

# THE UNIVERSITY of NORTH CAROLINA at CHAPEL HILL

# 2023 EQUAL EMPLOYMENT OPPORTUNITY PLAN Federal Plan

April 1, 2022 - March 31, 2023

UNC-CHAPEL HILL
Equal Opportunity and Compliance Office
214 W. Cameron Ave, Chapel Hill, NC 27599
Chapel Hill, NC 27599
919-966-3576
<a href="http://eoc.unc.edu">http://eoc.unc.edu</a>

# I. Contents

II.	Chancellor's Letter	5
III.	UNC Chapel Hill Equal Opportunity Policy Statement	6
IV. Comp	Establishment of Responsibilities for Implementation of the Written Affirmative Action pliance Plan	6
A.	Equal Opportunity Officer's Responsibilities	6
В.	Equal Employment Opportunity Committee	7
C.	Senior Administrative Officers, Managers, and Supervisors	7
V.	Responsibility for Establishing Procedures for Employment	8
VI.	Identification of Potential Problem Areas	9
VII.	Development and Execution of Action-Oriented Programs	13
A.	Selection	13
B.	Recruitment	13
C.	Promotions	14
D.	Training	15
E.	Facilities	16
VIII.	Internal Audit and Reporting Systems	16
IX.	Attainment of Prior Year Placement Goals	17
X.	EEO Programs for Individuals with Disabilities and Protected Veterans	19
A.	Equal Opportunity Statement	19
В.	Review of Employment Processes	20
C.	Review of Physical and Mental Qualifications	21
D.	Reasonable Accommodations	21
E.	Harassment Prevention	21
F.	Internal Dissemination of the Policy	22
G.	Audit and Reporting System	22
Н.	Responsibility for Implementation	23
I.	Training	23

J.	Applicant and Hiring Data Collection Analysis	23
K.	Utilization Analysis for Individuals with Disabilities (IWD)	25
L.	Identification of Problem Areas	26
Μ.	External Dissemination of the Policy, Outreach, and Recruitment Efforts	26

# **Appendices**

Appendix	Document	Employee Group
А	Employment Action Reports	SHRA
В	Employment Action Reports	EHRA Non-Faculty
С	Employment Action Reports	Faculty
D	Workforce Analysis	SHRA
Е	Workforce Analysis	EHRA Non-Faculty
F	Workforce Analysis	Faculty
G	Job Group Analysis	SHRA
Н	Job Group Analysis	EHRA Non-Faculty
I	Job Group Analysis	Faculty
J	Incumbency v. Availability Analysis	SHRA
K	Incumbency v. Availability Analysis	EHRA Non-Faculty
L	Incumbency v. Availability Analysis	Faculty
М	Placement Goals & Summary Analysis	SHRA
N	Placement Goals & Summary Analysis	EHRA Non-Faculty
0	Placement Goals & Summary Analysis	Faculty

#### II. Chancellor's Letter

TO: University Community

FROM: Kevin M. Guskiewicz, Chancellor

DATE: March 31, 2023

RE: 2023 Equal Employment Opportunity Plan

In compliance with state and federal laws<sup>1</sup>, the University has prepared this 2023 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 the 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.

We take seriously our responsibility as a University community to be guided by equal opportunity principles in every decision impacting our employees. Accordingly, I hereby adopt this Plan as Chancellor and declare it effective March 31, 2023.

Kerin M. Luskiewic	3/30/23	
Chancellor's Signature	Date	

<sup>&</sup>lt;sup>1</sup>The relevant federal regulations, which implement Executive Order 11246 and 13672, can be found at 41 CFR Parts 60-1 and 60-2. The relevant state regulations are set forth in North Carolina Administrative Code, 25 NCAC 01L Section .0101.

