity for individuals with disabilities to apply for and to be fully considered for positions for which they meet the minimum qualifications.

Employees with a disability as defined in this AAP who believe that such disability is impacting their ability to perform essential job functions are encouraged to contact Human Resources to request a reasonable accommodation. Human Resources will initiate an interactive process involving the employee and the supervisor to discuss confidentially, whether the accommodation will improve performance, as well as the feasibility of the request and any potential alternatives. During this process, the employee will be asked to provide Human Resources with documentation from a health care provider related to the need for the accommodation. All records related to the request for reasonable accommodations are confidential and maintained separately from other personnel records.

Reasonable accommodations may include, but are not limited to, the following examples:

1. Long-term disability programs provide pay for eligible employees absent due to disability. Short-term disability is also available to employees.
2. A medical leave of absence is available to any employee who provides medical documentation of a disability, where the requested absence constitutes a reasonable accommodation.
3. Adaptive technology such as software, adaptive equipment such as supportive desk chairs, special computer monitors and/or keyboards, are made available when needed to enable an employee to perform an essential job function.
4. Should reasonable accommodations be necessary to facilitate access to work areas by qualified employees or applicants with known disabilities, the University will take reasonable steps to provide such accommodations.
5. If necessary to accommodate a disability, the University will redesign jobs to eliminate

nonessential functions, unless the redesign creates an undue hardship or impacts the safe performance of job duties.

6. The University will arrange suitable and flexible work-hours for employees returning from sick leave, leave of absence, and long-term disability where that arrangement constitutes a reasonable accommodation.
7. The University will accommodate employees with disabilities by allowing a reasonable amount of time-off for visits to health care providers.

The University also makes available the following programs and services:

1. Using an on-line request form, any individual can advise the University's Physical Plant regarding locations that may need attention.
2. The University has developed a policy for the use of service and assistance animals.
3. Special parking and transportation for individuals with disabilities is available at the University.
4. The University has also developed guidance for persons with disabilities to assist with emergency evacuation.
5. The University's Accessibility Committee continued its efforts related to web accessibility beginning with improving such access to key websites. The Committee also began the development of an accessibility policy for technology purchases.
6. Training is made available to managers and supervisors to ensure that they know what to do if an employee or applicant makes a request for a reasonable accommodation so that such requests may be processed swiftly.

For additional information regarding reasonable accommodation policies and procedures, see Exhibit B.

### **Compensation** **41 C.F.R.60-741.21(a)(9)**

In offering employment or promotions, the University of Wyoming does not reduce the amount of compensation offered to individuals with disabilities because of any disability income, pension, or other benefit the employee receives from another source. Similarly, the University does not reduce the amount of compensation offered to an employee or applicant because of the actual or anticipated cost of a reasonable accommodation needed, requested, or anticipated.

The University notes that its compensation plan lags behind the national and regional labor market. If the University discovers significant salary differences impacting persons with disabilities, it will determine whether the differences are the result of legitimate, nondiscriminatory factors such as tenure, time in job, time in grade, performance, education, previous experience, etc. To the extent that the results of this review and analysis suggest that corrective action is warranted, the University will take all reasonable and immediate steps to make any necessary adjustments and is committed to taking such action.

### **Internal Communication Procedure**

The University has developed policies and procedures whereby all employees, including individuals with disabilities can raise issues or claims that may arise during the course of their employment. General communication procedures encourage all employees, including those with disabilities, to discuss such issues or claims. All matters brought to the attention of the Affirmative Action Officer will be confidentially addressed to the extent possible under the law.

### **Harassment** **41 C.F.R.60-741.44(e)**

University of Wyoming has developed and implemented policies and procedures to ensure employees who are individuals with disabilities are not harassed because of their disability status. A copy of the University's Equal Employment Opportunity and Affirmative Action Policy Statement forbidding harassment against individuals based on protected characteristics is included in this AAP and is also referred to in the Employee Handbook.

