



EXECUTIVE ORDER 11246 AFFIRMATIVE ACTION PROGRAM  
FOR WOMEN AND MINORITIES

**TEXAS A&M UNIVERSITY**

January 1, 2009 to December 31, 2009

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## INTRODUCTION

Texas A&M University (Texas A&M) is a public land-grant, sea-grant and space-grant institution of higher education headquartered in College Station, Texas, providing educational, research and outreach services since 1876. The organization is led by the President of Texas A&M who provides leadership to 8,600 faculty and non-faculty employees headquartered in College Station, Texas. Reporting directly to the President is an executive leadership team who oversees the administration of more than 190 departments, providing 250 degree programs in 10 colleges to over 46,000 undergraduate students and 8,500 graduate students, with a myriad of programs and services in support of the university's mission.

The departments are identified based on the university's administrative organizational structure, for which there is an assigned department head or director (referred herein as department head) and for which there are assigned active employees. The department head has overall responsibility for administration of the department including the recruitment, retention and equal employment opportunity of their employees.

The Texas A&M organizational structure is composed of the Office of the President, Vice Presidents and Executive Staff:

- Office of the President
- Provost and Executive Vice President for Academics
- Executive Vice President for Operations
- Vice President and Associate Provost for Diversity- Interim
- Vice President and Associate Provost for Information Technology
- Vice President and CEO Texas A&M at Galveston
- Vice President for Facilities
- Vice President for Finance and Chief Financial Officer
- Vice President for Global Initiatives
- Vice President for Governmental Affairs
- Vice President for Institutional and Federal Affairs
- Vice President for Marketing and Communications
- Vice President for Research - Interim
- Vice President for Student Affairs
- Vice President for University Advancement
- Senior Executive for Development
- Special Advisor to the President
- Director of Athletics

The current organizational chart of Texas A&M executive leadership offices is available online at the university's web site <http://www.tamu.edu>. Organizational charts for division, academic unit, college and department levels are available on their associated web sites.

Texas A&M has developed a comprehensive Affirmative Action Program (AAP) for women and minorities and for individuals with disabilities and veterans. The AAP provides the principles and policies that commit the university to equal employment opportunity and documents the employment practices and procedures for administration of the AAP. The AAP is developed in accordance with the U.S. Labor Department Office of Federal Contract Compliance Programs

(OFCCP) recommendations for compliance with Executive Order 11246.

The Affirmative Action Program for Women and Minorities is organized into seven sections following the topics suggested by 41 C.F.R. § 60 as necessary components of an effective affirmative action program. Separate utilization analyses are prepared for women and minorities in all job groups and at all levels of the organization's workforce; and the percentage placement goal is calculated to achieve full utilization of women and minorities with requisite skills in the relevant labor markets.

The Affirmative Action Program for Individuals with Disabilities and for Protected Veterans is organized into ten sections following the topics suggested by 41 C.F.R. § 60-741 and 41 C.F.R. § 60-250 as necessary components of an effective, results-oriented affirmative action program.

Texas A&M University Human Resources (Human Resources) is responsible for developing and monitoring the university's AAP. The AAP plans are compiled annually and data are calculated to show the results of ongoing program efforts. Human Resources maintains the primary support data for the AAP. The AAP plans and all associated support data are made available, upon request, to the OFCCP in accordance with its responsibility to enforce Executive Order 11246 and other legislation applicable to the university as a federal contractor and recipient of federal funds.

The terms "job group", "availability", "problem area", "underrepresentation", "concentration" and "disparate treatment" appearing in the AAP are terms that OFCCP regulations may require the university to use. These terms have no independent legal or factual significance whatsoever outside the context of OFCCP regulations. Although the university uses these terms in good faith in connection with its AAP, such usage does not signify that the university agrees these terms are properly applied to any particular factual situation or have any independent meaning outside the context of OFCCP regulations.

## STATEMENT OF POLICY

It is the policy of Texas A&M, through the Texas A&M University System, to assure equal employment and advancement opportunities for all individuals and to take additional initiatives to recruit, employ, train and promote qualified members of underrepresented groups. The university does not discriminate in employment opportunities or practices on the basis of race, color, religion, sex, national origin, age, disability or veteran status, or any other characteristic protected by law. All university employees have the responsibility and accountability to create an environment in which individuals are treated with dignity and respect and are afforded equal treatment under the law.

