



THE UNIVERSITY
of NORTH CAROLINA
at CHAPEL HILL

EQUAL EMPLOYMENT OPPORTUNITY PLAN

Federal Plan

April 1, 2017 – March 31, 2018

UNC-CHAPEL HILL
Equal Opportunity and Compliance Office
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**Federal Equal Employment Opportunity Plan (“Plan”)
(SHRA & EHRA)**

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I. Chancellor's Letter



THE UNIVERSITY
of NORTH CAROLINA
at CHAPEL HILL

MEMORANDUM

CAROL L. FOLT
Chancellor

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TO: The University Community
FROM: Chancellor Carol L. Folt *CLF*
DATE: April 21, 2017
RE: 2017 Equal Employment Opportunity Plan

In compliance with state and federal laws, the University has prepared this 2017 Equal Employment Opportunity Plan (the "Plan") setting forth our commitment to providing equal employment opportunities. The Plan shows us the composition of our workforce at Carolina and sets forth procedures we will use to help further our commitment to a diverse and inclusive work environment.

While legal requirements inform components of the Plan, our commitment to equal employment opportunities reflects our deeply held belief that we can only provide quality service and education by being a campus that is diverse and representative of the larger community. We strongly value the extraordinary benefits diversity brings to our students, employees, and the people of North Carolina.

Accordingly, I hereby adopt this Plan as Chancellor and declare it effective March 1, 2017.

The University of North Carolina at Chapel Hill is a constituent institution of
The University of North Carolina
Equal Opportunity Employer

II. UNC Chapel Hill EO Policy Statement

EQUAL OPPORTUNITY POLICY STATEMENT

As part of its Equal Employment Opportunity Plan (the "Plan"), The University of North Carolina at Chapel Hill (the "University") reaffirms its commitment to providing an inclusive and welcoming environment for all members of our community and to ensuring that educational and employment decisions are based on each individual's abilities and qualifications. Consistent with this principle and applicable laws¹ it is therefore the University's policy not to discriminate with respect to employment terms and conditions on the basis of an individual's protected status: age, color, disability, gender, gender expression, gender identity, genetic information, national origin, race, religion, sex, sexual orientation, or veteran status. Our policy will ensure that only relevant factors are considered and that equitable and consistent standards of conduct and performance are applied.

In furtherance of this policy, all employment-related decisions must be made in accordance with the principles of equal opportunity. All personnel actions such as compensation, benefits, transfers, layoffs, terminations, sponsored training, education, tuition assistance, and social/recreational programs, are to be administered without regard to an individual's protected status. Moreover, the University prohibits any retaliatory action against any employee or applicant for employment, who files a complaint or charge of employment discrimination, testifies, assists, or participates in any manner at a hearing, proceeding, or investigation of employment discrimination.

The University also prohibits unlawful harassment, and the responsibility for implementing the University's harassment policies falls upon its administrators and supervisors. Additionally, the University is committed to providing reasonable accommodations for individuals with disabilities as required by law.

The University's senior administrators, as well as supervisors and managers who are authorized to make employment-related decisions, are responsible for complying with all equal opportunity programs. In this endeavor, these administrators, supervisors, and managers are assisted by the University's Division of Workforce Strategy, Equity and Engagement, the Equal Opportunity and Compliance Office, the Office of Human Resources, and the Office of the Provost. The EOC Office is responsible for monitoring and evaluating the Plan and for presenting periodic reports to the Chancellor.



Carol L. Folt, Chancellor

05/18/2016
Date

¹ Laws, regulation, and guidelines pertaining to equal employment opportunity compliance include, but are not limited to: Title VII of the Civil Rights Act of 1964, as amended; the Equal Pay Act of 1963; the Age Discrimination in Employment Act of 1968, as amended; Executive Order 11246, as amended; Executive Order 13672; the Rehabilitation Act of 1973; the Americans with Disabilities Act of 1990, as amended; the N.C. Gen Stat. §126-16, as amended.

III. Establishment of Responsibilities for Implementation of the Written Affirmative Action Compliance Plan (41 CFR 60-2.17(a))

A. Equal Opportunity Officer

The Equal Opportunity Officer for the University reports to the Senior Associate Vice Chancellor, and the Vice Chancellor for Workforce Strategy, Equity and Engagement. The duties of the Equal Opportunity Officer include the following:

1. To continuously monitor the administration of the **Plan**;
2. To help devise systems for the implementation of the **Plan** and the achievement of its goals, including forms and procedures for the continuous reporting and monitoring of appointment, promotion, and salary actions;
3. To advise and assist the Vice Chancellor, Workforce Strategy, Equity, and Engagement and senior administrative officers with respect to equal opportunity matters;
4. To receive, and respond to, complaints and concerns from individuals and groups with respect to personnel actions alleged to have been based on discrimination in regard to age, color, disability, gender, gender expression, gender identity, genetic information, national origin, race, religion, sex, sexual orientation or veteran status and to advise and assist such complainants in the handling of such complaints;
5. To develop and facilitate training on state and federal EO laws and regulations, the **Plan**, harassment and discrimination prevention and reasonable accommodations for religion and individuals with disabilities;
6. To identify problems with respect to the implementation of the **Plan**;
7. To keep the members of the University community informed of the progress and problems in the administration of the **Plan**;
8. To evaluate the effectiveness of the **Plan**; including analyzing and maintaining data with Peoplefluent AAPlanner software.
9. To serve as the University's liaison with the U.S. Departments of Labor, the United States Department of Education, the Equal Employment Opportunity Commission and other appropriate federal agencies with respect to equal employment opportunity matters;
10. To be a point of contact for organizations representing women, minorities, veterans, and individuals with disabilities;

11. To coordinate special programs to enhance outreach and retention efforts of minorities, women, veterans and individuals with disabilities;
12. To meet with senior administrative officers and keep them informed of developments in the entire equal opportunity area;
13. To serve as a consultant in all internal University EO related matters; and
14. To advise the Vice Chancellor, Workforce Strategy, Equity, and Engagement concerning any needed revision(s) to the **Plan**.

Among the most important responsibilities of the Equal Opportunity Officer in monitoring the administration of the **Plan** is providing underrepresentation analysis information and consultation, outreach, training and monitoring of the recruitment process for compliance to equal employment opportunity regulations. The timing and nature of affirmative action in the initial hiring of SHRA staff is crucial to the success of the **Plan**. Affirmative action efforts should help to assure that recruiting and advertising efforts, both formal and informal, reach the widest possible number of potentially qualified and interested minority, women, veteran, and individuals with disabilities applicants.

