

**OFFICE OF FEDERAL CONTRACT COMPLIANCE  
PROGRAMS (OFCCP)  
AFFIRMATIVE ACTION PROGRAM (AAP)  
FOR SECTION 503 OF THE REHABILITATION ACT**

**Plan Effective Date:** 11/1/2016

**Plan Expiration Date:** 10/31/2017

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Senior Human Resource Consultant

**Approved by:** Michael Middleton  
Interim President

**Establishment's Name:** University of Missouri - System Administration  
1,KCITY - KANSAS CITY

**Establishment's Address:** 1000 W. Nifong, Building 7, Suite 330  
Columbia, MO 65211

**University of Missouri - System Administration**

**AFFIRMATIVE ACTION PROGRAM**

**for**

**INDIVIDUALS WITH DISABILITIES**

## **CONFIDENTIAL TRADE SECRET MATERIALS**

The material set forth in the AAP is 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, U.S.C. 552, Title VII of the Civil Rights Act of 1964 (as amended), 42 U.S.C. 2000e et seq., the Trade Secrets Act, 18 U.S.C. 1905, and 44 U.S.C. 3508, the disclosure of which is prohibited by law and would subject the individual making the disclosure to criminal and/or civil sanctions.

# University of Missouri - System Administration

## AFFIRMATIVE ACTION PROGRAM FOR INDIVIDUALS WITH DISABILITIES

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## **I. Equal Employment Opportunity (EEO) Policy Statement (41 CFR 60-741.44(a))**

The *EEO Policy Statement* on the following page is posted on our company's bulletin board along with our required employment posters and is viewable by both employees and applicants.

The *EEO is the Law* poster is also posted on our company's bulletin board as well as made available electronically through our company website for viewing by online applicants.

**University of Missouri - System Administration**  
**EQUAL EMPLOYMENT OPPORTUNITY POLICY STATEMENT**

It is the policy of University of Missouri - System Administration not to discriminate against any employee or applicant for employment because of his or her race, color, religion, sex, sexual orientation, gender identity, national origin, or because he or she is an individual with a disability or disabled veteran, Armed Forces service medal veteran, recently separated veteran, or active duty wartime or campaign badge veteran, or thereafter referred collectively as "protected veterans." It is also the policy of University of Missouri - System Administration to take affirmative action to employ and to advance in employment, all persons regardless of their status as individuals with disabilities or protected veterans, and to base all employment decisions only on valid job requirements. This policy shall apply to all employment actions, including but not limited to recruitment, hiring, upgrading, promotion, transfer, demotion, layoff, recall, termination, rates of pay or other forms of compensation, and selection for training, including apprenticeship, at all levels of employment. Furthermore, the company will provide qualified applicants and employees who request an accommodation due to a disability with reasonable accommodations, as required by law.

University of Missouri - System Administration prohibits harassment of employees and applicants because they are individuals with disabilities or protected veterans. University of Missouri - System Administration also prohibits retaliation against employees and applicants for filing a complaint, opposing any discriminatory act or practice, assisting or participating in any manner in a review, investigation, or hearing or otherwise seeking to obtain their legal rights under any Federal, State, or local EEO law requiring equal employment opportunity for individuals with disabilities and protected veterans. Prohibited retaliation includes, but is not limited to, harassment, intimidation, threats, coercion or other adverse actions that might dissuade someone from asserting their rights.

As President of University of Missouri - System Administration, I am committed to the principles of affirmative action and equal employment opportunity. In order to ensure dissemination and implementation of equal employment opportunity and affirmative action throughout all levels of the company, I have selected Veronica Schultz as the Senior Human Resource Consultant for University of Missouri - System Administration. One of the Senior Human Resource Consultant's duties will be to establish and maintain an internal audit and reporting system to allow for effective measurement of University of Missouri - System Administration's programs.

In furtherance of University of Missouri - System Administration's policy regarding affirmative action and equal employment opportunity, University of Missouri - System Administration has developed a written Affirmative Action Program (AAP) which sets forth the policies, practices and procedures that University of Missouri - System Administration is committed to in order to ensure that its policy of nondiscrimination and affirmative action for qualified individuals with disabilities and qualified protected veterans is accomplished. This AAP is available for inspection by any employee or applicant for employment upon request between 8:00 am - 5:00 pm at the Human Resources department. Any questions should be directed to me, your supervisor, or Veronica Schultz, Senior Human Resource Consultant.