This policy is designed to make affirmative action considerations an integral part of the regular process of employee selection, retention and advancement. Texas A&M is committed to the specific and results-oriented procedures established by this AAP. These procedures and good faith efforts are designed to achieve the full representation of all university employees at all levels and in all parts of the workforce through affirmative action.

Texas A&M is committed to meeting the following objectives:

- Provide equal employment and advancement opportunities for all individuals;
- Increase the utilization of underrepresented workforce populations, including women and minorities, at all levels of the workforce, in proportions at least equal to the respective proportions of women and minorities with requisite skills in the relevant labor markets;
- Publish and disseminate policies on equal opportunity, affirmative action and diversity;
- Provide an environment that fosters the professional development of each employee and is free of harassment and illegal discrimination;
- Assure discriminatory and disparate policies and practices are not integrated into university programs and initiatives; and,
- Utilize internal audit and reporting systems to evaluate and measure the effectiveness of affirmative action program activities.

## I. GENERAL INFORMATION

### A. Purpose

Texas A&M has developed an AAP that meets the requirements of Executive Order 11246 and OFCCP Title 41 C.F.R. § 60. This AAP establishes specific and results-oriented procedures to which university management is committed. These procedures, coupled with good faith efforts, are designed to achieve the full representation of a diverse workforce, including women and minorities, at all levels and in all parts of the workforce through affirmative action.

Texas A&M is required to act affirmatively in all employment actions and to prepare an AAP that will be administered without regard to race, color, religion, sex, national origin, age, disability or veteran status. The AAP annually evaluates the initiatives and strategies in support of the university's programs to achieve equal employment opportunities. The annual review includes an evaluation of the representation of women and minorities in the Texas A&M workforce as compared with the representation of women and minorities with requisite skills in the relevant labor markets for similar jobs. The implementation of the AAP is designed to correct problem areas and support recruitment goals.

### B. Applicability

Texas A&M is a federal contractor and recipient of federal funds and is subject to the requirements for federal contractors under Executive Order 11246 and OFCCP implementing regulations.

The AAP is prepared for all offices, divisions, academic units, colleges and departments reporting to the President on behalf of employees headquartered in College Station, as well as Texas A&M employees assigned to the Texas A&M University Qatar campus. The Texas A&M University-Galveston campus prepares and administers its own AAP.

The President has designated overall administration of the AAP to Human Resources. Human Resources will implement AAP initiatives, disseminate the appropriate policies and goals, and internally monitor and report on the effectiveness of the action-oriented programs. Human Resources has delegated development and day-to-day management of the AAP to its HR Management Services departmental unit. Additionally, all university departments share a responsibility to further the principles of equal employment opportunity for the recruitment, retention and advancement objectives of this AAP.

The inclusive dates of this AAP are from January 1, 2009 to December 31, 2009. Analytical data for the purpose of evaluating the AAP are collected on October 31, 2008 and during the academic year September 1, 2007 to August 31, 2008. This time period allows the AAP to be published in a manner that provides managers with the most current data available to make employment decisions.

C. Equal Employment Through Affirmative Action

1. Equal Employment Opportunity

In accordance with the Texas A&M University System Policy 08.01, *Civil Rights Protections and Compliance*, and associated Regulations, Texas A&M is committed to providing equal opportunity for employment to all persons and will additionally take affirmative action initiatives to recruit, employ, train and promote qualified members of protected groups who may have been previously excluded.

Texas A&M does not discriminate in employment opportunities or practices on the basis of race, color, religion, sex, national origin, age, disability or veteran status or any other characteristic protected by law. Employment decisions will be based on valid job requirements, merit, qualifications and abilities of the employee or applicant, and reflect the university's obligation to fill each position with the best talent available.

Affirmative action does not mean lowering standards of excellence or hiring unqualified persons. Affirmative action means that Texas A&M will make good faith efforts to increase the opportunities for women and minorities to participate in all areas of the workforce by making positive steps to remove discriminatory barriers. The standard of excellence that assures quality performance is central to an effective AAP. Legitimate, essential and business necessity-based standards and requirements provide for a fair and equitable employment environment for all persons.

2. Affirmative Action Initiatives

Affirmative action initiatives will be incorporated into all Texas A&M employment practices, compensation and other personnel actions based on abilities and qualifications.

- a. Applicants will have an equal opportunity for jobs for which they are qualified.
- b. Vacant positions will be advertised with external recruiting services to actively recruit women and minorities in addition to the Texas A&M Online Employment Service official web site.
- c. Advertised vacant positions will be posted with the Equal Employment Opportunity / Affirmative Action (EEO/AA) statement.
- d. Outreach and recruitment efforts will inform applicants and employees of the university's commitment to a culturally and religiously diverse workforce and positive work environment.