B. Responsibilities of Sr. Administrative Officers for Equal Opportunity

The Equal Opportunity and Compliance Office and leadership within the Division of Workforce Strategy, Equity and Engagement have essential roles in the achievement of equal employment opportunity in the University - roles as policy advisors, critics of performance, channels of information on problems and solutions, and other helpful roles. But the achievement of the goals of equal employment opportunity - the employment of larger numbers of minorities, women, veterans, and individuals with disabilities in those sectors of University employment where they are not now found in numbers commensurate with their availability - will depend on the people with day-to-day responsibility for making employment decisions in the University. This responsibility rests with the group of officers referred to in this **Plan** as the senior administrative officers of the University – the Provost, Vice Chancellor for Workforce Strategy, Equity, and Engagement, Senior Associate Vice Chancellor for Workforce Strategy Equity and Engagement, Associate Vice Chancellor for Human Resources, Deans, Directors and Department Chairs, and all other administrative employees in the University who have responsibilities in appointing, promoting and setting the salaries of University staff employees.

Responsibility for guiding and monitoring the thoroughness and effectiveness of efforts of schools and departments to meet equal employment opportunities objectives rests with the Provost. The Provost is the university's principal academic officer and is responsible for administering the academic operation of the University. The Provost exercises the primary responsibility in the goal-

setting process. The Provost has the responsibility for reviewing all recommended appointments to the faculty and all promotions within the faculty. The Provost is responsible for ensuring that the necessary employment-related reports are completed which pertain to all academic appointments. The Provost has the authority to require the schools and departments to comply with the equal opportunity policies of the University. But most important, the Provost has the responsibility for ensuring that the academic programs of the University are successful and that equitable treatment of applicants and current faculty in the academic area and the goals of equal opportunity are achieved concurrently.

The faculty shares this responsibility with respect to faculty appointments and promotions. The faculty has a vital role in making the decisions pertaining to faculty employment.

The responsibility for oversight of EHRA non-faculty lies with the Division of Workforce Strategy, Equity and Engagement. In this instance, the Vice Chancellor has the primary responsibility for achieving the ends of equal opportunity with respect to EHRA non-faculty as well as the faculty. The other senior administrative officers who report to the Chancellor have similar responsibility with respect to the EHRA non-faculty within their units.

Departments are responsible and accountable together with the Equal Opportunity and Compliance Office, the Office of Human Resources and the University administration for meeting University goals which are designed to eliminate the under-representation of minorities and females in the workforce. They are also responsible for making good faith efforts towards achieving the federal utilization goal of 7%, per job group, for qualified individuals with disabilities, as well as, an overall University benchmark of 6.7% for protected veterans. These efforts will help eliminate the barriers to equal opportunity that cause under-representation for these protected classes, and achieve compliance with University and State employment policies and procedures as Federal guidelines. In the case of staff employees, it is the responsibility of the Office of Human Resources to act in effective support of the equal opportunity goals and programs by carrying out various administrative activities in coordination with the Equal Opportunity and Compliance Office. The Provost and Vice Chancellor for Workforce Strategy, Equity, and Engagement provide the necessary measures and resources to effectively run the University equal employment opportunity plan and program.

C. Equal Opportunity Advisory Committee

Prior to January 2017, the leadership of the Equal Opportunity and Compliance Office served in an extended interim capacity; accordingly, the Equal Opportunity Advisory Committee did not meet during the past **Plan** year. However, with new leadership in place, plans are in place to renew and advance the mission of the Equal Opportunity Advisory Committee. The Committee will

advise and assist the Equal Opportunity and Compliance Office with the effective performance of the duties of the office and provides an independent, informed, and concerned voice with respect to the achievement of the goals of equal opportunity. The views of minorities, women, veterans and individuals with disabilities will be fully represented on the Committee. The Committee will meet to review, advise, and revise equal employment opportunity related policies, programs and practices based on the information gathered from the Committee and other University constituents. They will also serve as a communication link between management, employees and the Equal Opportunity Officer, regarding the Equal Opportunity Program. In addition, they will review workforce representation and evaluation data.

IV. Responsibility for Establishing Procedures for Employment

The University has established procedures for two groups of employees:

- Subject to State Human Resources Act Employees (SHRA Employees)
- Exempt from State Human Resources Act Employees (EHRA Employees)

Among the most important responsibilities of the Equal Opportunity Officer in monitoring the administration of the Plan is providing underrepresentation analysis information and consultation, outreach, training and monitoring of the recruitment process for compliance to equal employment opportunity regulations. The timing and nature of affirmative action in the initial hiring of Faculty and staff is crucial to the success of the Plan. Affirmative action efforts should help to assure that recruiting and advertising efforts, both formal and informal, reach the widest possible number of potentially qualified and interested minority, women, veteran, and individuals with disabilities applicants.

A. Procedures for SHRA Employment

The responsibility for designing the reporting forms, procedures and schedules, and for devising the methods of review of the reports and of the results achieved through equal opportunity programs undertaken, is that of the University Equal Opportunity Officer, Sr. Director of Employment and Staffing, Sr. Director of Classification & Compensation and the senior administrative officers.

Department staff complete and forward a request for each SHRA position recruited which includes information about the vacant position, information on where the position was advertised above and beyond the Office of Human Resources website, what special efforts were made to identify minority, female, individuals with disabilities and veteran candidates, and any other information evidencing a thorough search plan. The affirmative action process is structured so the Office of Human Resources can comment before key decisions are made, so that his or her advice may be considered in a timely fashion prior to any step in a particular selection process that will otherwise exclude from further

consideration a substantial portion of the candidates who are minorities, females, individuals with disabilities or veterans.

B. Procedures for EHRA Employment

The Equal Opportunity Officer requires submission of a Recruitment Plan which must include a description of each vacant faculty or EHRA non faculty position, information on where the position will be advertised, what special efforts will be made to identify minority, female, individuals with disabilities and veteran candidates, and any other information evidencing a thorough search plan.