### **Training** **41 C.F.R.60-741.44(j)**

During this AAP year, the University provided training to 630 administrators, faculty, and staff involved in the recruitment, screening, selection, promotion, and other employment actions to ensure commitments in the University of Wyoming's AAP are implemented.

### **Internal Dissemination of Policy** **41 C.F.R.60-741.44(g)**

The University recognizes that proactive internal support from academic administrative officers and staff manager enhances its outreach efforts and is necessary to ensure maximum effectiveness of its AAP for individuals with disabilities. In addition to making the Equal Employment Opportunity and Affirmative Action Policy Statement available in the Employee Handbook, during the hiring process, and on the website of Diversity and Employment Practice, it also utilizes the following ways to maximize internal implementation.

1. The University communicates to employees its obligation to take affirmative action to employ individuals with disabilities and encourages employee referral of covered applicants.
2. The University provides reminders about self-identification after individuals begin employment and an invitation to all current employees to participate in the survey at least once every five years, which increases attention to the affirmative action policy.
3. Meetings with senior leadership and staff managers will be conducted at least annually to explain the University's affirmative action policy, to make clear the University's support for the policy, and to review their affirmative action responsibilities.
4. When applicable, the University of Wyoming publicizes the policy in publications and publishes articles that include accomplishments of all employees, including individuals with disabilities.
5. The policy is discussed in both new employee orientations and management training programs.
6. The University's photo database includes photos of individuals with visible disabilities.

For additional information regarding the internal dissemination of policy, see Exhibit D

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

### **41 C.F.R. 60-741.44(f)**

University of Wyoming has reviewed its employment practices to determine whether its personnel programs are designed to effectively recruit and advance in employment qualified individuals with disabilities. While the University believes there are no deficiencies in its current employment practices with respect to applicants and employees with disabilities, it engages in outreach, positive recruitment, and external dissemination programs to augment its existing affirmative efforts. For example, the University will send written notification of University policy related to its affirmative action efforts as applicable to subcontractors, including subcontracting vendors and suppliers, requesting appropriate action on their part. In addition, the University engages in or has made plans to implement the following activities:

1. Actively encouraging executives, management officials, supervisors, and other employees to assist in the effort to disseminate University of Wyoming's policy of affirmative action to appropriate individuals outside of the University.
2. The University informs recruitment sources of its affirmative action for individuals with disabilities. Recruitment sources will be requested to actively recruit and refer qualified individuals with disabilities for all positions.
3. In order to attract diverse talent pools, the University utilizes Internet sources to conduct targeted recruitment activities that focus on individuals with disabilities.
4. University of Wyoming makes reasonable accommodations for qualified individuals with disabilities during the application process.
5. University of Wyoming advertisements or solicitations for prospective employees indicate that UW is an equal opportunity employer.
6. The University's Accessibility Committee, established in 2008, includes members from various campus units and meets regularly to review current programs and services for individuals with disabilities and reports to University administration with any recommendations.
7. The University also evaluates the effectiveness of its outreach and recruitment efforts to determine if its affirmative action objectives are being met, and makes appropriate changes.

During the period from September 1, 2014 to August 31, 2015, targeted recruitment activities were conducted as described in Exhibits D and F.

## **Data Collection Analysis** **41 C.F.R. 60-741.44(k)**

The University of Wyoming documents computations or comparisons pertaining to applicants and hires on an annual basis and maintains the documentation for a period of three years. For a copy of our data collection analysis for this AAP, see Exhibit G.

## **Utilization Analysis** **41 C.F.R. 60-741.45**

The University of Wyoming has compared the representation of employees with known disabilities in each job group with the utilization goal of 7 percent identified by OFCCP as applicable to this transitional Affirmative Action Plan. This establishes a benchmark to provide the University with a quantifiable method to measure progress toward achieving equal employment opportunity for individuals with disabilities. Benchmarks do not require the University to create preferences for individuals in any employment actions, nor will they adversely affect an individual's employment status, based on that individual's disability status.