- e. Women and minorities will be actively recruited for positions at all levels.
- f. Women will not be penalized in their employment due to maternity leave.
- g. No distinction will be made between the treatment of women or men in regard to marital status.
- h. Leave policies will treat employees equally in terms of any disabilities or illnesses.
- i. No distinction will be made between men and women or between minorities and non-minorities with regard to opportunities, wages, hours or other conditions of employment.
- j. Salary and wage rates will be based on actual job requirements, regardless of the employee's race or sex.
- k. Women and minorities are eligible for and will be encouraged to participate in management training programs.
- l. The Texas A&M University System Regulation 08.01.01, *Civil Rights Compliance*, commits the university to a preventive process on sexual harassment issues.

#### D. Grievance Procedures

Positive employer/employee relations are aided by effective communications concerning employment expectations. Satisfactory resolution of grievances and equitable application of appropriate policies, regulations and rules are essential to employee morale and productivity. Human Resources is charged with assisting employees in resolving, where possible, any complaint of discrimination or noncompliance with federal regulations at the lowest level of management. The Texas A&M University System Regulation 32.01.01, *Complaint and Appeal Procedure for Faculty Members* and Texas A&M University System Regulation 32.01.02, *Complaint and Appeal Process for Non-faculty Employees* outlines established procedures intended to cover all grievance situations.

##### 1. Allegations of Discrimination or Harassment

Employees with questions or concerns about any type of discrimination in the workplace are encouraged to bring these issues to the attention of their immediate supervisor, to Human Resources or to the President. Employees can raise concerns and make reports without fear of reprisal, harassment, intimidation, threats, coercion or discrimination because they: (1) file a complaint with the university or with federal, state or local agencies; (2) assist or participate in any investigation, compliance review, hearing, or any other activity related to the administration of any federal, state or local equal employment opportunity or

affirmative action statute; (3) oppose any act or practice made unlawful by federal, state or local law requiring equal employment opportunity or affirmative action; or, (4) exercise any other employment right protected by federal, state or local law or its implementing regulations.

## 2. Complaint Process for Allegations of Discrimination

### a. Complaints Received by Applicants, Employees or Internal Agencies

Discrimination complaints, which may allege that a person has been denied employment, a promotion or some other benefit or opportunity because of race, sex, color, national origin, religion, age, disability or veteran status, are subject to the procedures as set forth in Texas A&M University System Regulation 32.01.01 and 32.01.02.

All employee complaints and grievances are viewed as employee relations issues. Human Resources manages grievances from non-faculty employees. The Dean of Faculties and Associate Provost manages grievances from faculty employees.

Regardless of the origin of the complaint, management of Human Resources and the appropriate deans, department heads or directors share all necessary information and are mutually cooperative throughout the process of investigating and resolving the complaint.

### b. Complaints Received by External Agencies

When an internal complaint is not resolved, employees may, at their discretion, seek assistance from state or federal agencies. Upon receipt of this type of complaint, Human Resources will coordinate the resolution or disposition of the complaint with the appropriate office and the mutual cooperation of its dean, department head or director.

## II. DISSEMINATION OF AFFIRMATIVE ACTION POLICIES AND PROCEDURES

Texas A&M recognizes that for a comprehensive AAP to be successful the policy and procedures must be broadly communicated to both management personnel and employees, as well as the community, professional organizations, vendors and recruiting services. The university will implement, or continue to implement, external and internal dissemination procedures, all of which are the responsibility of Human Resources, to communicate its obligation to engage in affirmative action efforts for equal employment opportunities.

The Texas A&M University System web site provides public access to applicable policies, regulations and rules on equal employment opportunity and affirmative action, specifically [Texas A&M University System Policy 08.01, \*Civil Rights Protections and Compliance\*](#).

A. External Dissemination

Texas A&M will use appropriate communication techniques for outreach and positive recruitment of qualified individuals at all levels of the organization.