# **III. UNC Chapel Hill Equal Opportunity Policy Statement**

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 age, color, disability, gender, gender expression, gender identity, genetic information, national origin, race, religion, sex, sexual orientation, or veteran status as consistent with the University's Policy on Prohibited Discrimination, Harassment and Related Misconduct. No person, on the basis of protected status, shall be excluded from participation in, be denied the benefits of, or be subjected to unlawful discrimination, harassment, or retaliation under any University program or activity, including with respect to employment terms and conditions. Such a policy ensures that only relevant factors are considered, and that equitable and consistent standards of conduct and performance are applied.

# IV. Establishment of Responsibilities for Implementation of the Written Affirmative Action Compliance Plan

This section is required pursuant to 41 C.F.R. § 60-2.17(a).

## A. Equal Opportunity Officer's Responsibilities

The Equal Opportunity Officer responsibilities include the following:

- 1. Continuously monitor the administration of the Plan and ensure its completion by April 1.
- 2. Help devise systems for the implementation of the Plan and the achievement of all program goals.
- 3. Ensure all employees are made aware of the EEO Policy including the Annual EEO Plan and relevant policies and develop strategies to prevent unlawful workplace harassment and retaliation in the workplace.
- 4. Receive and maintain complaints from individuals with respect to employment actions alleged to have been based on discrimination related to protected status.
- 5. Advise management of the EEO program's impact and effectiveness.
- 6. Identify problems with respect to implementation of the Plan.
- 7. Keep members of the University community informed of the progress and problems in administration of the Plan.
- 8. Evaluate the effectiveness of the Plan, including analyzing and maintaining workforce data.
- 9. Serve as the University's liaison with the U.S. Department of Labor, the U.S. Department of Education, the Equal Employment Opportunity Commission, and other appropriate federal agencies with respect to EEO matters.
- 10. Ensure federal laws prohibiting job discrimination are posted in work locations where notices to applicants and employees are customarily posted and easily accessible to applicants and employees with disabilities.

- 11. Establish and maintain effective working relations with groups concerned with EEO and Diversity & Inclusion.
- 12. Coordinate programs to achieve program objectives.
- 13. Present information on the EEO Plan and program to management and employees on a regular basis.
- 14. Ensure all newly hired, promoted, or appointed supervisors and managers complete required EEODF training in accordance with N.C.G.S. 126-16.1.

#### **B.** Equal Employment Opportunity Committee

The Equal Employment Opportunity Committee's responsibilities include the following:

- 1. Serve as a communication link between managers, employees, and EEO staff on aspects of the EEO plan and program.
- 2. Review and evaluate the EEO plan and program.
- 3. Survey the organizational climate and employee attitudes and evaluate the resulting data.
- 4. Identify recruitment resources and other activities decided to strengthen the EEO program.

The work of an Equal Employment Opportunity Committee is currently completed by several Committees and workgroups across campus, including, but not limited to, those described below, in conjunction with members of the Equal Opportunity and Compliance Office and Office of Human Resources.

University Diversity, Equity & Inclusion Council: The University Equity, Inclusion, and Diversity Council at the University of North Carolina at Chapel Hill serves as the advisory and recommending body to the Chief Diversity Officer, and liaisons to schools and colleges across campus. The DEI Council will work closely with the Chief Diversity Officer to help implement Carolina's diversity, equity, and inclusion action plan and to promote knowledge, skills, and best practices. The council will also represent a collective voice to advise the Provost and Chancellor on best practices for structural change.

Dean's Faculty Diversity and Staff Diversity Advisory Committees: The College of Arts & Sciences Advisory Committees aim to improve the climate for diversity in the college by advising the Dean on diversity issues, proposing strategies for creating more diversity in the College as a whole, and supporting diversity efforts in departments and units. Additionally, the committees are charged with critically reviewing the progress of the College in the area of diversity and making recommendations to the Dean on strategies to create a culture of inclusive excellence for faculty, students and staff. Senior Administrative Officers, Managers, and Supervisors.