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Kelley Stuck  
President  
University of Missouri - System Administration

11/1/2016

## **II. Review of Personnel Processes (41 CFR 60-741.44(b))**

University of Missouri - System Administration complies with the requirement to "periodically review" its personnel processes by reviewing these processes annually to determine whether its present procedures assure careful, thorough, and systematic consideration of the qualifications of known individuals with disabilities. As part of this review, University of Missouri - System Administration also ensures that its personnel processes do not stereotype individuals with disabilities in a manner which limits their access to all jobs for which they are qualified. This review covers all procedures related to the filling of job vacancies either by hire or by promotion, as well as to all training opportunities offered or made available to employees.

The following is a set of procedures which may be used to meet the requirements of §60-741.44(b):

1. Applicant records are maintained which indicate whether or not an applicant self-identified as an individual with a disability. This information can be retrieved for review by the Department of Labor and the contractor's personnel officials for use in investigations and internal compliance activities.
2. Records are maintained which indicate employees considered for competitive promotions within the organization. Employees are given the opportunity to voluntarily self-identify disability status.
3. Records are maintained regarding training opportunities granted to employees which include whether or not the employee has self-identified as an individual with a disability.
4. Any time a known applicant or employee with a disability is rejected for employment, promotion, or training, the company prepares a statement outlining the reason.
5. Requests for accommodation due to a disability are maintained along with the nature of the request and whether or not the accommodation was granted. If the accommodation was denied, the company prepares a statement describing the reason for denying the accommodation request. All accommodation records are treated as a confidential medical record in accordance with §60-741(d).



### **III. Review of Physical and Mental Job Qualification Standards (41 CFR 60-741.44(c))**

University of Missouri - System Administration reviews the physical and mental job qualification standards of each job opening before it is publicly or internally posted to ensure that, to the extent that such qualification requirements tend to screen out qualified individuals with disabilities, they are related to the job(s) in question and consistent with business necessity and the safe performance of the job. The physical and mental qualifications are also reviewed as new jobs are established or job requirements are modified.

All job qualification requirements were found to be job related and consistent with business necessity and safety. University of Missouri - System Administration will continue to review physical and mental job qualification requirements whenever a job vacancy will be filled through either hiring or promotion and will conduct a qualifications review whenever job duties change.

If University of Missouri - System Administration at any time should inquire into an applicant's physical or mental condition or should conduct a medical examination, such inquiries or exams will be conducted in accordance with the Section 503 regulations and the information obtained as a result of the inquiry or exam will be kept confidential, except as otherwise provided for in the Section 503 regulations. The results of the examination or inquiry will only be used in accordance with the Section 503 regulations.

#### **IV. Reasonable Accommodation to Physical and Mental Limitations (41 CFR 60-741.44(d))**

University of Missouri - System Administration will continue its longstanding commitment to making reasonable accommodation to the known physical or mental limitations of qualified individuals with disabilities unless doing so would impose an undue hardship on the operation of its business. The company also commits to engaging in an interactive process with the person requesting the accommodation (or the person's representative), as needed, to determine an appropriate accommodation.

If an employee with a known disability has significant difficulty performing his or her job and it is reasonable to conclude that the performance problem may be related to the known disability, the manager or appropriate HR personnel will confidentially notify the employee of the performance problem and inquire whether the problem is related to the employee's disability. If the employee indicates that the performance problems are related to his or her disability, the employee is asked if reasonable accommodation is needed.

In determining the extent of the company's accommodation obligations, the following factors are considered:

1. Business necessity; and
2. Financial cost and expense.

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

## **V. Anti-Harassment Procedures (41 CFR 60-741.44(e))**

Employees and applicants of University of Missouri - System Administration will not be subject to harassment because of disability. Retaliation, including intimidation, threat, coercion, or discrimination, against an employee or applicant because they have objected to discrimination, engaged or may engage in filing a complaint, assisted in a review, investigation, or hearing or have otherwise sought to obtain their legal rights under any Federal, State, or local EEO law regarding individuals with disabilities is prohibited. Any employee or applicant who believes that he or she has been subject to retaliation should promptly contact a manager in their chain of command, or promptly contact the EEO Coordinator for assistance.