The affirmative action process is structured so that the EPA Non-Faculty Human Resource department can comment before key decisions are made, so that any proffered advice may be considered in a timely fashion. With regard to tenured or tenure-track faculty positions, equal employment opportunity plans should provide for consultation between the faculty members involved in the selection process (or his or her college, school, or departmental representative) and the Academic Personnel department prior to any step in a particular selection process that will otherwise exclude from further consideration a substantial portion of the candidates who are minorities, females, individuals with disabilities and veteran candidates. Departments are required to submit an Interim Equal Opportunity document at the point at which the hiring department has identified the group of applicants from which those who are to be interviewed on campus will be selected. No candidate may be invited to campus for interview until the Interim document has been approved. If, at this point, a problem is perceived in the search process, a request for a review by the academic officer next in line to whom the head of the appointing department reports, will be made. The last stage of the search process is the submission of the Final Equal Opportunity Document to the EHRA Non-Faculty Human Resources department or Academic Personnel department at the time that the department is ready to recommend a candidate for appointment. Again, should the Equal Opportunity Officer perceive deficiencies in the search process, he or she will request a review by the appropriate academic officer.

The object of these procedures is not to substitute the Equal Opportunity Officer's judgment for the academic judgment of the faculty members in the hiring department, but rather to provide for timely consultation focusing on the following questions:

1. Have recruitment and solicitation efforts provided an adequate representation of minority, female, individuals with disabilities, and veteran candidates in light of what is known about their availability in the specific discipline?
2. Is it clear that any minority, female, individuals with disabilities, and veteran candidates who have been excluded from further consideration are

less qualified than those who remain under consideration or the individual(s) recommended for appointment?

V. Identification of Potential Problem Areas (*41 CFR 60-2.17(b)*)

In making an in-depth analysis of the University of North Carolina at Chapel Hill's total employment process, particular attention has been paid to those categories where minority groups and females may face impediments to equal employment opportunities. A detailed discussion of this subject is set forth in the Availability/Incumbency Analysis section of the **Plan**.

The 2010 U.S. Census occupation data by race and sex was used to identify the percentage of minorities and females in the EHRA Non-Faculty Incumbency v. Estimated Availability Summary reports as of October 31, 2016 compared to Recruitment Area Availability including county (Alamance, Chatham, Durham, Orange and Wake counties), state and national data. The University's recruitment area has experienced an increase in terms of population growth. The civilian labor force for the five counties in 2010 totaled 798,520 persons, and in 2015 it totaled 920,070 persons – a 15.2 percent increase. These factors may reflect a dramatic change in the SHRA and EHRA workforce/availability analysis. The availability data for the recruitment area is adjusted for the number of qualified employees in each race and sex category that are considered promotable, transferable, and trainable within the organization to determine the recruitment area availability. Incumbency v. Estimated Availability Summaries for Faculty positions were calculated using separate availability data from the Survey of Earned Doctorates (SED), Associate of American Medical Colleges (AAMC), and the Association of America Law Schools (AALS).

With the current changes to the total number employees reflected in the Plan, the number of minority EHRA Non-Faculty overall has increased to 24.6% with a total of 545. Asians make up 7.9% of the total EHRA Non-Faculty, African Americans 9.6% and Hispanics 4.1%. American Indians, Native Hawaiian and Other Pacific Islanders, and Two+ Race EHRA Non-Faculty has increased to 3.1%. The total percentage of female EHRA Non-faculty has decreased slightly to 61.7% of total faculty.

The number of minority Faculty overall has decreased to 21.6% with a total of 907. Asians make up 10.1% of the total Faculty, African Americans 5.3% and Hispanics 4.2%. American Indians, Native Hawaiian and Other Pacific Islanders, and Two+ Race Faculty has decreased slightly to 1.9%. The total percentage of female faculty has increased slightly to 47.5% of total faculty. Continued efforts will be made to increase the representation of African Americans, Hispanics, American Indians and Native Hawaiian and Other Pacific Islanders for EHRA Non-Faculty and Faculty.

We are making efforts to increase the number of applicants for identified underrepresented minorities and females through the use of more targeted advertisements and outreach to minority groups.

An analysis of the employment practices and procedures of the University of North Carolina at Chapel Hill has revealed the following:

- A. The composition of the workforce in terms of the overall numbers of minority groups and females continues to reflect the University of North Carolina at Chapel Hill's strong commitment to equal employment opportunity.
- B. The University of North Carolina at Chapel Hill's intention is to examine periodically the workforce composition and to establish appropriate goals in order to improve the representation of minorities and females where impediments may exist.
- C. Goals are established when the population of females or minorities in a job group is significantly less than the estimated availability. It is the University of North Carolina at Chapel Hill's intention to establish appropriate goals in order to improve the representation of females and minorities where disparities exist.
- D. The University of North Carolina at Chapel Hill has examined its total selection process, including position descriptions, job titles, application forms, interview procedures, referral procedures, the final selection process, training, compensation systems and employment activities. The result of this review has been to ensure that such employment practices are being uniformly applied without regard to age, color, disability, gender, gender expression, gender identification, genetic information, national origin, race, religion, sex, sexual orientation, or veteran status. The Equal Opportunity Officer is responsible for reviewing this selection process periodically to assure that any requisite qualifications are job-related and non-discriminatory, and that all selection procedures are gender and race neutral.
- E. The University of North Carolina at Chapel Hill's physical facilities, sponsored recreation and social events and special programs, including educational assistance, are all applied and made available on a non-discriminatory basis. The use of the University of North Carolina at Chapel Hill's facilities will not be permitted on any basis inconsistent with the University Policy Statement on Non-Discrimination. All new employees are advised that all employee benefits, salaries and benefit programs are administered in a totally non-discriminatory fashion. The Equal Opportunity Officer is responsible for periodically reviewing these employment areas to ensure that there is no such discrimination.
- F. Management desires to make the work environment in the University of North Carolina at Chapel Hill supportive of equal employment opportunity and has made efforts to obtain the views of the employees.

