

**AFFIRMATIVE ACTION PLAN
FOR MINORITIES & WOMEN**

University of Wyoming

Laramie, WY

September 1, 2015 through June 30, 2016

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Introduction

The University of Wyoming is fully committed to the concept and practice of equal opportunity and affirmative action and to that end has prepared this Affirmative Action Plan (AAP) under the requirements of Executive Order 11246, as amended, and implementing regulations, 41 C.F.R. Part 60-1. Terminology from Executive Order 11246 and its implementing regulations has been utilized as a guide. 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 either minorities or women 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. 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), Title VII of the Civil Rights Act of 1964 (as amended) 42 U.S.C. §2000e et seq., and the Trade Secrets Act, 18 U.S.C. §1905, and 44 U.S.C. §3508, and the Wyoming Public Records Act, Wyoming Statute Section 16-4-203(d)(v).

As further detailed in the Job Group Analysis below, this AAP covers 3039 employees, including 891 (29.32%) minorities and 1514 (49.82%) women. 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. 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 Practices¹ 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.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 Executive Order 11246, the Vietnam Era Veterans' Readjustment Assistance Act, and Section 503 of the Rehabilitation Act of 1973, 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

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.

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.

Responsibility for Implementation **41 C.F.R. 602.17**

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 this 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 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 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 women and minorities.
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.

Organizational Profile 41 C.F.R. 602.11

As one of the diagnostic components of the University's AAP and to conform to applicable regulations, the University has completed a profile of its workforce. The organizational profile is an overview of the staffing patterns at the University and is used to determine whether there are areas in the workforce where minorities or women are underrepresented or concentrated. The

University has elected to follow the Workforce Analysis methodology.

See Exhibit A for the University's Workforce Analysis. The analysis lists each department's job titles from the lowest paid to the highest paid. For each job title, the University provides 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.

Job Group Analysis **41 C.F.R. 602.12**

The University has also 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 the University in positions covered by this AAP.

In designing the University's job groups, the University considered the following elements:

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

Although not a determinative factor in designing job groups, the University has also attempted to create job groups that are large enough to conduct appropriate analyses.

This job group analysis complies with the requirements of applicable Office of Federal Contract Compliance Programs (OFCCP) regulations and should not be construed as any indication that the jobs listed in the same job groups are of comparable worth.

See Exhibit C for a chart identifying the job groups created for this AAP, the job titles that comprise each job group, and the percentage of minority and female incumbents in each job group.

Availability Analysis **41 C.F.R. 602.14**

The Availability Analysis is a part of the Incumbency v. Estimated Availability Analysis and is the final diagnostic component of this AAP. The purpose of the availability analysis is to establish a benchmark of the University's workforce to determine whether barriers to equal employment opportunity may exist within particular job groups.

The following factors are considered when determining availability and subsequently, to analyze utilization:

1. Percentage of minorities in population of labor areas surrounding the University;
2. Percentage of women seeking employment in the labor or recruitment area of the University;

3. Percentage of minorities and women among unemployed in labor area surrounding the University;
4. Percentage of minorities and women work force as compared with total work force in the immediate labor area;
5. The general availability of minorities or females having requisite skills in the immediate labor area;
6. The availability of minorities or females having requisite skills in an area in which the University can reasonably recruit;
7. The availability of promotable and transferable minorities or females within the University;
8. The degree of training which the University is reasonably able to undertake as a means of making all job classes available to minorities and women.

Underutilization is determined by comparing the total women and total minority figures to the model work force figures. Job groups in which minorities and women are represented at less than their availability rate are considered underutilized.

Pursuant to applicable regulations, the availability analysis for each job group examines individuals with the requisite skills external to the institution and those within the institution who are promotable, transferable, and/or trainable. In determining availability, the University has selected its recruitment area and its pool of promotable, transferable, and trainable employees in such a way as not to exclude qualified minorities and women.

In determining external availability, the University used the most current and discrete statistical information available. For this availability analysis, the University used the 2000 census data.