1. The Affirmative Action Program for Women and Minorities will be made available online at the web site for Human Resources and provided in print to be maintained in the Reserve Section of the Texas A&M University Sterling C. Evans Library.
2. The Equal Employment Opportunity / Affirmative Action statement, "Texas A&M University is an equal opportunity, affirmative action employer committed to diversity" will be incorporated into appropriate employment and recruitment materials. Reference to this clause may be abbreviated "EEO/AA" if space does not permit the entire statement.
3. Human Resources will continue to disseminate information externally to and engage in discourse with community and state organizations, colleges and schools about equal employment opportunity and affirmative action matters.
4. Human Resources will continue to work with local organizations and institutions that have a special interest in employment of women and minorities.
5. Human Resources will continue to inform major recruiting sources of the university's commitment to affirmative action for equal employment opportunities for women and minorities. A list of applicable employment openings is provided to the Texas Workforce Commission for inclusion on their web sites.
6. Human Resources will continue to include the EEO/AA statement in all recruitment literature, employment promotional information, hiring and employment process training materials and on the university's Online Employment Service web site. Photographs of employees will include representation of women, minorities and individuals with disabilities when employees are featured in these publications.
7. A statement relating to the EEO/AA policy will be provided to all covered contractors.

B. Internal Dissemination

Texas A&M recognizes that even a strong outreach program will be ineffective without adequate internal support from employees at all levels of the organization. The following activities are designed to foster understanding, acceptance and support among university executives, managers, supervisors and other employees and to encourage such persons to take necessary actions to aid the university in meeting its obligations.

1. Dissemination of Policy

- a. Each year the President will issue a memorandum to all employees reaffirming the EEO/AA policy statement.
- b. The AAP will be updated annually and made available online at the Human Resources web site and provided in print for the Reserve Section of the Sterling C. Evans Library on campus. University department heads and directors are encouraged to make all individuals involved in personnel decisions aware of these documents and their contents.
- c. Human Resources will review the AAP with university executive staff and employees who work in appropriate human resources positions and discuss each employee's responsibility to assist the university in meeting its objectives.
- d. Managers and supervisors will be informed about the university's EEO/AA policy by dissemination of the AAP, presentations conducted by Human Resources, hiring process guidelines on the Human Resources web site, or university-sponsored educational programs, which may include workshops on supervisory skills, the hiring process and job position descriptions.
- e. Photographs and articles in employee handbooks and similar employee publications, whether in print or online, will continue to include representation of women and minorities.
- f. All university departments are provided guidance on posting the federally required EEO/AA posters in locations viewable by employees and applicants. Human Resources monitors compliance with this requirement.

2. Training

- a. Hiring managers and supervisors will be provided with access to online training materials, tools and resources on the Human Resources web site. Topics include the university's commitment to equal opportunity, affirmative action and diversity, the university's EEO/AA policy, and how to make fair, consistent and documented hiring decisions.
- b. Training and counseling will be made available to employees, supervisors and administrators in order to gain positive support and understanding of the AAP. The university may conduct special seminars and conferences to address topics pertinent to affirmative action, equal employment opportunity and diversity.

- c. Within 30 days of employment newly hired employees will be required to complete an online training course supporting EEO/AA, called "Creating a Discrimination-Free Workplace," available at the Texas A&M University System web site. Incumbent employees will retake the training course every two years.

### III. DESIGNATION OF RESPONSIBILITY

To assure consistent endeavor and progress toward the goal of equal employment opportunity, executive and management employees have been designated with specific responsibilities for carrying out the policy and procedures of this AAP. Full effectiveness of the program also requires the participation of all university departments and employees in support of EEO/AA.

#### A. Responsibilities of University Officials

1. The President assumes overall responsibility for success of the AAP and has:
  - a. Designated the Chief of Staff and Interim Assistant Vice President as the university's Equal Employment Opportunity Officer (EEO Officer) with specific authority and responsibility for overall equal employment opportunity and affirmative action administration university-wide; and,
  - b. Further delegated to all executives, deans, vice presidents, department heads, directors, managers and supervisors the responsibility to share in the day-to-day implementation of the program within their organizational units.
2. The EEO Officer has been given top management support and staffing to administer implementation of the AAP and will continue to:
  - a. Oversee all aspects of EEO/AA programs for all organizational units in the university and assure Human Resources has the resources and staff to effectively manage and monitor the AAP;
  - b. Develop and disseminate policy statements, organizational procedures, program goals and reports to the President and executive leadership on all aspects of the organization's EEO/AA programs and initiatives;
  - c. Serve as liaison between Texas A&M, government regulatory agencies, and organizations representing women, minorities, individuals with disabilities and Protected Veterans, including community groups and vocational rehabilitation organizations;
  - d. Coordinate with the offices of Provost and Executive Vice President for Academics, Vice President and Associate Provost for Diversity and Dean of Faculties and to assure employment practices, monitoring and reporting systems are implemented for faculty employees;