VI. The Development and Execution of Action-Oriented Programs (41 CFR 60-2.17(c))

The following action-oriented programs or procedures designed to further the University of North Carolina at Chapel Hill's commitment to equal employment opportunity are continuing:

A. Selection

The University of North Carolina at Chapel Hill continues to evaluate the entire selection process and to make every good faith effort to select persons according to ability and qualifications, while recognizing its commitment to take affirmative action to remove impediments to female, minority, individuals with disabilities, and veteran entrants. Recruitment sources are notified of the University of North Carolina at Chapel Hill's Policy Statement on Non-Discrimination. There is no department or job group in the University of North Carolina at Chapel Hill that is limited or closed to employees of a particular age, color, disability, gender, gender expression, gender identification, genetic information, national origin, race, religion, sex, sexual orientation, or veteran status. Further, to help bring about equal employment opportunity, the University of North Carolina at Chapel Hill analyzes all selection techniques and employment standards periodically and, where they are found to create a potential impediment for females, minorities, individuals with disabilities, or veteran, to revise them unless they are job-related. The OHR Organization & Professional Development Department, in conjunction with Employment & Staffing, provides recruitment and selection training to managers and supervisors on a scheduled basis through such courses as SHRA Hiring: From Posting to Probation, BEST (Blueprint for Engaged Supervision Training) and other programs.

B. Recruitment

The University of North Carolina at Chapel Hill uses the following techniques to increase flow of qualified female, minority, individuals with disabilities and veteran applicants:

1. Recruitment Programs for SHRA Employees

Continuing recruitment activities for staff employees include the following:

- Posting the Staff Permanent Openings List daily on the on-line application system at www.jobs.unc.edu. The list is also posted at the Administrative Office Building, 104 Airport Drive each Wednesday by Employment & Staffing;
- Participating in Job/Career Fairs sponsored by recruiting sources,

- community organizations, veteran organizations, local Department of Social Services, and other area employers;
- Periodically contacting community organizations such as the Division of Employment Security, as well as, organizations for veterans and Individuals with Disabilities (IWD);
 - Providing the www.jobs.unc.edu URL to other agencies, such as the Division of Employment Security, the University of North Carolina-General Administration, and the Office of State Human Resources to establish links between the websites;
 - Providing collateral materials such as recruitment handouts and marketing items to agencies, minority groups, and community organizations;
 - Placing advertisements, as appropriate, in diversity recruiting sources such as the *Diverse Issues in Higher Education* and the *INSIGHT into Diversity*, as well as, cross-posting on Indeed.com partner diversity sites, localjobnetwork.com, insidehighered.com and hercjobs.org;
 - Attending and networking at professional meetings such as Triangle Industry Liaison Group (TILG) meetings and NC Business Leadership Network (NCBLN); and
 - Applicant screening and referral to departments with open staff positions.
2. Recruitment Programs for EHRA Employees
- Recruitment for faculty and EHRA non-faculty positions may, in addition to the above, include:
- Advertising broadly as appropriate in national professional journals and newspapers, regional journals and newspapers and web-based recruiting sources;
 - Letters and announcements to other colleges and universities;
 - Networking and interviewing at professional meetings;
 - Special efforts to identify minority and female candidates through professional caucuses, organizations and schools with significant minority enrollments;
 - Every effort is made to include minorities and females on search committees;

- Regular contact with representatives of veteran's groups, including the Division of Employment Security and Vocational Rehabilitation Services;
- All positions are posted automatically in UNC Employment Opportunities and Inside Higher Ed Jobs.com; and
- All advertisements include the statement: "EOE/AAs/Females/Minorities/Veterans/Individuals with Disabilities".

C. Promotions

The University of North Carolina at Chapel Hill will periodically review its promotion criteria and procedures to ensure that promotional decisions are made without regard to age, color, disability, gender, gender expression, gender identity, genetic information, national origin, race, religion, sex, sexual orientation or veteran status. In an effort to maintain acceptable promotion rates for qualified minorities and females, the University of North Carolina at Chapel Hill utilizes the following procedures:

1. Providing job training, including such assistance as tuition reimbursement.
2. Providing an employee evaluation program.
3. Reviewing work specifications to ensure job-relatedness.
4. Reviewing promotional decisions and requiring such decisions to be justified on a non-discriminatory basis.

D. Training

The OHR Organization & Professional Development Department, in conjunction with Employment & Staffing, provides recruitment and selection training to managers and supervisors on a scheduled basis through such courses as SHRA Hiring: From Posting to Probation, BEST (Blueprint for Engaged Supervision Training) and other programs.

The department's mission is to provide meaningful learning opportunities that encourage development, stimulate productivity, create a healthier workplace environment and enhance the capabilities of the University's committed and diverse workforce. Available programs address a wide variety of management, supervisory, and employee needs.

Courses sponsored by OHR Organization & Professional Development also include a variety of cultural diversity programs, such as Diversity in Hiring, Diversity in the Workplace, and Ethics in the Workplace. All workshops are free to UNC-Chapel Hill staff and faculty, managers and supervisors. Special training

is available upon request from hiring departments and selection committees. All educational and other training programs sponsored by the University are open to qualified employees without regard to age, color, disability, gender, gender expression, gender identity, genetic information, national origin, race, religion, sex, sexual orientation or veteran status. Employees are encouraged to take advantage of these training opportunities by a planned, continuing variety of communications from the Office of Human Resources. In addition, educational leaves may be granted by the University for approved educational programming. Information regarding OHR Organization & Professional Development programs, tuition waiver, and other educational assistance programs is available at <http://hr.unc.edu/organization-and-professional-development/>.

The Equal Employment Opportunity and Diversity Fundamentals (EEODF)

All new supervisors are required to attend Equal Employment Opportunity and Diversity Fundamentals (EEODF) training within the first year of becoming a supervisor. This training is offered by the Office of State Human Resources (OSHR), and coordinated through the campus Equal Opportunity and Compliance Office. This program addresses EEO law compliance and workplace diversity in state government. The program focuses on developing awareness and building skills to use on the job. Information regarding the Equal Employment Opportunity and Diversity Fundamentals, is available at <http://eoc.unc.edu/what-we-do/equitable-employment-opportunities/>. Prior to 2017, EEODF was primarily offered off campus in downtown Raleigh, NC. This offsite training location often presented travel problems for its intended participants. The University has since decided to offer EEODF on main UNC campus. The on campus EEODF will be facilitated by three state-certified adjunct trainers that are members of the Equal Opportunity and Compliance Office.

Other EO Training

In addition, the Equal Opportunity and Compliance Office offers instructor-led courses on Preventing Unlawful Harassment in the Workplace, Americans with Disabilities Act (ADA), Search Committees, Carolina Career Conversations (outreach), and custom training addressing harassment and discrimination issues within the workplace. The Equal Opportunity and Compliance Office also offers required courses including Title IX Awareness and Violence Prevention, for all UNC faculty and staff, and Responsible Employees Training for all employees designated as “Responsible Employees” within the University. The catalog of equal employment opportunity training is part of the University’s harassment prevention strategy. The Equal Opportunity and Compliance Office also provides open “Lunch and Learn” sessions for University employees.