This policy is made available for employees and applicants to view. Furthermore, University of Missouri - System Administration monitors its environment for the presence of any forms of harassment, intimidation, or coercion and, where warranted, takes corrective action.

## **VI. External Dissemination of Policy, Outreach, and Positive Recruitment (41 CFR 60-741.44(f))**

University of Missouri - System Administration undertakes appropriate outreach and positive recruitment efforts in order to effectively attract individuals with disabilities. In order to comply with the external dissemination of the EEO and Affirmative Action policy, the company provides written or electronic notification to all current subcontractors, vendors, and suppliers and will continue to do so on an annual basis. The company will also provide such notification to new subcontractors, vendors, and suppliers upon entering into a relationship with them. University of Missouri - System Administration has informed its recruiting sources, including State employment agencies and local employment service delivery systems, of the company's policy concerning the employment of qualified individuals with disabilities and will notify them of employment opportunities as they become available. University of Missouri - System Administration requested all recruiting sources to actively recruit and refer qualified persons for job opportunities. University of Missouri - System Administration will include the equal opportunity clause concerning the employment of qualified individuals with disabilities in all non-exempt subcontracts and purchase orders. See Appendix A for detailed information regarding our outreach and positive recruitment activities during the AAP year.

## **VII. Internal Dissemination of Policy (41 CFR 60-741.44(g))**

University of Missouri - System Administration has developed internal procedures to communicate its obligation to engage in affirmative action efforts to employ and advance in employment qualified individuals with disabilities. Procedures are designed to foster understanding, acceptance, and support among all employees and to encourage them to help University of Missouri - System Administration meet this obligation.

The company realizes that an outreach program is ineffective without the adequate internal support from management personnel and other employees. In order to ensure greater employee cooperation and participation in the company's affirmative action efforts, University of Missouri - System Administration has adopted policies and engaged in activities which are not limited to the following:

1. Copy of our AAP for Individuals with Disabilities is available for inspection to any employee or applicant upon request;
2. *EEO Policy Statement* and the *EEO is the Law* poster are placed on bulletin boards located throughout our facilities and work areas;
3. Electronic versions of the *EEO Policy Statement* and the *EEO is the Law* poster are clearly labeled and posted on the company's intranet;
4. Meetings with executive, management, and supervisory personnel are held to explain the intent of the policy and individual responsibility for effective implementation;
5. Managers and supervisors are provided with affirmative action and EEO training upon commencement of their management roles;
6. Policy is discussed during employee orientation;
7. Union officials and/or employee representatives are informed of these policies;
8. When employees are featured in publications, individuals with disabilities are included when available.

## **VIII. Audit and Reporting Systems (41 CFR 60-741.44(h))**

The Senior Human Resource Consultant has the responsibility for the preparation and implementation of the AAP. Responsibility for the effective implementation of the AAP is also vested with each department manager and supervisor.

The following activities are reviewed at least annually to ensure freedom from discrimination against, or stereotyping of, individuals with disabilities in any manner. The results of the most recent self-audit are included in Appendix B. During the self-audit, the following activities are reviewed:

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

University of Missouri - System Administration's audit system includes periodic reports provided by Senior Human Resource Consultant documenting University of Missouri - System Administration's efforts to achieve its EEO/AAP responsibilities. Managers and supervisors are asked to report any current or foreseeable EEO problem areas and are asked to outline their suggestions/recommendations for solutions.

The following documents are maintained as a component of University of Missouri - System Administration's internal audit process: documentation of self-audit; summary data of personnel activity including external job offers and hires, promotions, resignations, terminations, and

layoffs by job group relating to individuals with disabilities; and an applicant flow log showing the name, race, ethnicity, sex, disability status, veteran status, date of application, job title, and action taken for all individuals applying for job opportunities.