1. Hiring benchmarks are not intended to achieve proportional representation or equal results.
2. Hiring benchmarks are not used to supersede qualifications. All selections are based on the knowledge, skills, and abilities of the individual who is the most qualified to successfully perform the job. There is no requirement to hire a less qualified applicant instead of one who is more qualified.
3. A finding that the hiring benchmark has not been attained does not constitute either a finding or admission of discrimination.

For additional information regarding this utilization analysis, see Exhibit H.

## **Identification of Problem Areas** **41 C.F.R. 60-741.45(e)**

When the Utilization Analysis conducted in accordance with the regulations indicates the representation of individuals with known disabilities is less than the current goal identified by OFCCP, the University will take steps to assess whether and where impediments to equal employment opportunity exist, including the following, as appropriate:

1. Sources which have provided limited qualified candidates will be reviewed, and the Affirmative Action Officer will identify actions which may increase the number of qualified applicants received.
2. The Affirmative Action Officer will review positions or job groups that require specialized skill sets or physical requirements.
3. The Affirmative Action Officer will review the University's personnel processes to ensure the careful, thorough, and systematic consideration of the job qualifications of applicants and employees with known disabilities and that no barriers to equal employment opportunities exist.

Based on this analysis, we have developed and will execute the action-oriented programs described in this AAP.

## **Development and Execution of Action-Oriented Programs**

### **41 C.F.R. 60-741.45(f)**

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

1. The University will continue to analyze all positions and prepare or revise written descriptions to ensure that any physical or mental requirements are pertinent to the essential functions of the position and are based on a business necessity. Specifications will not include any requirements that would result in discrimination against individuals with disabilities.
2. Job descriptions are available to incumbents, academic administrators, and staff managers involved in recruiting, screening, selection, and promotion processes. Job descriptions are also made available to employees, applicants, and recruiting sources as appropriate.
3. The University has carefully evaluated the total selection process and found it to be free from discrimination:
  - a. Supervisory personnel have been instructed to ensure there is no discrimination in personnel actions in which they are involved.
  - b. Application forms do not contain questions with potential discriminatory effects.
  - c. All parts of the selection process are free from stereotyping of individuals with disabilities in a manner that limits their access to jobs for which they are qualified.
  - d. The University does not and will not use any selection techniques that can be improperly used to discriminate against individuals with disabilities.
4. The University has evaluated its techniques for improving recruitment and increasing the flow of qualified applicants with disabilities as follows:
  - a. Individuals with disabilities as well as other employees are actively encouraged to refer applicants to the University.
  - b. The University relies on the Wyoming State Department of Employment, job fairs, and recruiting programs sponsored by local community colleges and other community organizations to assist with the recruitment of individuals with disabilities for classified staff positions.
  - c. The University's Employee Handbook, University policies and regulations, and departmental websites collectively inform new employees of their equal employment responsibilities, promotional opportunities, University rules, options 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 individuals with disabilities as potential applicants.
  - e. The University utilizes the Internet to identify targeted recruitment sites for

qualified minority and female applicants.

The University will continue to advise its normal sources of recruitment that the University is specifically seeking to employ individuals with disabilities for job openings. During the period from September 1, 2014 to August 31, 2015, targeted recruitment activities as indicated in Exhibit D.

The University has identified the following additional goals for the next AAP plan year:

1. Vice Presidents will consider reallocation of funding as needed to support costs associated with recruitment.
2. Encourage individuals with disabilities to apply for internal positions, utilizing Target of Opportunity hiring exceptions when appropriate.
3. Continue to provide inclusion training in conjunction with Human Resources.
4. Encourage departments to schedule "Putting People First" diversity sessions with Diversity and Employment Practices.
5. Provide guidance to supervisors regarding compensation and any pay equity issues as may be needed.
6. Strive to increase hiring for individuals with disabilities in the faculty and in staff positions.
7. Continue the progress in transitioning the faculty and administrative search process into the Applicant Tracking System.

The University has implemented the following programs and procedures to ensure that employees with disabilities are given equal opportunities for promotion.