- e. Serve as the primary EEO/AA specialist and information source within the organization and provide the President and executive leadership the latest developments in affirmative action areas; and,
  - f. Administer the employee formal or informal complaint procedures and mediation for all non-faculty employees and provide guidance, as appropriate, to the Dean of Faculties and Associate Provost for faculty employees.
3. The Chief of Staff and Interim Assistance Vice President has delegated to the Executive Director of Human Resources responsibility for managing equal employment opportunity and affirmative action programs as the university's Affirmative Action Officer (AA Officer). The AA Officer has been given management support and staffing to continue to:
- a. Provide leadership to the development of procedures and processes that support the organization's commitment to equal opportunity and affirmative action employment for all persons;
  - b. Coordinate the development and implementation of the AAP, utilizing associated statistical analyses and disseminating the program internally and externally;
  - c. Develop, implement and monitor reporting systems that measure the effectiveness of the university's programs and that would indicate the need for remedial action, when necessary;
  - d. Develop strategies that assure equal employment opportunities and take additional initiatives to recruit, select and advance women and minorities at all levels of the workforce;
  - e. Develop training and provide resources to all levels of the workforce in matters concerning equal employment, affirmative action, discrimination, harassment and diversity initiatives;
  - f. Develop systems to audit personnel activities and practices to assure compliance with the technical aspects of applicable federal laws and regulations;
  - g. Review employment practices, selection and promotion procedures and training programs to evaluate the organization's adherence to equal employment opportunity and affirmative action initiatives;

- h. Develop training programs that encourage all employees to continue their education, skill and career development and that assure women and minorities are afforded the full opportunity to participate in such training;
- i. Keep informed of all new or updated regulations to assure that the organization is in compliance with federal and state laws and communicate or respond to questions relating to equal employment and affirmative action issues, as appropriate, with executive leadership and employees;
- j. Establish and monitor policies concerning the handling of employee complaints in a prompt and equitable manner; and,
- k. Establish and maintain contact with individuals and organizations representing women and minorities to stay abreast of potential problem areas and communicate the university's AAP.

B. Responsibilities of Deans, Vice Presidents and Department Heads

- 1. Provide leadership and support within their organizational units to administer, support and comply with the AAP and take additional initiatives to create a campus community that fosters diversity;
- 2. Review employment decisions to assure compliance with equal employment opportunity and affirmative action including, but not limited to, recruitment, selection, transfers, promotions, terminations, compensation, benefits, training programs, social and recreational activities;
- 3. Administer applicable grievance processes for non-faculty and faculty employees or applicants and assist in the review, investigation and disposition of grievances or complaints from within their units;
- 4. Participate in periodic review of employment practices, training programs, compensation, social and recreational programs to assist with identification of problem areas or barriers related to EEO/AA policy and procedures and recommend corrective actions if necessary; and,
- 5. Share in all aspects of the administrative responsibilities for the implementation and monitoring of the AAP.

C. Responsibilities of Managers and Supervisors:

- 1. Implement and support equal opportunity and affirmative action employment practices within their organizational unit. This responsibility includes recruitment and selection of new employees, advancement opportunities, training programs, identification of problem areas, and other actions as contained in this AAP;

2. Implement measures to prevent discrimination or harassment of employees for any reason, whether race, sex, religion, color, national origin, age, disability, veteran status or any other status protected by law;
3. Document the disposition of applications in the applicant pools during the hiring process for all posted job vacancies. The Texas A&M Online Employment Services web site will be used for non-faculty hiring processes; and,
4. Provide development opportunities for all employees through professional, personal, educational or skill development training and assure that women and minorities are afforded full opportunity to participate in such training programs.

D. University Offices Supporting EEO/AA

1. The department of Procurement Services is responsible for including EEO/AA clauses in contracts awarded under government prime contracts and subcontracts, as appropriate under applicable regulations. Procurement Services will also assure legal requirements for suppliers and subcontractors are met as required by Executive Order 11246. A copy of the certifications or documentation of EEO/AA clauses will be provided to Human Resources, as requested, for auditing purposes.
2. The department of Policy & Practice Review is responsible for overseeing the employee grievance procedures for staff positions as set forth in Texas A&M University System Regulation 32.01.02, Complaint and Appeal Process for Non-faculty Employees. The Dean of Faculties and Associate Provost is responsible to oversee grievances from faculty employees according to Texas A&M University System Regulation 32.01.01, Complaint and Appeal Procedure for Faculty Employees.
3. Policy & Practice Review will respond to federal and state discrimination complaints filed against university employees and will coordinate the resolution or disposition of the complaint with the appropriate office and the mutual cooperation of the appropriate dean, department head or director.