Senior Administrative Officers of the University include the Vice Chancellor for Human Resources and Equal Opportunity and Compliance, the Senior Associate Vice Chancellor for Human Resources, the Associate Vice Chancellor for Equal Opportunity and Compliance, and the Vice Provost for Equity and Inclusion/Chief Diversity Officer.

These Senior Administrative Officers have responsibility for implementing elements of the EEO Plan, including the following:

- 1. Assist in the development and implementation of the EEO Plan and Program and establish program objectives.
- 2. Assist the EEO Officer in periodic evaluations to determine the effectiveness of the EEO program.

# V. Responsibility for Establishing Procedures for Employment

The University has established procedures for two groups of employees:

- Employees subject to the State Human Resources Act (SHRA Employees)
- Employees exempt from the State Human Resources Act (EHRA Employees)

The University has implemented the Carolina Hiring Playbook (<a href="https://hr.unc.edu/managers/hiring/">https://hr.unc.edu/managers/hiring/</a>) to help HR representatives, hiring managers and other members of the Carolina community navigate our improved hiring process for SHRA and EHRA Non-Faculty positions. The Playbook provides a more efficient and successful hiring system and includes the following ways to improve equity, diversity and inclusion in the hiring process:

- Advertising to underrepresented constituencies
- Choosing diversity-sensitive search committees
- Completion of search committee training
- Use of structured evaluation methods

#### **Procedures for SHRA and EHRA Employment**

A department that needs to fill an open permanent position notifies Employment & Staffing by submitting a request to post a position to their department's Human Resources representative. The Human Resources representative initiates the posting in the applicant tracking system. The Talent Acquisition Partners review the posting to ensure compliance with equal employment opportunity and ADA standards. The position posting includes the Equal Opportunity statement, "The University of North Carolina at Chapel Hill is an equal opportunity employer that welcomes all to apply, including protected veterans and individuals with disabilities." The Talent Acquisition Partners use information from the state job classification, as well as any additional information provided by the hiring department, to review the vacancy announcement and ensure its compliance with State and University requirements. The Talent Acquisition Partners also consult with the department about including additional job duties and essential skills, as well as preferred qualifications in vacancy announcements. In addition, the Talent Acquisition Partners consult with the hiring department to determine the need for additional recruitment advertising in professional journals, newspapers, professional journals, diversity websites, and Historical Black Colleges and Universities to target specific audiences.

The affirmative action process is structured so the Office of Human Resources can comment before key decisions are made, so that their 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, women, individuals with disabilities, or veterans. The monitoring process covers recruiting methods, initial appointments, promotions, reclassifications, transfers, demotions, reinstatements, and salary-setting actions. These decisions and actions are amply documented to ensure the required monitoring.

#### VI. Identification of Potential Problem Areas

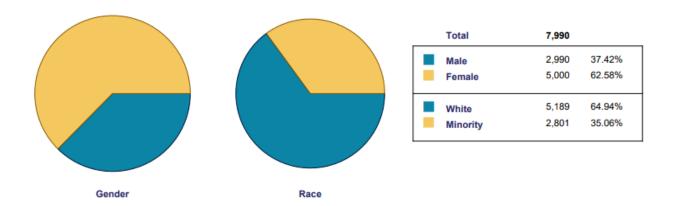
This section is required pursuant to 41 C.F.R. § 60-2.17(b).

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.

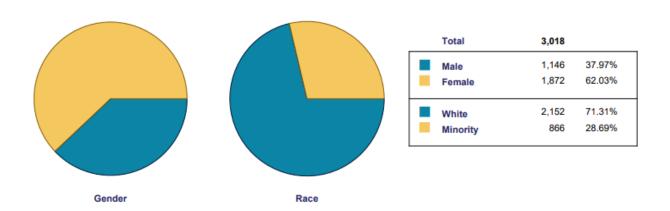
The 2018 U.S. Census occupation data by race and sex was used to identify the percentage of minorities and females in the SHRA and EHRA Non-Faculty Incumbency v. Availability Summary reports as of October 31, 2022, compared to Recruitment Area Availability including county (Alamance, Chatham, Durham, Orange and Wake counties), state and national data. 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) and Associate of American Medical Colleges (AAMC).