## **IX. Responsibility for Implementation (41 CFR 60-741.44(i))**

### **A. Responsibilities of EEO Coordinator:**

Veronica Schultz, the Senior Human Resource Consultant, has been designated to direct the activities of the affirmative action program. This person has the responsibility for ensuring the effective implementation of the company's AAP. These responsibilities include, but are not limited to:

1. Implementing the AAP for individuals with disabilities, policy statements, personnel policies and procedures, internal and external communication of the policy, and monitoring the effectiveness of these actions;
2. Reviewing all personnel actions, policies, and procedures to ensure compliance with University of Missouri - System Administration's affirmative action obligations;
3. Assisting Human Resources department with reviewing the qualifications of all applicants and employees considered/eligible for hiring, promotion, transfer, or layoff/reduction in force to ensure qualified individuals with disabilities are treated in a nondiscriminatory manner when hiring, promotion, transfer, or layoff/reduction in force occur;
4. Assisting in the development of solutions for any identified problem areas;
5. Monitoring the effectiveness of the program on a continuing basis through the development and implementation of an internal audit and reporting system that measures the effectiveness of the program;
6. Keeping management informed of equal opportunity progress and problems within the company through, at a minimum, periodic reports;
7. Providing department managers with a copy of the AAP for individuals with disabilities and reviewing the program with them on an annual basis to ensure knowledge of their responsibilities for implementation of the program;
8. Reviewing the company's AAP for individuals with disabilities with all managers and supervisors at all levels to ensure that the policy is understood and is followed in all personnel activities;
9. Assisting in ensuring that career development of employees who are individuals with disabilities is equal to that of other employees;



10. Auditing the contents of company bulletin boards to ensure that required information is posted and up-to-date;
11. Serving as a liaison between University of Missouri - System Administration and enforcement agencies; and
12. Serving as a liaison between University of Missouri - System Administration and outreach and recruitment sources for individuals with disabilities.

**B. Responsibilities of Managers and Supervisors:**

Managers and supervisors are advised annually of their responsibilities under the company's AAP for individuals with disabilities. These responsibilities include, but are not limited to:

1. Reviewing the company's affirmative action policy for individuals with disabilities with subordinate managers and supervisors to ensure that they are aware of the policy and understand their obligation to comply with it in all personnel actions;
2. Reviewing the qualifications of all applicants and employees to ensure individuals with disabilities are treated in a nondiscriminatory manner when hiring, promotion, transfer, or layoff/reduction in force occur; and
3. Reviewing all employees' performance to ensure that non-discrimination is adhered to in all personnel activities.

## **X. Training (41 CFR 60-741.44(j))**

All personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes receive annual training regarding University of Missouri - System Administration's AAP and their role in its implementation. Employees hired or promoted into these roles also receive training on regulatory requirements under Section 503 of the Rehabilitation Act soon after being hired or placed into these roles.

During the annual training, personnel are advised of their responsibilities under the AAP for individuals with disabilities and of their obligations to:

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

## **APPENDIX A – Outreach and Positive Recruitment**

## **Outreach and Positive Recruitment**

The University has reviewed its employment practices to determine whether personnel programs provide the required affirmative action for employment and advancement of qualified individuals with disabilities and qualified Protected Veterans. While the University believes that there are no deficiencies in its current employment practices with respect to these employees, it has planned the following outreach and positive recruitment programs to augment its existing affirmative action efforts:

1. The University will continue to inform recruiting sources of the University's policy of affirmative action for individuals with disabilities and Protected Veterans. Recruiting sources will be requested to actively recruit and refer qualified individuals with disabilities and qualified Protected Veterans for all positions.
2. The University will continue to enlist the assistance and support of local recruiting sources, social service agencies, and organizations especially knowledgeable about the availability of individuals with disabilities and Protected Veterans. These sources will be informed of the University's AAP and will be requested to refer qualified individuals with disabilities and qualified Protected Veterans for employment consideration, including those not currently in the workforce who have requisite skills.
3. The University will continue to notify local organizations, community agencies, secondary schools, and colleges known to specialize in assisting individuals with disabilities and Protected Veterans about the University's policy of affirmative action and request their advice, assistance, and referrals of potential employees, including those who are not currently in the work-force but who have requisite skills.
4. The University will continue to include disabled individuals and/or Protected Veterans when employees are pictured in consumer and personnel recruitment advertising.
5. The University will continue to make reasonable accommodations for qualified individuals with disabilities and qualified disabled veterans.
6. The University continues to take positive steps to attract qualified individuals with disabilities and Protected Veterans not currently in the work-force who have requisite skills and can be recruited through affirmative action measures.
7. The University will review the employment records of its known employees with disabilities or Protected Veterans to determine the availability of promotable, qualified individuals with disabilities, and to determine whether present and potential skills are being fully utilized or developed.
8. When the University advertises for prospective employees, the advertisement will continue to include the EEO solicitation "Equal Opportunity Employer M/F/D/V" or a relevant abbreviation.