#### IV. MONITORING AND REPORTING PROCESS

A. Procedures

Human Resources is responsible for developing and monitoring data used for affirmative action programs and initiatives and maintaining the supporting documentation of the AAP.

1. Human Resources will produce or obtain annual reports that provide for workforce analyses of budgeted faculty and non-faculty employees. These analyses will inform the annual review of the representation of women and minorities and comparisons with prior years for affirmative action initiatives.

2. Workforce data will be October 31 of each year, and recruitment, availability and other data will be obtained annually for the period September 1 through August 31 so that sufficient time can be dedicated to review and evaluation prior to preparation of the annual AAP documentation and report.
3. Human Resources will coordinate, as necessary, with the Texas A&M University System, Dean of Faculties and Associate Provost, Vice President and Associate Provost for Diversity and other offices to obtain data, statistics or program strategies and outcomes to prepare the annual AAP.
4. Annual statistical and supporting documentation for preparation of the AAP will be maintained in Human Resources.

#### B. Data Sources

Human Resources will obtain, compile, review, validate and arrange data obtained from internal and external sources for affirmative action analyses, reports and monitoring.

1. The Texas A&M University System Budget/Payroll/Personnel (BPP) database is used to obtain employee personnel data for the workforce analysis. The BPP database provides the following data related to affirmative action program analyses: employee name, title, department, race, sex, EEO category, salary, hire date, and employment actions and dates.
2. The Texas A&M recruitment and applicant web site, Texas A&M Online Employment Service and its associated database system outsourced to PeopleAdmin, Inc., is used to generate recruitment and availability data for affirmative action analyses. Texas A&M maintains sole control and responsibility of data on all aspects of recruitment, applications and selections for positions posted on Texas A&M Online Employment Services. Data are used for analyses of applicants, hires, internal and external availability and recruitment advertisement effectiveness.
3. The office of the Dean of Faculties and Associate Provost provides annual data on the faculty recruitment process, applicant flow, and external availability of women and minorities in specific academic disciplines. Data are used for analyses of applicants, hires, and internal and external availability as available.
4. Human Resources maintains database systems on position titles, position descriptions, exempt and non-exempt categories, salary ranges, education requirements, career ladders and EEO categories. These data are used to evaluate annually the appropriate formation of the AAP job groups.

#### C. Job Groups

Texas A&M has grouped its job titles into job groups based on similarity of content, opportunities and wage rates. Similarity of content refers to the duties and

responsibilities of the job titles within the job group. Similarity of opportunities refers to training, transfers, promotions, pay, mobility, and other career enhancement opportunities offered by jobs within the job group. The university has considered the size of its workforce and the structure of its compensation system when evaluating the degree of similarity in wage rates appropriate for job group formation.

## 1. Job Group Formation

For the purposes of conducting meaningful workforce analyses, all active job titles are grouped by duties within the broad occupational categories of the Integrated Postsecondary Education Data System maintained by the U.S. Department of Education, known as the EEO categories. Development of the university's AAP job groups was consistent with the following guidelines:

- a. Jobs within a group have similar content, wage rates and opportunities;
- b. Jobs with substantially different qualifications should not be combined;
- c. Job groups should reflect, as closely as possible, the logical structure inherent to the organization;
- d. Entry-level jobs should not be grouped with higher-level jobs and jobs within a formal career ladder should not be combined into the same job group; and,
- e. Each job group should be large enough to facilitate meaningful statistical analyses.

## 2. EEO Categories Used for Job Group Formation

The seven broad occupational EEO categories shown below were used as a starting point for subdividing 1,103 active job titles into job groups for the purpose of the annual AAP.

### a. EEO Category 1: Executive, Administrative and Managerial

All persons whose primary responsibilities include administration and management of a university-level office, division, college, department or center. It is assumed assignments in this category customarily and regularly require the exercise of discretion and independent judgment and the authority to direct the work of others. This category includes such titles as president, director, vice president, provost, associate dean and manager.