The University's recruitment area has experienced an increase in terms of population growth from 2010. The North Carolina Civilian Labor Force Estimates for the five counties in 2010 totaled 800,661 persons, and in 2022 it totaled 1,019,862 persons, which is a 27.3% percent increase from 2010.

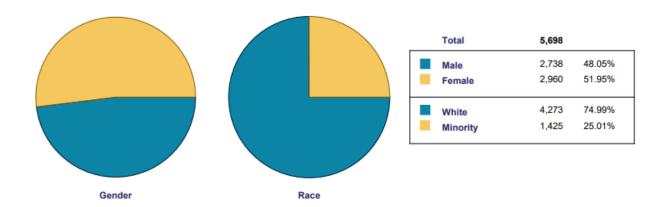
The percentage of minority SHRA employees remained the same from last year at 35% as did the percentage of female SHRA staff at 62% of total SHRA staff. (Chart 1)



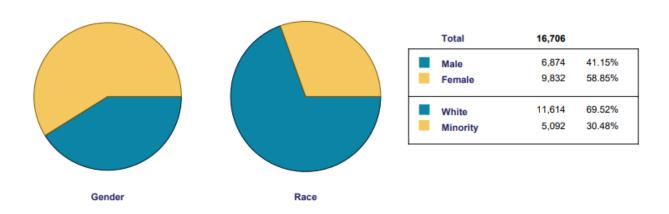
With the current changes to the total number of employees reflected in the Plan, the percentage of minority EHRA Non-Faculty remained the same at 28%. The percentage of female EHRA Non-Faculty increased from 61% to 62% of total EHRA Non-Faculty. (Chart 2)



The percentage of minority faculty overall increased from 24% to 25%. The percentage of female faculty remained the same at 52% of total Faculty. (Chart 3)



For all employee groups, the overall percentage of minority employees is 30%, and the overall percentage of female employees is 58%. (Chart 4)



The University continues to make efforts to increase the number of underrepresented minority and female applicants using 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 women 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 intends to examine periodically the workforce composition and to establish appropriate goals to improve the representation of minorities and women where impediments may exist.

- C. Goals are established when the population of women 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 to improve the representation of women 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 goal 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 ensure 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, 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 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 seeks to make the work environment in the University of North Carolina at Chapel Hill supportive and has made efforts to obtain the views of the employees through surveys and other means.

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 5.6%. In addition, federal regulations also established a utilization goal for qualified individuals with disabilities of 7.0%, for each job group, based on § 503 of the Rehabilitation Act.

The University's 2023 EEO plan represents the 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. Employees are invited to self-identify as individuals with disabilities and/or qualified veterans, per Plan requirements.

The University continued its efforts to increase the self-identification of individuals with disabilities by providing training to employees with current and clear information on the definition of "disability," and the purpose of self-identification, specifically the University's need, use, and confidentiality of the data.

Self-identification of disability status for all employees has increased from 6.65% to 7.20% for the current plan year. The University continues to train employees on the regulations, as well as provide an understanding of how the data is used for individuals with disabilities and veterans.

Training is also delivered via the "Blueprint for Engaged Supervision Training" (BEST) program, where the federal requirements for VEVRAA and Section 503, format and frequency of the data request, data usage, and confidential recordkeeping of the data are explained in the "Non-Discrimination and Harassment Compliance" section of the training. The "From Posting through Probation" employment section of the BEST training was also enhanced to provide a thorough understanding of the data use.

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

This section is required pursuant to 41 C.F.R. § 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 good faith efforts to select persons according to ability and qualifications, while recognizing its commitment to remove barriers to women, minority individuals, individuals with disabilities, and veterans. 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 women, minorities, individuals with disabilities, or veterans, 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 as well as other programs for supervisors, managers and employees.