Where a job group is composed of different job titles that carry different availability rates, the University calculated a 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.

The recruiting areas for each of the major University employment categories are listed below:

- 1) Administrator
- 2) Faculty/academic professionals
- 3) Professional non-faculty
- 4) Clerical/secretarial
- 5) Technical/paraprofessional
- 6) Crafts/trades
- 7) Service/maintenance

The University usually seeks or reasonably would seek to fill Administrator, Professional non-faculty and Faculty/Academic Professional positions nationally. For all other job groups, the University usually seeks or reasonably would seek to fill positions regionally in southeast Wyoming and northeast Colorado. These areas were chosen based on current practices and were drawn in such a way as not to have the effect of excluding minorities or women.

There are no feeder positions for these job groups. Employees are encouraged to apply for higher level positions for which they may be qualified.

Geographic areas and sources of statistics used for these comparisons were used in compliance with government regulations. The use of certain geographic areas and sources of statistics does not indicate the University's agreement that the geographic areas are appropriate or that the sources of statistics are the most relevant. The use of such geographic areas and statistics is intended to have no significance outside the context of this AAP. Such statistics and geographic areas will be used, however, in total good faith with respect to this AAP.

All references to "underutilization" are made pursuant to OFCCP regulations and do not constitute an admission that minorities or women are in fact underutilized in any job group or EEO-6 category. Further, any statistical disparities in this analysis occur notwithstanding the University's good-faith efforts to recruit, hire, promote, transfer, and otherwise make all human resource decisions without regard to race, sex, age, color, national origin, religion, disability, or any other non-job-related factor.

Comparison of Incumbency vs Estimated Availability 41 C.F.R. 602.15

The University 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 University conducted a statistical test to determine whether the difference was greater than could reasonably be expected. The University used the following methodologies: (1) The two standard deviation test (if job group was of sufficient size) and (2) the binomial methodology. See Exhibit D for the comparison of availability with actual representation.

Placement Goals 41 C.F.R. 602.16

The University's affirmative action efforts are directed toward achieving a level of general and minority representation in all job groups equivalent to availability. In accordance with applicable regulations, when the actual representation of women or minorities in a job group is less than would be reasonably expected based on calculated availability, the University has established placement goals.

In establishing placement goals, the University 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, the University established a percentage annual placement goal at least equal to the corresponding availability in the relevant recruitment area.

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 University 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, national origin, or any other characteristic protected by applicable law.
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 they require the University 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.

As is described in more detail in the Action-Oriented Program section, when a placement goal is set, the University will develop action-oriented steps to increase the recruitment and training of minorities and/or women.

Identification of Problem Areas by Organizational Unit and Job Group 41 C.F.R. 602.17(b)

The University has conducted in-depth analyses of its employment processes, including an analysis of the workforce by organizational unit and job group, personnel activity, compensation, and other personnel procedures to determine whether impediments to equal employment opportunity exist.

The University's organizational units consist of the following: (1) Office of the President; (2) Division of Academic Affairs; (3) Division of Administration; (4) Division of Information Technology; (5) Division of Institutional Advancement; (6) Division of Research and Economic Development; (7) Division of Student Affairs; (8) Department of Intercollegiate Athletics; (9) the Office of Governmental and Community Affairs; and (10) the Office of General Counsel. The ten organizational units are combined to provide an overall, consolidated University planning unit for analysis, corrective action, and goal planning.

The analysis consists of the following elements:

1. Composition of the workforce by organizational unit:

Of the 279 departments in this AAP, 205 or 73.48% include minorities, and 233 or 83.51% include females. The analysis reveals that minorities and women are not significantly underrepresented or concentrated in any particular organizational unit. The analysis also 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 OFCCP regulations, the University has 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 University's findings are as follows:

A. For women, incumbency is less than availability by a statistically significant amount for faculty and academic professionals.

B. The University has established affirmative action placement goals and programs to address underutilization, and will continue to make a good faith effort to reach these goals and implement action-oriented programs, as detailed below.