### b. EEO Category 2: Faculty

All persons whose specific assignments are conducting instruction, research, or public service as a principal activity (or activities), and who

hold academic titles of professor, associate professor, assistant professor, instructor, lecturer, or the equivalent of any one of these categories. Due to the unique nature of recruitment, selection and advancement for faculty at an institution of higher education, the titles falling within the EEO category for faculty have been subdivided into job groups specific to the college disciplines.

c. EEO Category 3: Professional Non-Faculty

All persons whose assignments require either college education or experience of such a kind and amount as to provide a comparable background within the group. This category includes employees with assignments requiring specialized professional training and such titles as manager, senior professional, supervisor and coordinator.

d. EEO Category 4: Secretarial and Clerical

All persons whose assignments typically are associated with clerical activities or are specifically of an office or facility administrative support role. This category includes personnel who are responsible for internal and external communications, recording and retrieval of data (other than computer programmers) and/or information and other processes required in an office. Titles such as customer service associate, executive secretary and business assistant are included in this category.

e. EEO Category 5: Technical and Paraprofessional

All persons whose assignments require specialized knowledge or skills that may be acquired through experience or academic work such as offered in many two-year technical institutions, junior colleges or other associate degree programs in higher education. This category includes persons who perform some of the duties of a professional or technician in a supportive role, requiring less formal training and/or experience than is normally required for professional or technical status. This category includes titles such as computer technician, scientific assistant, technical illustrator and technician.

f. EEO Category 6: Skilled Crafts

All persons whose assignments typically require special manual skills and a thorough and comprehensive knowledge of the processes involved in the work, acquired through on-the-job training and experience or through apprenticeship or other formal training programs. This category includes such titles as mechanic, electrician, skilled machinist, carpenter, artist and press operator.

g. EEO Category 7: Service and Maintenance

All persons whose assignments require limited degrees of previously acquired skills and knowledge and in which workers perform duties that result in or contribute to the comfort, convenience and hygiene of personnel and the student body or that contribute to the upkeep and care of buildings, facilities or grounds of the institutional property. This category includes such titles as laundry worker, cafeteria worker, bus driver, garage worker, custodial personnel, gardener, refuse collector, construction worker and security personnel.

D. Analyses for Annual Affirmative Action Program

1. Organizational Profile – Workforce Analysis

In accordance with C.F.R. § 60-2.11 (c), Texas A&M has prepared an Organizational Profile in the form of a workforce analysis. The workforce analysis is arranged by departments, as identified by their assigned administrative locations (ADLOCS), for which there were active employees as of October 31, 2008. As of that date, there were 8,643 budgeted employees in 196 departments by ADLOC; this represents an increase of 379 employees over the previous year's analysis.

The workforce analysis lists job titles as they appeared in the BPP records ranked from the lowest paid to the highest paid within each department. The annual wage or salary range is provided for each title, and all titles within the department are shown, including supervisory and manager titles.

The workforce analysis indicates the employment data for each department. For each job title, the following is provided: total number of incumbents, the salary range of the incumbents in the title, the total number of minorities, the total number of male and female incumbents, and the total number of male and female incumbents in each of the following groups: Blacks, Hispanics, Asians/Pacific Islanders and American Indians/Alaskan Natives. Texas A&M employees who work at the campus in Doha, Qatar and report to the President were included in the analysis. The workforce analysis is maintained in a separate volume in Human Resources.

2. Job Group Analysis

In accordance with 41 C.F.R. § 60-2.12, Texas A&M has prepared a job group analysis that combines titles into job groups based on similarity of content, wage rates and opportunities. Similarity of content refers to the duties and responsibilities of the job titles within the job group. Similarity of opportunities refers to training, transfers, promotions, tenure, pay, mobility, and other career enhancement opportunities offered by jobs within the job group. The university has considered the size of its workforce and the structure of its compensation system when evaluating the degree of similarity in wage rates appropriate for job

group formation. The job groups have also been formed to allow for a structured mobility process for established university-wide career ladders.

For affirmative action reporting purposes, Texas A&M has grouped job titles into job groups structured within the EEO broad occupational categories defined in section IV. C. 2 above.

The job group analysis lists titles for which there are incumbent employees assigned to each job group, including supervisory and manager titles, and the annual wage or salary range for each job group. The job group analysis is maintained in a separate volume in Human Resources.

3. Placement of Incumbents in Job Groups

Pursuant to 41 C.F.R. § 60-2.13, Texas A&M has separately stated the number and percentage of women and minorities employed in each job group. A table displaying these percentages in each job group is maintained in a separate volume in Human Resources.