#### B. Recruitment

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

#### **Recruitment Programs for SHRA Employees**

- Posting the Staff Permanent Openings List daily on the online application system at https://careers.unc.edu. The list is also posted at the Administrative Office Building (AOB), 104 Airport Drive, each Wednesday by Employment & Staffing. Moving forward, paper postings will be eliminated and potential applicants can use the computer kiosks located in the front lobby of the AOB.
- Participating in Job/Career Fairs sponsored by recruiting sources, community organizations, veteran organizations, local Department's of Social Services, and other area employers.
- Periodically contacting community organizations such as the NC Commerce, Workforce Solutions Division as well as organizations for veterans and Individuals with Disabilities.
- Providing the https://careers.unc.edu URL to other agencies, such as the NC Commerce, Workforce Solutions Division, the University of North Carolina-System Office, 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.
- Recommending placing advertisements through Graystone Advertising Group, 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, circaworks.com, insidehighered.com and hercjobs.org.
- Attending and networking at professional meetings such as Triangle Industry Liaison Group (TILG) meetings and Disability: IN NC.
- Applicant screening and referral to departments with open staff positions.

#### **Recruitment Programs for EHRA-NF Employees**

- All above-listed items.
- 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.
- Efforts to create diverse search committees.
- Regular contact with representatives of veteran's groups, including the NC Commerce,
   Workforce Solutions Division and Vocational Rehabilitation Services.
- All positions are posted automatically in UNC Employment Opportunities and Inside Higher Ed Jobs.com.

#### 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 women, the University of North Carolina at Chapel Hill uses the following procedures:

- Providing job training, including such assistance as tuition reimbursement
- Providing an employee evaluation program
- Reviewing work specifications to ensure job-relatedness
- Reviewing promotional decisions and requiring such decisions be justified on a nondiscriminatory basis

#### D. Training

The OHR Organization & Professional Development unit, 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, Blueprint for Engaged Supervision Training (BEST), and other programs for all employees. Participants in BEST are also strongly encouraged to complete state-mandated EEODF classes.

The unit'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 employees. Special training is available upon request from hiring departments and selection committees.

Additional programs address a wide variety of management, supervisory, and employee needs including topics such as Becoming a Team Player, Bringing Out the Best in Others, Communication Essentials, Coaching Skills, Effective Decision Making, Emotional Intelligence, How to Receive Criticism and Make it Work for You, Presentations with Pizzazz, and Using Reason to Resolve Conflict. All workshops are free for UNC-Chapel Hill employees. 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. 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 https://hr.unc.edu/benefits/educational-assistance/.

#### **Other EO Training**

In addition, the Equal Opportunity and Compliance Office offers courses on Preventing Unlawful Harassment in the Workplace, Americans with Disabilities Act (ADA), training for search committees, 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 employees, 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.

#### 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.

# **VIII. Internal Audit and Reporting Systems**

This section is required pursuant to 41 C.F.R. § 60-2.17(d).

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

- Measure the effectiveness of the Plan
- Document employment activities
- Identify problem areas where remedial action is needed
- Determine the degree to which the Plan's objectives have been met

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, award of tenure, layoff, and recall from layoff
- Pay rates and other forms of compensation, including fringe benefits
- Job assignments, job classifications, and job descriptions
- Sick leave, leaves of absence, and any other leave
- Trainings and attendance at professional meetings and conferences
- Any other terms, conditions, or privileges of employment

Responsibility for monitoring analyzing and evaluating the University's equal opportunity progress for EHRA employee's rests with the EHRA Non-Faculty Human Resources unit; for faculty, with the Academic Personnel Office; and for SHRA employees, with the Employment & Staffing and Classification & Compensation units 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 identifying total applicants, total minority applicants, and total female applicants for each position
- Records related 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, EHRA Non-Faculty and Faculty employees are included in Appendices A, B and C respectively.

Procedures used 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 prompt corrective action.