Days Posted	Cost	Job Board	Executive/MSP Technical Professionals	MSP Admin. Professionals	Science Research	Administrative Para Professional	Student Affairs	Information Technology	Technicians	Clerical	Library Assistants	Crafts	Food Services	Custodial/Grounds/ Laborers	Protective Service Workers
30 Days	Free	6figurejobs.com	X												X
30 days	\$80	911thjobs.com													
60 days	\$99	AdminCareers.com		X											
30 days	\$125	allmyhealthcarejobs.com				X									
14 days	\$175	Autojobs.com													
Visit website for info.		Career.Edu													
30 days	\$325	CareerBuilder	X	X	X	X	X	X	X	X	X	X	X	X	X
30 days	\$155	Chronicle of Higher Education	X	X	X	X	X	X	X	X	X	X	X	X	X
30 days	\$125	counselingjobsinhigherEd.com		X											
30 days	\$385	Dice.com					X								
60 days	Free	DiscoverPoling.com										X			X
30 days	\$99	execsearches.com		X											
45 days	\$99	execunet.com		X											
60 days	\$0	foodindustryjobs.com													
30 days	\$195	foodservice.com													
30 days	469	healthcareers.com													
60 days	\$195	higherEdJobs.com	X	X	X	X	X	X	X	X	X	X	X	X	X
		Institute of Certified Professional Managers													
60 days	\$225			X		X									
30 days	\$125	ITJobsHigherEd.com			X				X						
30 days	\$99	JKLJobs.com		X											
30 days	\$100	JobsInAcademicAffairs.com	X						X	X	X	X	X	X	X
30 days	\$100	JobsInAdmissions.com				X			X	X	X	X	X	X	X
30 days	\$125	JobsInStudentAffairs.com	X												
30 days	\$495	JobsInTheMoney				X									
30 days	\$279	JustTechJobs.com					X								
30 days	\$0	lawenforcementjobs.com													X
30 days	\$199	MBAcareers.com	X	X					X	X	X	X	X	X	X
30 days	\$210	Monster	X	X					X	X	X	X	X	X	X
30 days	\$100	MultiUnionJobs.com		X											
30 days	\$195	sciencejobs.org													
30 days	\$475	sciencejobs.org													
30 days	\$50	tech-centric.net					X								
15 days	\$99	TechniciansNow.com										X			
30 days	Free	theadladers.com	X												
30 days	\$200	theadladers.com		X				X							