3. Analysis of progress towards prior year goals:

A review of progress and goal attainment for September 1, 2015 to June 30, 2016 reveals that placement goals for women were met except in faculty and academic professionals (job group 2) and continued progress has been made towards placement goals for minorities. The University will continue efforts to increase goal attainment in these areas.

4. Personnel activity

The University has analyzed additional personnel activities to determine whether 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 September 1, 2015 to June 30, 2016, the University posted the majority of all open positions with the Wyoming State Employment Service as well as a network of diversity related sites through a third party contract. This list of sites includes DiversityJobs.com, AfricanAmericanHires.com, WeHireWomen.com, VeteranJobs.net, AllHispanicjobs.com, LatinoJobs.org, DisabilityJobs.net and AllLGBTJobs.com. The Human Resources Department accepted applications for open positions, and all persons interested in obtaining employment with the University were advised to apply according to the University's current policy. Applications and complete records have been kept to ensure goals of equal employment opportunity are being applied to this process.

From the available University data, the percentage of minority and female applicants compares very favorably with the general availability in the respective categories.

The University will continue to implement and communicate its affirmative action and outreach efforts.

B. Hires

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 on the basis of non-discriminatory criteria. Specifically, the following criteria and procedures are utilized:

- i. Available job descriptions are 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 and descriptions are written 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 characteristic protected by applicable law.
- ii. Application forms are reviewed to ensure that all requested information is job related, and that the forms comply with all applicable laws. All forms state that the University is an Equal Opportunity/ Affirmative Action Employer.
- iii. Hiring officials and search committees are trained with regard to Equal Opportunity/Affirmative Action prior to conducting interviews. Search committees for faculty and administrative searches have the additional requirement of meeting with Diversity and Employment Practices staff to discuss diversity recruitment and fair and equitable hiring practices.
- iv. All employees are encouraged to refer qualified applicants to the University for employment. In addition, the University has formal recruitment procedures to apprise minority and women's groups, educational institutions, and other referral sources of openings.
- v. Hiring decisions are based on the applicant's knowledge, skills, abilities, and any other job-related criteria.

A review of the statistics for external hires for the prior plan year indicates the presence of equal employment opportunity and a strong commitment by the University to affirmative action. There were 240 new employees hired during the period from September 1, 2015 to June 30, 2016, including 133 minorities at 55.42% and 119 women at 49.58%. See Exhibit F for a report summarizing hiring activity by job group.

Departments may request exceptions to the University hiring guidelines and advertising process for business necessity, target of opportunity, and spousal accommodation. The exception process is meant to be a privilege for departments that have extenuating circumstances. See Exhibit G for the University's exception processes.

C. Promotion practices

A review of promotion data³ indicates that promotion practices represent an area of substantial employment opportunity for minority and female employees. Promotion practices are not problem areas for minorities and women holding faculty positions. The University's analysis reveals that neither minorities nor women are being treated disparately in promotions:

- i. The University provides reasonable opportunities for employees to advance. In this regard, training and other developmental opportunities are offered to all employees regardless of gender or race.
- ii. 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 University.
- ii. 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.
- iii. Most promotional opportunities are posted, providing all interested employees with an opportunity to apply and call their relevant skills to the attention of the supervisor.
- iv. The University's program of career development enables employees to designate career paths and positions for which they wish to be considered.

The data indicates that most, if not all of the promotions at the University are the result of faculty advancing through professorial ranks consistent with UW Regulation 5-803 (Reappointment, Tenure and Promotion Procedures for University Faculty).

Decisions to promote faculty to the rank of associate professor are based on whether or not the individual has met requirements identified in the regulation and are usually made in the sixth year of their appointment. Faculty have the opportunity but are not required to seek promotion to full professor. In contrast, there is no such equivalent promotion structure for administrative and classified staff.

³ Due to the shortened data collection period for this plan, many faculty promotions are not indicated. When transitioning to our new plan year of November 1 through October 31, promotion data will be included in full.