#### IX. Attainment of Prior Year Placement Goals

The University of North Carolina at Chapel Hill developed action-oriented programs designed to accomplish its established goals and objectives, thereby enhancing the employment and advancement opportunities for minorities and females. These efforts resulted in progress toward attaining goals and objectives and strengthening the equal employment opportunity program overall.

These goals are shown in the Plan's Incumbency vs. Availability and Placement Goals and Summary Analysis, as of October 31, 2022. The percentage goals reflect the percent availability for the respective under-represented group in the respective job group. No goal is shown where the University's workforce in the respective job group already exceeds availability as identified by the availability study.

The University was successful in meeting some of the 2022 placement goals for SHRA, EHRA Non-Faculty, and Faculty job groups. The breakdown of placement goals that have been met, as well as

new and continued goals for SHRA, EHRA Non-Faculty and Faculty is as follows:

2023 SHRA Placement Goals			
Minorities	Women		
3C – Administrative Professional Associates	3B – Managers		
4A – Academic Affairs Professionals	als 4F – Facilities Professionals		
4E – External Affairs & Comms. Professionals 4G – Information Technology Professiona			
4F – Facilities Professionals	4K – Environment Professionals		
4G – Information Technology Professionals	4L – Athletic Affairs Professionals		
4J – Health Science Professionals	5A – Administrative/Office Support Managers		
6B – Technology Tech/Paraprofessionals	6B – Technology Tech/Paraprofessionals		
6C – Research/Lab Tech/Paraprofessionals	6F – Environment Tech/Paraprofessionals		
6E – Health Science Tech/Paraprofessionals	7B – Skilled Craftperson		
6F – Environment Tech/Paraprofessionals	8A – Service/Maintenance Supervisor		
7B – Skilled Craftperson	8B – Service/Maintenance Staff		
8A – Service/Maintenance Supervisor			
9D – Limited Term & Temporary Positions			
2022 Minority Goals Met	2022 Female Goals Met		
4D – Fiscal Affairs Professionals	None		
6A – Institutional Tech/Paraprofessionals			
2023 EHRA Non-Fac	ulty Placement Goals		
Minorities	Women		
4C – Institutional Affairs Professionals	1E – Heads of Admin. Div., Dep't, & Ctrs		
	4L – Athletic Affairs Professionals		
2022 Minority Goals Met	2022 Female Goals Met		
4E – External Affairs & Comms. Professionals	None		
6B – Technology Tech/Paraprofessionals			
2023 Faculty P	lacement Goals		
Minorities	Women		
College of Arts & Sciences – Germ./Slav. Lang/Lit	College of Arts & Sciences - Biology		
School of Law	College of Arts & Sciences – Exercise & Sports		
Health Policy Management Environ. Sci Engineering			
School of Public Health – Biostatistics	Health Policy Management		
	Kenan Flagler Business School		
	School of Pharmacy		
2022 Minority Goals Met	2022 Female Goals Met		
None	College of Arts & Sciences – Biomedical Engr.		
None	conlege of 7 and at belief by		

The 2023 Plan contains data for all permanent and temporary, part-time and full-time employees. Numerous circumstances can impact workforce projections by race, sex and job group so that these are not always precise. The number of new positions that might be established and turnover in this dynamic labor market cause such projections to be estimates. In this context, percentage workforce

goals to which the University is committed have been set where minorities and/or women are shown, by availability, to be under-represented in the University's workforce. The objective or "goal" is established to make good faith efforts that would result in an increase in the number of minorities or women in the workplace that equals or exceeds the number of minorities or women that are estimated to be available to work within the identified positions.

# X. EEO Programs for Individuals with Disabilities and Protected Veterans

This section is required pursuant to 41 C.F.R. Parts 60-741 and 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 they are 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; 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.

#### **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 <u>Policy on Prohibited Discrimination</u>, <u>Harassment and Related Misconduct</u>, 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 using 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 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.