1. As an institution of higher learning, the University is committed to providing all faculty and staff the opportunity to develop their skills and leadership abilities. Schools and departments regularly provide faculty and staff opportunities to attend professional workshops and seminars to assist them in developing the necessary knowledge and skills for promotion to higher-level jobs. In addition, a tuition waiver benefit is also available to all qualified employees so that they may pursue advanced educational degrees or certificates.
2. The University utilizes a performance evaluation program for all classified staff employees.
3. Individuals with disabilities are not are required to possess higher qualifications than those of the lowest qualified incumbent in the job for which they apply.
4. The University has no formal seniority system, and promotions are based on merit selection principles.
5. The University will continue to create opportunities for advancement by individuals with disabilities and encourage those individuals to take advantage of career development opportunities.

6. We will continue to make opportunities for advancement widely known through our internal posting process that encourages all employees, including employees with disabilities, to apply for any open position for which they are qualified with or without reasonable accommodation.
7. The University provides internal training programs as necessary to ensure the achievement of placement goals or promotions. For example, the University will continue to provide “UW- A Diverse Workforce” (OFCCP based Training) and to make available training for ADA Accommodations.

For more information regarding available training and the development of action-oriented programs, see Exhibits F and I.

### **Monitoring and Reporting Systems** **41 C.F.R.60-741.44(h)**

The University has developed and implemented an auditing system that periodically measures the effectiveness of its AAP. The University views the activities that are listed below as critical to the success of the AAP. The implementation of the Applicant Tracking System will enhance the ability to measure progress in the following ways:

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 University's nondiscrimination policy is carried out. Procedures are reviewed and revised as problems are identified.
2. The University will respond to any concerns from individuals with disabilities related to opportunities to participate in University-related activities.
3. 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.
4. The University 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.
5. 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.
6. The University 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.
7. Progress on the University's AAP will be discussed at supervisor meetings and relevant information will be communicated to employees during regular departmental meetings as appropriate.
8. The University will document activities in compliance with its obligations for a period of 3 years.

9. The Affirmative Action Officer will periodically report to the University's Vice President and General Counsel and other appropriate top management on the effectiveness of the program and will submit recommendations for improvement.

### **Conclusion**

The AAP year September 1, 2014 through August 31, 2015 shows a continued commitment by the University to equal employment opportunity and affirmative action and includes plans to ensure both institutional and employee success.

Through its Affirmative Action Officer, Oneida D. Blagg, the University will continue to communicate its policies, both within the University and to the community. The Vice President and General Counsel authorizes the Affirmative Action Officer to take action to implement the plan and to pursue and offer solutions to problems that might impede the progress of this plan.

Following the close of this AAP year, a benchmark analysis was undertaken to determine the progress in this transitional period. Because of the limited data and recent enactment of the data-keeping requirements, it is premature to identify conclusions of any significance at this time related to individuals with disabilities at the University. The collection of new applicant data will be significantly improved with the expansion of the on-line application process to include administrative hires, followed by academic hires and allow for further analysis. Nonetheless, the University expects to continue its internal dissemination of policy to encourage self-identification in the post-offer stage and to increase opportunities to review communications with individuals with disabilities to reflect its commitment to equal opportunity and affirmative action. It will also continue outreach efforts to ensure that all applicants and employees are treated based on job-related criteria and without regard to disability, veteran status, race, color, religion, sex, age, national origin, or any other characteristic protected by applicable law.

The University is mindful of the fact that continued achievements in the area of equal employment opportunity and affirmative action are important. As a result, the University's senior leadership team continued to allocate resources for diversity recruitment and for the expansion of the on-line application system to include administrative and academic hires. These activities, programs, communication, and reporting ensure that its compliance with affirmative action continues in good stead.

Finally, it should be noted that the University's thorough analysis of its workforce reveals that the University is in compliance with disability anti-discrimination guidelines and that there is no evidence of discrimination in any form against individuals with disabilities. As outlined in this AAP, the University has made affirmative action both a commitment and a continued reality.