E. Facilities

The University of North Carolina at Chapel Hill continually makes certain that its facilities and university-sponsored social and recreational activities are not segregated, and actively encourages all employees to participate in any such university-sponsored events.

VII. Internal Audit and Reporting Systems (41 CFR 60-2.17(d))

The University of North Carolina at Chapel Hill's audit and reporting system is designed to:

- Measure the effectiveness of the **Plan**;
- Document employment activities;
- Identify problem areas where remedial action is needed; and
- Determine the degree to which the **Plan** goals and objectives have been obtained.

The following employment activities are reviewed to ensure non-discrimination and equal employment opportunity for all individuals:

- Recruitment, advertising and job application procedures;
- Hiring, promotion, upgrading, award of tenure, layoff and recall from layoff;
- Rates of pay and any other forms of compensation including fringe benefits;
- Job assignments, job classifications and job descriptions;
- Sick leave, leaves of absence or any other leave;
- Training, apprenticeships, and attendance at professional meetings and conferences; and
- Any other term, condition or privilege of employment.

Responsibility for monitoring, analyzing and evaluating the University's equal opportunity progress for EHRA employees rests with the EHRA Non-Faculty Human Resources department, for faculty the Academic Personnel departments and for SHRA employees, the Employment & Staffing and Classification & Compensation Department within the Office of Human Resources. The following data is reviewed as part of the internal audit process:

- Applicant flow and application referral data by race, sex, interview status and the action taken for individuals applying for job opportunities;

- Summary data of job offers and hires, promotions, resignations, terminations, and layoffs by job group, race and sex;
- Summary data of applicant flow by identifying, total applicants, total minority applicants, and total female applicants for each position; and
- Records pertaining to the University of North Carolina at Chapel Hill's compensation system.

The audit system includes periodic reports documenting the university's efforts to achieve its equal employment opportunity responsibilities. Annually the Equal Opportunity Officer compiles and analyzes an extensive report covering all aspects of equal employment opportunity progress. Employment activity reports for SHRA and EHRA employees are included in Appendices A and B, respectively.

The matter of procedures employed and records kept in the course of recruitment, appointment, reappointment, and promotion activities of the schools and departments and of the officers and committees that review those actions are subject to continuing review and evaluation by the senior administrative officers of the University and by the Equal Opportunity Officer. The Equal Opportunity Officer will meet with and keep senior administrative officers informed of developments in the entire equal employment opportunity area.

The University will, at appropriate intervals, re-examine the various aspects of its equal employment opportunity efforts. Should any instances of discrimination be discovered in such analyses, or by other available means, the appropriate University officials will take corrective action promptly.

VIII. Organizational Profile - as of October 31, 2016

- A. SHRA - The Organizational Profile of SHRA employees is included as Appendix
- B. EHRA - The Organizational Profile of EHRA employees is included as Appendix

IX. Job Group Analysis - as of October 31, 2016

- A. SHRA -The Job Group Analysis of SHRA employees is included as Appendix E.
- B. EHRA - The Job Group Analysis of EHRA employees is included as Appendix F.

X. Workforce Analysis - as of October 31, 2016

- A. SHRA - The Workforce Analysis for SHRA employees is included in Appendix G.
- B. EHRA - The Workforce Analysis for EHRA employees is included in Appendix H.

XI. Availability/Incumbency Analysis - as of October 31, 2016

- A. SHRA - The Availability/Incumbency Analysis for SHRA employees is included in Appendix I.
- B. EHRA - The Availability/Incumbency Analysis for EHRA employees is included in Appendix J.

XII. Placement Goals

- A. SHRA -Placement goals for the 2017 plan year for SHRA employees are included in Appendix K.
- B. EHRA -Placement goals for the 2017 plan year for EHRA employees are included in Appendix L.

Accomplishment of Prior Year Placement Goals

The University of North Carolina at Chapel Hill developed action-oriented programs designed to accomplish the established goals and objectives, thereby enhancing the employment and advancement opportunities for minorities and females. These efforts resulted in making progress toward attaining goals and objectives and strengthening the equal employment opportunity program overall. The 2017 Plan contains data for all permanent and temporary, part-time and full-time employees. These factors may reflect the inability to compare the prior year's placement goals with this year's data.

XIII. Equal Employment Opportunity Program for Individuals with Disabilities (41 CFR Part 60-741) and Protected Veterans (41 CFR Part 60-300)

A. Equal Opportunity Statement

The University of North Carolina at North Carolina will not discriminate against any employee or applicant for employment because of a physical or mental disability, or because he or she is a protected veteran, in regard to any position for which the employee or applicant for employment is otherwise qualified. The University agrees to take affirmative action to employ, advance in employment and otherwise treat qualified individuals with disabilities and qualified veterans without discrimination, based upon their disability or veteran status in all employment practices. The University will recruit, hire, train and promote persons in all job titles, and ensure that all other employment actions are administered, without regard to disability or veteran status; and ensure that all employment decisions are based only on valid job requirements.

In furtherance of this policy, the University prohibits harassment, intimidation, discrimination and any retaliatory action against any employee or applicant for employment who makes a charge of employment discrimination, testifies, assists

or participates in any manner at a hearing, proceeding or investigation of discrimination in an employment complaint.

1. Affirmative Action for Individuals with Disabilities

In accordance with the Americans with Disabilities Act (ADA) and other federal and State law, and consistent with the University's Policy on Prohibited Discrimination, Harassment and Related Misconduct, it is the policy of the University to provide reasonable accommodations in employment to any qualified individual with a disability unless the accommodation would impose an undue hardship on the operation of the University's business or would change the essential functions of the position. Retaliation against an individual with a disability for utilizing this policy is prohibited.

The term "disability" with respect to an individual means a physical or mental condition that substantially limits one or more major life activities, having a record or history of such a condition, being thought of as having such a condition (perceived to have a disability) or an impairment that occurs in episodes or that is in remission if it substantially limits a major life activity when it is active.

2. Affirmative Action for Protected Veterans

The University Veterans' Preference policy applies to eligible veterans and eligible spouses/dependents in appreciation for their service to their country, and in recognition of the time and advantage lost toward the pursuit of a civilian career, veterans shall be granted preference in University employment. The preference and service calculations defined shall apply to eligible veterans and eligible spouses/dependents in initial employment, subsequent employment, promotions, reassignments, lateral transfers and layoffs.