#### **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 lavoffs.

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:

- Disabled veteran 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.
- Recently separated veteran 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.
- Active-duty wartime or campaign badge veteran 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.
- Armed Forces service medal veteran a veteran who, while servicing on active duty in the U.S. military, ground, naval, or air service participated in a U.S. 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 screen out individuals with disabilities or qualified veterans. All qualification requirements approved by the University are job-related or consistent with business necessity.

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, using the format prescribed by the OFCCP in compliance with 41 CFR 60-300.42(a).

## 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 Accommodations

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 University's policy 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 ADA Coordinator, 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 based on protected status, including disability and veteran status.

Employees with complaints alleging discrimination or harassment because of their disability and/or veteran status are encouraged to use the Policy on Prohibited Discrimination, Harassment and Related Misconduct. The policy prohibits retaliation against an individual because of their good faith participation in the reporting, investigation, or adjudication of violations of the policy.

Employees are also encouraged to use grievance procedure(s) currently in effect at the University.

Employees or applicants should address their concerns to:

Equal Opportunity and Compliance Office 214 W. Cameron Avenue, Chapel Hill, NC (919) 966-3576

#### F. Internal Dissemination of the Policy

The University disseminates this policy internally as follows:

- All employees are advised annually of the University's policy;
- The University informs all employees and prospective employees annually of its commitment to engage in affirmative action to increase employment opportunities for individuals with disabilities and protected veterans;
- The policy is included in employee orientation and is discussed thoroughly in the Blueprint for Engaged Supervision in Training (BEST) program;
- Through completion of the NC Office of State Human Resource's *Equal Employment Opportunity and Diversity Fundamentals* (EEODF) training course; and
- 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.

## **G.** Audit and Reporting System

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

- Measure the effectiveness of the University's EEO program;
- Indicate any need for remedial action;
- Determine the degree to which the University's objectives have been met;
- 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;
- 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;
- Measure the University's compliance with the equal employment opportunity program's specific obligations; and
- Take necessary action to bring the program into compliance where the program is found to be deficient.

#### H. 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.

#### I. 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.

# J. Applicant and Hiring Data Collection Analysis

Current federal regulations have established an employment objective for protected veterans, based on VEVRAA, which equals a benchmark of 5.6%. In addition, federal regulations also established a utilization goal for qualified individuals with disabilities of 7.0%, for each job group, based on § 503 of the Rehabilitation Act.

It is the University's intention to establish appropriate goals to improve the representation of individuals with disabilities and veterans where disparities exist. The University continues to promote measures to increase the employee self-identification participation rate to ensure that the analysis of the Plan reflects a more accurate accounting of the percentage of individuals with disabilities and veterans in our workforce. Training was developed to provide employees with current and clear information regarding the definition of an individual with a disability, and its relation to self-identification, specifically the University's need, use, and confidentiality of the data.

The percentage of University employees who have identified as protected veterans and individuals with disabilities is 1.79% and 7.20% respectively. The number of job groups which met the IWD Utilization Goal during the Plan year increased from 18 to 22. Our current hiring benchmark for protected veterans is 2.0%.

## **Applicant and Hiring Data Collection Analysis**

Total Number of Job Openings/Jobs Filled	4,336		
Total Number of	59,069	Number of Applicants	
Applicants for All		Self-Identifying as:	
Jobs			
		Individuals with	5,330
		Disabilities	
		Protected Veterans	1,249
Total Number of	3,752*	Number of Hired	
Applicants Hired		<b>Individuals Self-</b>	
		Identifying as:	
*This number does not inclu	de the 732 employees	Individuals with	222
promoted and 1,004 employ	ees transferred.	Disabilities	
		Protected Veterans	46

After analysis of applicant data, 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. It was found that applicants who listed their referral from veteran and/or disability related resource were not consistent in also self-identifying their veteran and/or disability status. This inconsistency has had 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.