Days Posted	Cost	Job Board	Executive/MSP Technical Professionals	MSP Admin. Professionals	Science Research	Administrative Para Professional	Student Affairs	Information Technology	Technicians	Clerical	Library Assistants	Crafts	Food Services	Custodial/Grounds/ Laborers	Protective Service Workers
30 Days	Free	6figurejobs.com	X									X			
30 days	\$80	911hotjobs.com													X
60 days	\$99	<a href="http://AdminCareers.com">AdminCareers.com</a>		X					X						
30 days	\$125	<a href="http://allmyhealthcarejobs.com">allmyhealthcarejobs.com</a>			X	X		X							
14 days	\$175	<a href="http://Autojobs.com">Autojobs.com</a>									X				
Visit website for info.		Career.Edu		X											
30 days	\$325	CareerBuilder	X	X	X	X	X	X	X	X	X	X	X	X	X
30 days	\$155	Chronicle of Higher Education	X	X	X	X	X	X	X						
30 days	\$125	<a href="http://counselingjobsinhighered.com">counselingjobsinhighered.com</a>		X		X									
30 days	\$385	Dice.com					X								
60 days	Free	<a href="http://DiscoverPolicing.com">DiscoverPolicing.com</a>									X				X
30 days	\$99	execsearches.com	X												
45 days	\$0	execunet.com	X												
60 days	\$99	foodindustryjobs.com													
30 days	\$195	foodservice.com											X		
30 days	469	hcareers.com											X		
60 days	\$195	higheredjobs.com	X	X	X	X	X	X	X	X	X	X	X	X	X
		<a href="http://Institute of Certified Professional Managers">Institute of Certified Professional Managers</a>													
60 days	\$225			X	X										
30 days	\$125	<a href="http://ITJobsHigherEd.com">ITJobsHigherEd.com</a>		X			X	X							
30 days	\$99	<a href="http://JKLjobs.com">JKLjobs.com</a>		X					X	X	X	X	X	X	
30 days	\$100	<a href="http://JobsinAcademicAffairs.com">JobsinAcademicAffairs.com</a>	X			X				X	X				
30 days	\$100	<a href="http://JobsInAdmissions.com">JobsInAdmissions.com</a>			X	X			X						
30 days	\$125	<a href="http://JobsInstudentAffairs.com">JobsInstudentAffairs.com</a>	X			X									
30 days	\$495	JobsInTheMoney			X										
30 days	\$279	justtechjobs.com					X								
30 days	\$0	lawenforcementjobs.com													X
30 days	\$199	<a href="http://MBACareers.com">MBACareers.com</a>	X	X		X	X	X			X				
30 days	\$210	Monster	X	X	X	X	X	X	X	X	X	X	X	X	X
30 days	\$100	MultiUnionJobs.com		X											
30 days	\$195	sciencejobs.org			X										
30 days	\$475	scjobs.sciencemag.org			X										
30 days	\$50	tech-centric.net					X								
15 days	\$99	<a href="http://TechniciansNow.com">TechniciansNow.com</a>									X				
30 days	Free	theladders.com	X												
30 days	\$200	<a href="http://thewildlifesociety.com">thewildlifesociety.com</a>			X			X							

## **APPENDIX B – Self-Audit**



## Self-Audit

It is the responsibility of the University's Affirmative Action Officer to monitor all employment and personnel practices to ensure compliance with applicable regulations and adherence to the University's Equal Employment/Educational Opportunity Policy, to report specific problems to the appropriate management personnel, and to measure the effectiveness of the University's AAP.

The University's audit and reporting system is designed to:

- Measure the effectiveness of the AAP;
- Identify any need for remedial action;
- Determine the degree to which the University's objectives are being attained;
- Determine whether individuals with known disabilities or Protected Veterans have had the full opportunity to participate in all University sponsored educational, training, recreational and social activities;
- Measure the University's compliance with the AAP's specific obligations.

To ensure that the audit system is effective, all records concerning applicants who are individuals with disabilities or Protected Veterans will be maintained for two years, and all personnel actions involving these employees will be individually maintained as a part of their personnel files. Special reports summarizing affirmative action efforts to assist covered employees, descriptions of any formal complaints, etc. will be provided to members of upper management at least annually. This AAP will be updated annually and will include a summary of the previous year's actions and programs.

The University views the activities that are listed below as critical to the success of the AAP.

1. The Affirmative Action Officer will continue to monitor records of applicant flow, referrals, placements, rejected offers, training, transfers, promotions, terminations, and any layoffs or recalls to ensure that the University's non-discriminatory policy is carried out. Procedures are reviewed and revised as problems are identified. Internal reporting will be required on a scheduled basis as to the degree to which EEO is obtained.
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 generate internal reports on a regular basis to evaluate the degree to which equal employment opportunity and organizational objectives are being obtained.
5. 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.

6. Progress on the University's AAP will be discussed at supervisors meetings, and relevant information will be communicated to employees during regular departmental meetings as appropriate.
7. The Affirmative Action Officer will periodically report to the University's Chief Diversity Officer and other appropriate top management on the effectiveness of the program and will submit recommendations for improvement.