These employees are encouraged to apply for any positions for which they believe they may be qualified and to take advantage of the professional trainings and tuition waiver program that the University offers to all employees. In addition, from time to time, there may be reclassifications and various job upgrades that reflect a change in job duties. Such changes are reviewed by the Human Resources Department and/or the Diversity and Employment Practices Office and may include an increase in pay.

An adverse impact analysis was conducted, and data was analyzed by job group. For females, no adverse impact was present for any job groups. For minorities, no adverse impact was present for any job groups.

All of these factors strongly indicate that promotions represent an area of substantial employment opportunity for minority and female employees at the University. See Exhibit G for a summary of promotion actions for the year.

D. Compensation Systems

As part of its affirmative action obligations, the University is continually developing and evaluating internal systems to determine whether there are pay disparities on the basis of gender, race, or ethnicity in its compensation system. The University notes that its compensation plan lags behind the national and regional labor market and is in the process of researching and drafting a salary policy that will address this issue. If the University discovers significant salary differences between men and women or nonminorities and minorities, 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.

E. Terminations

The University 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 University makes its decisions 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 characteristic protected by applicable law. In case of position elimination or reduction in force, the Office of Diversity and Employment Practices conducts an assessment to determine if the proposed action may result in adverse impact on minorities and women. See Exhibit J for a report summarizing terminations by job group.

F. Technical phases of compliance

The University's analysis of the technical phases of compliance reveals that the

University fully complies with all the technical phases including, but not limited to, the dissemination of its affirmative action obligations and plan as follows:

1. Equal Employment Opportunity posters are prominently displayed on the University campus.
2. The University notifies covered contractors and subcontractors through a contract clause in purchase orders and subcontracts that they may be subject to federal affirmative action obligations.
3. The University's employment application has a statement concerning Equal Employment Opportunity.
4. The University works collaboratively with the Wyoming Department of Workforce Services and other recruitment resources to notify them of the University's commitment to the goals of affirmative action.
5. All recruitment advertising contains a statement notifying potential job applicants that the University is an Equal Opportunity Employer and includes a link to the University's Fairness web page (<http://www.uwyo.edu/diversity/fairness/>), describing applicable laws regarding equal opportunity and nondiscrimination. All other required affirmative action notices and policy statements are posted on University bulletin boards and are updated as needed.
6. All personnel and employment records made or kept by the University are retained for the required period as mandated by OFCCP regulations.
7. The University files annual required reports with the appropriate agencies.

Development and Implementation of Action-Oriented Programs 41 C.F.R. 602.17

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 has analyzed, and will continue to improve the analysis of all positions and to 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, genetic information, or other characteristics 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 University has carefully evaluated its selection process to ensure that there are no discriminatory practices.
 - a. Supervisory personnel have been instructed to ensure there is no discrimination in personnel actions in which they are involved.
 - b. The University rarely administers any employment tests. However, in limited circumstances where a skills-based employment test is appropriately utilized and administered for certain classified staff positions, the Human Resources Department reviews and approves such testing.
 - c. Application forms do not contain questions with potentially discriminatory effects.
 - d. The University does not, and will not, use any selection techniques that can be improperly used to discriminate against minority groups, women or any other protected group.
 - e. Faculty and Administrative search committees routinely meet with Employment Practices personnel to discuss diversity recruitment and fair and equitable search processes.

5. The University 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 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 minorities and women for classified staff positions. The University also contracts with a third party vendor to post vacancies on a network of diversity websites.
 - c. The University's Employee Handbook, University policies and regulations, and departmental websites 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 potential minority and female employees.
 - e. The University utilizes online recruitment resources to identify targeted sources for qualified minority and female applicants, including a third-party contract that distributes job openings throughout a network of diversity related sites (see Exhibit J: Recruitment Resources).
 - f. The University has successfully transitioned the faculty and administrative search process into an online Applicant Tracking System.

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

- b. The University utilizes a performance evaluation program for all classified staff employees.
- c. The University will continue to create opportunities for advancement by encouraging minorities and women to take advantage of career development opportunities.
- d. 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 both in-person and targeted on-line sexual harassment prevention training through the Equal Opportunity Report and Response Office as well as Human Resources Department. A training session entitled "Sexual Misconduct and the Duty to Report" is required of all employees.

