

**AFFIRMATIVE ACTION PLAN
FOR PROTECTED VETERANS**

University of Wyoming

Laramie, WY

September 1, 2015 through June 30, 2016

Table of Contents

Introduction

Equal Employment Opportunity and Affirmative Action Statement of Policy

Definitions

Responsibility for Implementation Request for Self-identification

Review of Personnel Policies

Review of Physical and Mental Job Requirements Reasonable Accommodations

Compensation

Internal Communication Procedure

Harassment

Training

Internal Dissemination of Policy

Outreach, Positive Recruitment, and External Dissemination of Policy

Data Collection Analysis

Hiring Benchmarks

Monitoring and Reporting Systems

List of Exhibits

Exhibit A: Invitation to Voluntarily Self-Identify

Exhibit B: Reasonable Accommodation Policies and Procedures

Exhibit C: Internal Dissemination of Policy

Exhibit D: Targeted Recruitment Activities

Exhibit E: Training Conducted

Exhibit F: Outreach, Positive Recruitment, and Networking Contacts

Exhibit G: Data Collection Analysis

Exhibit H: Hiring Analysis

Introduction

The University of Wyoming has prepared this Affirmative Action Plan based the Vietnam Era Veterans' Readjustment Assistance Act (VEVRAA) of 1974, as amended by the Jobs for Veterans Act of 2002 (38 U.S.C. § 4212), and its implementing OFCCP regulations (41 C.F.R. Part 60-300). Therefore, the use of such terms as "underutilization," "problem identification," "corrective action," and so forth, should not be construed as an admission, in whole or in part, that in fact veterans 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 and this plan serves as a working document for reporting on personnel actions and informing the campus and greater community of programs and procedures undertaken by the University to further equal employment opportunity and our commitment to affirmative action. 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 AAP¹ 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.²

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, and 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 Page 4 of 16 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

¹ The University has initiated a national search for a Chief Diversity Officer position. Once completed, the duties and responsibilities of the Office of Diversity and Employment Practices will be transitioned to the Office of Human Resources and the Chief Diversity Officer.

² Please note: The University of Wyoming is in the process of adjusting the Affirmative Action Plan year to more accurately reflect data collection cycles. Therefore, this plan includes a shortened year.

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. 60-300.2**

“Disabled Veteran” means (1) A veteran of the U.S. military, ground, naval, or air service who is entitled to compensation (or who but for the receipt of military retired pay would be entitled to compensation) under laws administered by the Secretary of Veterans Affairs, or (2) A person who was discharged or released from active duty because of a service connected disability.

“Qualified Disabled Veteran” means a disabled veteran as defined above who has the ability to perform the essential functions of the employment position at issue with or without reasonable accommodation.

“Recently Separated Veteran” means any veteran during the three-year period beginning on the date of such veteran's discharge or release from active duty in the U.S. military, ground, naval, or air service.

“Armed Forces Service Medal Veteran” means any veteran who, while serving on active duty in the U.S. military, ground, naval, or air service, participated in a United States military operation for which an Armed Forces service medal was awarded pursuant to Executive Order 12985.

“Active Duty Wartime or Campaign Badge Veteran” means a veteran who served on active duty in the U.S. military, ground, naval, or air service during a war or in a campaign or expedition for which a campaign badge has been authorized, under the laws administered by the Department of Defense.

“Major Life 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.

“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.

“Protected Veterans” means Disabled Veterans, Recently Separated Veterans, Armed Forces Service Medal Veterans, and Active Duty Wartime or Campaign Badge Veterans.

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 Office of Diversity and Employment Practices through the Office of General Counsel. It is that office’s responsibility to publish and to administer the program.

The Office of Diversity and Employment Practices/Affirmative Action Officer seeks the assistance of each University unit/administrative office in employment opportunity and affirmative action matters which relate to faculty and staff employment. 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 personnel transactions, 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 Office 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 yet positive interaction between the Affirmative Action Officer and the supervisors and managers charged with employment responsibility.
2. Assisting in the identification of problem areas and developing strategies to eliminate any problems identified.
3. Assisting supervisors and managers in identifying solutions to equal employment problems, including counseling and training.
4. Designing and implementing monitoring and reporting methods that will measure the effectiveness of the University's equal employment practices and AAP; indicate any need for remedial action; determine the degree to which the University's placement goals and objectives are being attained; and provide management with a working understanding of the University's AAP placement goals and objectives.
5. Meeting with managers, supervisors, and employees to assure that the University's EEO statement and policy is understood and implemented appropriately.
6. Working with supervisors to help prevent all types of unlawful workplace discrimination and harassment.
7. Identifying and recommending best practices for recruiting diverse candidates, including targeting individuals with disabilities.
8. Informing management of developments in the equal employment opportunity and affirmative action area.
9. 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 and helping to eliminate any barriers to equal employment opportunity.
2. Working with the Affirmative Action Officer to periodically review hiring and promotion patterns and training programs.
3. Reviewing the qualifications of employees to ensure that minorities and women are given full opportunity for transfers and promotions.
4. In conjunction with the Human Resources Department, providing career development to employees as needed.
5. 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.
6. 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.