\*\*The rest of this page is intentionally blank.\*\*

# K. Utilization Analysis for Individuals with Disabilities (IWD)\*\*

Job Group	Job Group Name	*Employees	IWD#	IWD %
1A	Top Executive Officers	**	**	**
1B	Senior Institutional & Chief Functional Officers	30	**	**
1C	Institutional Administrators	25	**	**
1D	Heads of Academic Divisions, Departments, & Centers	6	**	**
1E	Heads of Administrative Divisions, Departments, & Centers	38	**	**
2A	Faculty / Corps of Instruction	5698	206	3.62%
2B	Professionals with Academic Rank	12	*	**
3A	Administrative Unit Heads / Professionals	67	7	10.45%
3B	Managers	16	**	**
3C	Administrative Professional Associates	58	10	17.24%
4A	Academic Affairs Professionals	481	55	11.43%
4B	Student Affairs Professionals	277	34	12.27%
4C	Institutional Affairs Professionals	318	51	16.04%
4D	Fiscal Affairs Professionals	680	79	11.62%
4E	External Affairs & Communications Professionals	385	25	6.49%
4F	Facilities Professionals	94	9	9.57%
4G	Information Technology Professionals	680	56	8.24%
4H	Research, Extension, and Other Education Professionals	1347	95	7.05%
4J	Health Science Professionals	129	12	9.30%
4K	Environment Professionals	**	**	**
4L	Athletic Affairs Professionals	139	**	**
5A	Administrative / Office Support Managers	**	**	**
5B	Administrative / Office Support Supervisors, Leads, and Staff	1330	179	13.46%
6A	Institutional Tech / Paraprofessional	438	43	9.82%
6B	Technology Tech / Paraprofessional	327	41	12.54%
6C	Research / Lab Tech / Paraprofessional	1074	104	9.68%
6E	Health Science Tech /Paraprofessional	186	19	10.22%
6F	Environment Tech / Paraprofessional	34	**	**
7A	Skilled Craft Supervisor	26	6	23.08%
7B	Skilled Craftsperson	325	36	11.08%
8A	Service/Maintenance Supervisor	**	**	**
8B	Service/Maintenance Staff	631	60	9.51%
9C	Trainees/Fellow /Interns (Students Enrolled at Another Institution)	**	**	**
9D	Limited Term and Temporary Positions	1845	64	3.47%
Grand Total		16,706	1,202	7.20%

#### L. Identification of Problem Areas

Several factors continue to contribute to the low number of employees and applicants who have provided self-identification information on their disability and veteran status, including the 2015 implementation of the most recent Section 503 and VEVRRA 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 previously considered unlawful to request for employment purposes. This analysis is consistent with an audit of the University self-identification data.

To provide a better understanding of the information related to individuals with disabilities and veterans, as well as 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 and provide information regarding the use of the data solely for statistical purposes. While the University's continued efforts have resulted in a decrease in the percentage of University employees who chose not to provide their veteran status, the number who chose not to provide this information remains high.

# M. 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 to improve the representation of individuals with disabilities and veterans where disparities exist. The ongoing COVID-19 led to a decrease in the number of available opportunities for outreach and recruitment during the Plan year. The following are lists of outreach activities the University participated in to fulfill its commitment to providing equal employment opportunities to individuals with disabilities and veterans.

Recruitment/Outreach Effort	Location	Target Audience
Hire X Career Fair: Diversity	Virtual	Diverse candidates/
		veterans
Hire X Career Fair (four dates)	Virtual	Diverse candidates/
		veterans
Recruit Military Virtual Fair	Virtual	Veterans
Department Relationships with	Ongoing	Individuals with
Vocational Rehab		Disabilities

<sup>\*</sup>Includes SHRA, EHRA Non-Faculty, and Faculty.

<sup>\*\*</sup>Specific values for job groups with fewer than five employees are not included.

<sup>\*\*\*</sup>Job groups with a placement goal are indicated in bold.

In addition, the University also undertakes and considers the following activities 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 https://careers.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 https://careers.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, circaworks.com, 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).
- 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.