The University plans to take the following additional steps to ensure adequate representation of all minorities and women: Where placement goals exist as defined by the OFCCP, the University will continue to contact, as applicable, 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. The University will advise these institutions of its desire to fill job openings in these classifications with minority and female employees. When possible, the University will continue to participate in job fair and career day activities and will consider relevant work experience programs.

The University will continue to advise its normal sources of recruitment that the University is specifically seeking to employ minorities and/or women for job openings. During the period from September 1, 2015 to June 30, 2016, targeted recruitment activities were conducted using the venues referred to in Exhibit K.

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

1. The Affirmative Action Officer will work with the President, the Provost and Vice President for Academic Affairs, and other University Officers to identify areas for improvement and to implement actions to further affirmative action at the University.
2. The University will continue to improve the analysis and descriptions of all positions to accurately reflect position functions and to review for inclusivity and absence of discriminatory language or requirements.
As directed by the President, the University will develop and implement a Salary Policy which will include annual evaluations for each full-time employee in each employment category. The Salary Policy will also include the development of a clear promotion structure for all classes of employees.
3. Female and Minority employees will be encouraged to apply for internal positions with departments. Departments should also be encouraged to utilize Target of Opportunity hiring exceptions when appropriate. Target of Opportunity exceptions fall under two categories: A qualified scholar or candidate who meets a pre-determined and pre-

approved diversity objective (i.e., minorities, women, individuals with disabilities, LGBTQ and/or veterans) or a distinguished scholar or uniquely outstanding candidate who meets a pre-determined research objective and an institutional need.

4. Guidance will be provided to supervisors regarding merit increases and pay equity issues as they arise.
5. Efforts will be made to increase hiring for women and minorities in non-traditional fields in the faculty and administrative positions. Special attention will be paid to increasing the number of women in faculty and academic professional positions.
6. Strive to increase hiring for women and minorities in non-traditional fields in the faculty and in administrative staff positions.
7. Search committees will continue to be required to meet with a representative of Diversity and Employment Practices to discuss diverse recruitment resources and fair and equitable hiring practices. The Deans and upper administration will enforce this requirement as appropriate.
8. Training opportunities will continue to be explored and developed in the areas of Diversity, Inclusion and Equal Employment Opportunity.
9. Efforts will be increased to encourage all employees to voluntarily self-identify their ethnic, gender, disability and veteran status. As of June 30, 2016, out of 3037 full-time employees, 573 (18.87%) were “Unknown” in terms of ethnicity, meaning that they have not voluntarily self-identified. This high number of “unknowns” results in inaccurate data collection and analysis.

Internal Audit and Reporting System 41 C.F.R. 602.17

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 nondiscriminatory 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 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.

4. 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.
5. The Affirmative Action Officer or University Officer will make available to administrators, deans, and/or departments utilization analyses indicating how specific areas of campus are utilized for minorities and women.
6. 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. University of Wyoming's 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.

At the close of the University's most recent AAP 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 one area (Faculty) in which the difference between incumbencies versus estimated availability was statistically significant, showing that for the overwhelming majority of the workforce, employment levels of women and minorities are representative of the University's recruiting population. Nonetheless, the University 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, 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 has included additional action-oriented plans and programs for recruiting, communication, and reporting to 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 gender discrimination guidelines and that there is no evidence of discrimination in any form against female employees. As outlined in this AAP, the University has made affirmative action both a commitment and a continued reality.

List of Exhibits

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Exhibit B: Job Group Analysis Summary

Exhibit C: Comparison of availability with actual representation

Exhibit D: Summary of applicant flow by job group

Exhibit E: Summary of hiring activity by job group

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Exhibit G: Summary of promotion actions for the year

Exhibit H: Summary of terminations by job group

Exhibit I: Summary of transfers by job group

Exhibit J: Recruitment Sources