7. Maintaining documentation relative to affirmative action and efforts to recruit a broad applicant pool, including required Affirmative Action/Equal Employment Opportunity documentation consistent with the Search Process.

Request for Self-Identification
41 C.F.R. 60-300.42

The University of Wyoming invites applicants and employees to self-identify their status as a protected veteran 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 veteran status as needed.

These opportunities to self-identify serve to notify individuals of their rights under the Uniformed Services Employment and Reemployment Rights Act and provides 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 protected veterans 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 protected veterans 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 status as a protected veteran. When a known protected veteran is considered for an employment opportunity, the University relies only on the portions of the individual's military record that are relevant to the job requirements.

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, in partnership with the Human Resources Department, 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. 60-300.44(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 and may include occasions when the duties of a position change, an audit is conducted, during the performance evaluation process, or when considering requests for reasonable accommodation related to performing the essential job duties. At these points, the University of Wyoming will evaluate the physical requirements to confirm that they 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 willingness to participate in the interactive process and to discuss reasonable accommodations. This notification can be found in the Employee Handbook, the pre- and post-offer Invitations to Self-Identify, on the website of the Human Resources Department, as well as in all job advertisements.

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, administrative and academic 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 Operations 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 continues its efforts related to web accessibility beginning with improving such access to key websites and offering specific training on web accessibility to departments. The committee has also implemented 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 and consistently.

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 protected veterans can raise issues or claims that may arise during the course of their employment. General communication procedures encourage all employees, including protected veterans, 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 protected veterans are not harassed because of their veteran 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 has continued to provide training to 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. Additionally, the University offers training specific to veterans, ADA Accommodations and disability awareness to any employee, including supervisors. Portions of this training have been conducted during the Supervisor Development Institute offered by Human Resources and as requested. The University also offers training specific to Website Accessibility which is available to any University employee.

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 managers enhances its outreach efforts and is necessary to ensure maximum effectiveness of its AAP for protected veterans. 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 Practices, it also utilizes the following ways to maximize internal implementation.

1. The University communicates to employees its obligation to take affirmative action to hire protected veterans and encourages employee referral of applicants.

2. The University's electronic applicant process includes information about the University's commitment to equal opportunity and affirmative action.
3. The University provides reminders about voluntary self-identification after individuals begin employment and issues 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. These reminders have included an informative and instructional video which outlines the invitation and provides directions for voluntarily self-identifying in the University's Human Resources Information System.
4. When applicable, the University of Wyoming publicizes the policy in publications and publishes articles that include accomplishments of all employees, including protected veterans.
5. The policy is discussed in both new employee orientations and management training programs.
6. The University's photo database includes photos of veterans.

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

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 qualified protected veterans. While the University believes there are no deficiencies in its current employment practices with respect to applicants and employees who are protected veterans, 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 administrators, department heads, faculty members, 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 protected veterans.
3. In order to attract diverse talent pools, the University utilizes Internet sources to conduct targeted recruitment activities that focus on protected veterans. This includes contracting with a third party vendor to broadcast all job openings throughout a diverse network of sites, including some targeted specifically toward protected veterans.
4. University of Wyoming makes reasonable accommodations for qualified veterans 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, including veterans, 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.

Please see Exhibits D and F for targeted recruitment activities and outreach, positive recruitment and external dissemination of policy.

Data Collection Analysis

41 C.F.R. 60-300.44(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.

Hiring Benchmarks

41 C.F.R. 60-300.45

The University of Wyoming has adopted the national percentage of veterans in the workforce of 7.2% as identified by the OFCCP, which is applicable to this AAP. This establishes a hiring benchmark to provide the University with a quantifiable method to measure progress toward achieving equal employment opportunity for protected veterans. Hiring benchmarks do not require the University to create preferences for veterans in any employment actions, nor will they adversely affect an individual's employment status, based on that individual's veteran status. In addition, the following principles apply:

1. Hiring benchmarks are not intended to achieve proportional representation or equal results. Hiring benchmarks are not quotas that must be met, nor are they ceilings that limit or restrict the employment of protected veterans.
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 hiring analysis, see Exhibit H.

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 protected veterans 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 provide an annual affirmative action report, evaluating the degree to which equal employment opportunity and organizational objectives are being obtained.
6. The Affirmative Action Officer or University Officer will make available to administrators, deans, and/or departments hiring analyses indicating how specific areas of campus are hiring protected veterans.
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 Affirmative Action Officer will periodically report to the University's President and other appropriate University Officers on the effectiveness of the program and will submit recommendations for improvement.

Conclusion

The AAP year September 1, 2015 through June 30, 2016 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, the University will continue to communicate its policies, both within the University and to the community. The President 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.

The collection of new applicant data will be significantly improved with the expansion of the on-line application process to include academic hires and allow for further analysis. The University also 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 protected veterans 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 fairly based on job-related criteria and 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 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 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 anti-discrimination guidelines and that there is no evidence of discrimination in any form against veterans. As outlined in this AAP, the University has made affirmative action both a commitment and a continued reality.