The University, as a government contractor, is subject to the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended by the Jobs for Veterans Act of 2002, 38 U.S.C. 4212 (VEVRAA), which requires Government contractors to take affirmative action to employ and advance in employment: (1) disabled veterans; (2) recently separated veterans; (3) active duty wartime or campaign badge veterans; and (4) Armed Forces service medal veterans.

These classifications are defined as follows:

A "disabled veteran" is one of the following:

- 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
- a person who was discharged or released from active duty because of a service-connected disability.
 - A "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.
 - An "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.
 - An "Armed Forces service medal veteran" means a 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.

B. Review of Employment Processes

The University has reviewed its employment processes and determined that its present procedures are careful, thorough, and systematic in their consideration of the job qualifications of applicants and employees and ensures that they do not stereotype individuals with disabilities and protected veterans. The University analyzes specific job qualifications every time there is a job vacancy to ensure that the qualification requirements do not tend to screen out individuals with disabilities or qualified veterans. This analysis is completed on an individual basis should an individual with disabilities or qualified veteran be excluded from an open position. All qualification requirements approved by the University are job-related or consistent with business necessity and the safe performance of the job.

The University also ensures that all educational and other training are open to qualified employees without regard to disability or veteran status.

As of March 24, 2014, the University began inviting all applicants to voluntarily self-identify as an individual with a disability and/or a veteran, at the pre-offer stage, and again at the post-offer stage, but before the applicant begins work, via the electronic application system, utilizing the format prescribed by the OFCCP in compliance with 41 CFR 60-300.42(a). On August 30, 2016, University employees were also invited to voluntarily self-identify as an individual with a disability and/or a veteran and will continue to do so in no less than five year intervals.

C. Review of Physical and Mental Qualifications

The University reviews the physical and mental job qualification standards as job qualification requirements are established or revised to ensure that, to the extent qualifications standards tend to screen out qualified individuals with disabilities or qualified protected veterans, they are job related for the position in question and are consistent with business necessity.

The hiring department, with assistance and guidance from the Classification & Compensation Consultants do the following:

- Assess the need for the position to ensure it contributes to meeting the goals, objectives, and mission of the work unit;
- Conduct a job analysis including a review of the duties and responsibilities of the position, and the qualifications required for organizational success; and
- If necessary, revise the position description.

Job analysis is necessary only when there is a change in the duties and responsibilities that impact the qualifications and competencies required. If a current, accurate job analysis already exists for a given job type, there is no need to conduct an analysis for each vacancy. All qualification requirements approved are job-related or consistent with business necessity and the safe performance of the job.

D. Reasonable Accommodation to Physical and Mental Limitations

The University is committed to equal opportunity in all aspects of employment for qualified individuals with a disability. In accordance with the Americans with Disabilities Act (ADA) and State law, and consistent with the University's Policy on Prohibited Harassment and Discrimination, it is the policy of the University to provide reasonable accommodations in employment to qualified individuals with disabilities unless the accommodation would impose an undue hardship on the operation of the University's business or would change the essential functions of the position.

The Equal Opportunity Officer, in consultation with other University offices, is responsible for ensuring that appropriate accommodations are available for employees or applicants for employment who self-identify.

E. Harassment Prevention

The University is committed to providing an inclusive and welcoming environment and to ensuring that educational and employment decisions are based on individuals' abilities and qualifications. Consistent with these principles

and applicable laws, it is therefore the University's policy not to discriminate on the basis of the protected statuses including disability and veteran status.

Employees with complaints alleging discrimination or harassment because of his or her disability and/or veteran status are encouraged to utilize the Policy on Prohibited Discrimination, Harassment and Related Misconduct. The policy prohibits complicity for knowingly assisting in an act that violates the policy and retaliation against an individual because of their good faith participation in the reporting, investigation, or adjudication of violations of this policy. Employees are also encouraged to utilize grievance procedure(s) currently in effect at the University.

Employees or applicants should address their concerns to:

Equal Opportunity and Compliance Office
137 E. Franklin Street, Ste. 404
CB #9160
(919) 966-3576

Or to:

Employment & Management Relations
104 Airport Drive, CB #1045
(919) 843-3444

F. External Dissemination of the Policy, Outreach and Recruitment Efforts

The University undertakes appropriate outreach and positive recruitment activities. The University has notified its subcontractors, vendors and suppliers of its affirmative action efforts and obligations through the uses of purchase orders, contracts, and/or other means of notification.

It is the University's intention to establish appropriate goals in order to improve the representation of individuals with disabilities and veterans where disparities exist. The following are lists of ongoing outreach activities the University participates in to fulfill its commitment to providing equal employment opportunities to individuals with disabilities and veterans.

Event	Date	Sponsored By	Target Audience
Hiring Our Heroes Fort Bragg Transition Summit	11/5/15	OHR - Staffing	Vet, Women
Tar Heel Tribute - UNC Veterans Event	11/11/15	EOC/OHR/ Office of the Dean of Students	Vet

NC National Guard Veterans/Spouse Job Fair	2/11/16	NC National Guard; Goodwill	Vet, Women
UNC-CH Spring Job & Internship Expo	2/25/16	UNC Career Services	Candidates w/Diverse Backgrounds
Boots to Suites Conference & Job Fair	3/30/16	North Carolina State University/ Fayetteville State University	Vet, Women
Center for Employment Training Career Fair	4/5/16	Center for Employment Training	Min, Women
Orange County Department of Social Services Job Fair	4/6/16	Orange County Department of Social Services	Min, Women, Vet, IWD
Camp Lejeune Career Fair	4/20/16	OHR - Staffing	Vet, Women
Hiring Our Heroes Fort Bragg Transition Summit	4/27/16	HiringOurHeroes.org / US Chamber of Commerce	Vet, Women
UNC GA Camp Lejuene Veterans Event	5/16/16	OHR - Staffing	Vet, Women
NC4ME Military Employment Summit	5/18/16	EOC	Vet, Women
NC Division of Vocational Rehabilitation Job & Resource Fair	5/19/16	NCWORKS & NC Division of Vocational Rehabilitation	IWD
PATHSS/Project Achieve Externship Program	6/1/16	EOC	IWD
Military Job Fair	6/23/16	OHR - Staffing	Vet, Women
Recruit Military Raleigh Veteran Job Fair	8/4/16	OHR - Staffing	Vet, Women
Boot Print to Heel Print	8/8/16	UNC	Vet, Women
Carolina Careers Conversations	8/19/16	EOC/NC Works - Vet. Resources	Vet, IWD, Women
UNC-CH Fall Job & Internship Expo	9/15/16	OHR - Staffing	Candidates w/Diverse Backgrounds
VA VR&E	9/15/16	OHR - Staffing	IWD
VA VR&E	9/20/16	OHR - Staffing	IWD
Orange County Department of Social Services	9/21/16	OHR - Staffing	Candidates w/Diverse Backgrounds
Camp Lejeune Career Fair and Hiring Event	10/5/16	OHR - Staffing	Vet, Women
AbilityLinks.org Virtual Career Fair	10/12/16	OHR - Staffing	IWD
Empowering Carolina	10/12/16	EOC	IWD
NC WORKS/ NC Division of Vocational Rehabilitation Job & Resource Fair	10/27/16	OHR - Staffing	IWD
Carolina Careers Conversations	10/28/16	EOC/Vocational Rehab	Vet, IWD, Women

Organization	Contact	Notes
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Boots to Suits	Program Coordinator	Job Fair
UNC Dean of Students	Assistant Dean of Students	Veteran's Program
Division of Workforce Solutions	Employment Consultant	information, training, UNC Vet Program invite
Division of Workforce Solutions - Chapel Hill	Office Manager	information, consulting
Division of Workforce Solutions Durham	Veteran Employment Consultant	information, consulting, UNC Vet Program invite
NC Division of Vocational Rehabilitation Services	Business Relationship Manager, Orange, Lee and Chatham Counties	Expect, Employ and Empower - Disability Awareness Event, & Empowering Carolina - Disability Awareness Event
NC Division of Vocational Rehabilitation Services	Rehabilitation Counselor	Expect, Employ and Empower - Disability Awareness Event, & Empowering Carolina - Disability Awareness Event
NC4ME	Executive Director	NC4Me Summit for Military Employment
NCWorks Career Center	Veterans Employment Program Supervisor	Job Fairs, Tar Heel Tribute
North Carolina Department of Commerce, Division of Workforce Solutions	Veteran Employment Supervisor	Job Fairs
School of Law - Veterans Advocacy Student Organization	SL Juris Doctor	*Campus Veteran Resource Contacts
UNC GA at Fort Bragg - US Army Special Forces Command	Military Academic Advisor	Veteran's Program
UNC GA at Fort Bragg - US Army Special Forces Command	Military Academic Advisor	Job Fairs, Veterans Program
UNC ROTC Program	Army Recruiter	*Campus Veteran Resource Contacts
UNC ROTC Program	Adjunct Professor & Chair	*Campus Veteran Resource Contacts
UNC Veteran's Resource Team	Campus-wide Resource Team members	*Campus Veteran Resource Contacts
University Registrar	GI Bill Services Specialist	*Campus Veteran Resource Contacts
Vets To Vets United, Inc	Founder	Tar Heel Tribute speaker, referrals

Additional Outreach, Support, & Training

Green Zone Training for all Recruiters

UNC Veterans Program

includes: Veteran Website/Portal; Veterans Outreach Marketing Supplies; Career Coaching; Job Search Assistance; and Veteran's Preference Policy

Non-Discrimination (& Outreach) Training - Veterans Status - BEST
Non-Discrimination & Reasonable Accommodation Training (& Outreach) - IWD Status - BEST
OHR ADA/Reasonable Accommodations Presentations
PATHSS (Project Achieve for Transitioning High School Students) Program

In addition, the University also undertakes and considers the following activities in order to promote equal employment opportunities with individuals with disabilities and protected veterans.

Continuing recruitment activities for staff employees include the following:

- Posting the Staff Permanent Openings List daily on the on-line application system at www.jobs.unc.edu. The list is also posted at the Administrative Office Building, 104 Airport Drive each Wednesday by Employment & Staffing;
- Participating in Job/Career Fairs sponsored by recruiting sources, community organizations, veteran organizations, local Department of Social Services, and other area employers;
- Periodically contacting community organizations such as the Division of Employment Security, as well as, organizations for veterans and Individuals with Disabilities (IWD);
- Providing the www.jobs.unc.edu URL to other agencies, such as the Division of Employment Security, the University of North Carolina-General Administration, and the Office of State Human Resources to establish links between the websites;
- Providing collateral materials such as recruitment handouts and marketing items to agencies, minority groups, and community organizations;
- Placing advertisements, as appropriate, in diversity recruiting sources such as the *Diverse Issues in Higher Education* and the *INSIGHT into Diversity*, as well as, cross-posting on Indeed.com partner diversity sites, localjobnetwork.com, insidehighered.com and hercjobs.org;
- Attending and networking at professional meetings such as Triangle Industry Liaison Group (TILG) meetings and NC Business Leadership Network (NCBLN); and
- Applicant screening and referral to departments with open staff positions.

Future Outreach Activities

The University continually reviews the outreach and recruitment efforts throughout the Plan period to evaluate the effectiveness in identifying and recruiting qualified individuals with disabilities and qualified protected veterans. While building meaningful contacts, the University continues to seek out opportunities to participate in formal and informal job fairs and information sessions to attract more applicants.

G. Internal Dissemination of the Policy

The University disseminates this policy internally as follows:

1. All employees are advised annually of the University's policy and encouraged to support it;
2. Inform all employees and prospective employees of its commitment to engage in affirmative action to increase employment opportunities for individuals with disabilities and protected veterans;
3. The policy is included in employee orientation and is discussed thoroughly in the Blueprint for Engaged Supervision in Training (BEST) program;
4. Completion of the NC Office of State Human Resource's *Equal Employment Opportunity and Diversity Fundamentals* (EEODF) training course is also a requirement for all supervisory and management staff;
5. Hosting the Empowering Carolina Disability Awareness event, celebrating the contributions of employees with disabilities;
6. Hosting the Tarheel Tribute event, celebrating faculty, staff and students who served in the military;
7. Applicants and employees who believe they are qualified individuals with a disability, or who are a qualified protected veteran are invited to identify themselves if they wish to benefit under this affirmative action program; and
8. Spotlight articles highlighting the accomplishments of individuals with disabilities and veteran employees within the University.

H. Audit and Reporting System

The University has designed and implemented an audit and reporting system that will:

1. Measure the effectiveness of the university's equal employment opportunity program;

2. Indicate any need for remedial action;
3. Determine the degree to which the university's objectives have been attained;
4. Determine whether employees identified as individuals with a disability and protected veterans have had an opportunity to participate in all university sponsored educational, training, recreational, and social events; and
5. Establish and communicate benchmark and utilization goals when the population of individuals with disabilities in a job group and University-wide protected veterans is significantly less than the established benchmark.
6. Measure the University's compliance with the equal employment opportunity program's specific obligations. Take necessary action to bring the program into compliance where the program is found to be deficient.

I. Responsibility for Implementation

The Equal Opportunity Officer has overall responsibility for implementation of the University's equal opportunity and affirmative action programs. University senior administrators, supervisors and managers share responsibility for implementation of the **Plan**.

J. Training

All employees involved in recruitment, screening, selection, promotion, disciplinary, and related processes shall be trained to ensure that the commitments in the University's **Plan** and programs are implemented.

K. Applicant and Hiring Data Collection Analysis

While current federal regulations have established an employment objective for protected veterans, based on the Vietnam Era Veterans' Readjustment Assistance Act (VEVRAA), which equals a benchmark of 6.7, the Office of State Human Resources has established its own employment objectives of 6% for protected veterans for the 2017 State EEO Plan. In addition, federal regulations also established a utilization goal for qualified individuals with disabilities of 7.0%, for each job group, based on Section 503 of the Rehabilitation Act.

It is the University's intention to establish appropriate goals in order to improve the representation of individuals with disabilities and veterans where disparities exist. It is important to recognize that the University's 2017 Equal Employment Opportunity Plan represents the second year the updated Vietnam Era Veterans' Readjustment Assistance Act, as amended (VEVRAA) at 41 CFR Part 60-300 and

Section 503 of the Rehabilitation Act of 1973, as amended (Section 503) at 41 CFR Part 60-741 regulations were implemented. Although employees and applicants were invited to self-identify as individuals with disabilities and protected veterans, per Plan requirements, as of October 31, 2016, the response continues to be minimal. As a result, the percentage of University employees who have identified as protected veterans and individuals is 1.90% and 1.98% respectively.

Applicant and Hiring Data Collection Analysis:

- 1) Number of applicants who self-identified as:
 - a) Individuals with Disabilities = 4,389
 - b) Protected Veteran = 2707
- 2) Total number of job openings and total number of jobs filled = 4,453
- 3) Total number of applicants for all jobs = 114,604
- 4) Number hired:
 - a) Individuals with disabilities = 119
 - b) protected veteran applicants = 72; and
- 5) Total number of applicants hired = 4,453

After careful evaluation, it was found that the total number of individuals with disabilities and protected veterans who have applied for and were offered positions with the University, is not representative of the total number of applicants who were informed of the open position through outreach resources. This inconsistency has a negative impact on assessing our outreach efforts, and has resulted in an effort to attract and educate applicants on the importance of identifying their recruitment sources and providing a self-identification during the application process.

L. Utilization Analysis for Individuals with Disabilities

Job Group	Job Group Name	Total Employees (Fac, EHRA, SHRA)	Total # IWDs	% IWD
1A	Top Executive Officers	2	0	0.0%
1B	Senior Institutional & Chief Functional Officers	31	0	0.0%
1C	Institutional Administrators	23	0	0.0%
1D	Heads of Academic Divisions, Departments, & Centers	5	0	0.0%
1E	Heads of Administrative Divisions, Departments, & Centers	41	0	0.0%
2A	Faculty / Corps of Instruction	4205	42	1.0%
2B	Professionals with Academic Rank	8	0	0.0%
3A	Administrative Unit Heads / Professionals	82	1	1.2%
3B	Managers	12	2	16.7%
3C	Administrative Professional Associates	27	0	0.0%
4A	Academic Affairs Professionals	478	9	1.9%
4B	Student Affairs Professionals	225	5	2.2%
4C	Institutional Affairs Professionals	223	13	5.8%
4D	Fiscal Affairs Professionals	478	11	2.3%
4E	External Affairs & Communications Professionals	300	4	1.3%
4F	Facilities Professionals	85	6	7.1%
4G	Information Technology Professionals	642	19	3.0%
4H	Research, Extension, and Other Education Professionals	1063	20	1.9%
4J	Health Science Professionals	158	0	0.0%
4L	Athletic Affairs Professionals	104	1	1.0%
5A	Administrative / Office Support Managers	1	0	0.0%
5B	Administrative / Office Support Supervisors, Leads, and Staff	1385	33	2.4%
6A	Institutional Tech / Paraprofessional	637	15	2.4%
6B	Technology Tech / Paraprofessional	309	14	4.5%
6C	Research / Lab Tech / Paraprofessional	910	8	0.9%
6E	Health Science Tech /Paraprofessional	145	2	1.4%
6F	Environment Tech / Paraprofessional	45	16	35.6%
7A	Skilled Craft Supervisor	59	3	5.1%
7B	Skilled Craftsperson	387	24	6.2%
8A	Service/Maintenance Supervisor	10	2	20.0%
8B	Service/Maintenance Staff	721	15	2.1%
9D	Limited Term and Temporary Positions	1647	21	1.3%
<i>Grand Total</i>		<i>14449</i>	<i>286</i>	<i>2.0%</i>

M. Identification of Problem Areas

Several factors continue to contributed to low percentage rates for employees and applicants who have self-identified as individuals with disabilities and protected veterans, including the recent implementation of the new government

regulations, as well as, a marginal level of comfort for employees and applicants to disclose personal information that, until the implementation of the new guidelines, was considered unlawful to request for employment purposes. This analysis is consistent with an audit of the University self-identification data. Approximately 63.1% of current University employees selected “*Not indicated*” or chose to leave the response blank for their veteran status, while 75.1% also selected “*Not indicated*” or chose to leave the response blank for their disability status.

To raise the comfort level and awareness of the purpose for the self-identification request, the University continues to train employees on the recent regulations as well as provide an understanding of the how the data is used, and inform applicants of the legitimacy of the request and that the data is used solely for statistical purposes. This effort has resulted in an increase in the number of personnel who are providing information about disability and veteran status.²

²17% for veterans and 21% for individuals with disabilities.