4. Availability/Representation Analysis

Using the Availability Factor Computation Method pursuant to 41 C.F.R. § 60-2.14, Texas A&M has estimated the availability of women and minorities for each job group.

a. Consideration of Availability Factors

In determining availability of women and minorities, the university considered two factors based on historical recruitment data:

- 1) The percentage of women or minorities with requisite skills in the reasonable recruitment area; and,
- 2) The percentage of women and minorities among those promotable, transferable and trainable within the university.

b. Determination of Reasonable Recruitment Area

In accordance with 41 C.F.R. § 60-2.14 (c), Texas A&M has identified the recruitment area for each job group and considered additional possible recruitment areas. Based on that consideration, the university determined the area from which the university reasonably can seek qualified workers with the requisite skills to fill positions in a particular job group. The university has assured that its reasonable recruitment areas are not drawn in such a way as to have the effect of excluding women or minorities.

The reasonable recruitment areas identified for affirmative action

purposes include the local Bryan and College Station Metropolitan Statistical Area, the state of Texas and the United States. The reasonable recruitment areas are contained in a separate volume maintained in Human Resources.

c. Determination of Feeder Job Pools

Pursuant to 41 C.F.R. § 60-2.14 (c) (2) and (f), and based on patterns of promotion and transfer and career ladder mobility, Texas A&M has identified the job groups which are the “feeder pools” for each job group. Such feeder pools include those employees who are reasonably promotable, transferable and trainable. The university has not defined these feeder pools in such a way as to have the effect of excluding minorities or women. The titles included in these feeder pools are contained in a separate volume in Human Resources.

d. Requisite Skill Census Data

Pursuant to 41 C.F.R. § 60-2.14 (d), Texas A&M used the 2000 U.S. Census EEO Special File, which contains data on 472 individual occupational classification categories when determining the percentage of women and minorities with requisite skills in the reasonable recruitment area. The university identified every job title in the organization with the associated occupational classification in the EEO Special File. Additional availability data were derived from recent doctoral degrees awarded and other sources identified by the office of Dean of Faculties and Associate Provost for the percentage of women and minorities in the various academic disciplines and job groups. The relevant statistical data used for the university’s job groups are contained in a separate volume maintained in Human Resources.

e. Requisite Skill Data and Composite Availability

Pursuant to 41 C.F.R. § 60-2.14 (g), Texas A&M has separately determined the availability of women and minorities for each job group using the reports identified above. The university has determined the composite availability for a job group by weighting the availability for each job title by the proportion of job group incumbents employed in that job group and adding the weighted availability estimates for all job titles in the job group.

f. Calculating Final Availability

Texas A&M University has reviewed historical patterns of hiring and promotion/transfer into each job group and has determined the proportion of employees within a job group who entered the job group directly by hire from outside the university and the proportion that entered the job group in question by promotion or transfer from within the university. These

assigned weights were determined by examining the past year's hiring statistics per job group. Statistics will be monitored annually and adjusted as needed to reflect changes in demographics and hiring patterns. By multiplying the weight for each factor times the availability for that factor, the university determined a final availability estimate for each job group.

The final availability estimates for each job group are indicated on the availability analysis worksheets contained in a separate volume maintained in Human Resources.

5. Comparing Incumbency to Availability

Pursuant to 41 C.F.R. § 60-2.15, Texas A&M has compared the percentage of minorities and women in each job group with the availability estimates for those job groups. Pursuant to OFCCP Supplementary Information, Section-by-Section Analysis of Comments and Revision § 60-2.15, 165 Fed. Reg. 68021, 68033-68034, the university has used a two standard deviation test of statistical significance to determine whether the percentage of women or minorities in a job group was less than would be reasonably expected given their availability percentage for that particular job group. The comparison of incumbency to availability analysis is contained in a separate volume maintained in Human Resources.

6. Annual Placement Goals

Pursuant to 41 C.F.R. § 60-2.16, where Texas A&M has determined the percentage of women or minorities employed in a particular job group is less than reasonably would be expected given their availability for employment in that particular job group, the university has established an Annual Placement Goal equal to the availability percentage for women or minorities, as appropriate, for the job group.

Annual Placement Goals apply to movement into a job group, whether from new hires or from promotion or transfer from another job group. Texas A&M will make a good faith effort to attain its Annual Placement Goals through implementation of action-oriented recruitment and outreach programs.

In accordance with 41 C.F.R. § 60-2.16, the following principles apply to Annual Placement Goals:

- a. Annual Placement Goals are not rigid or inflexible quotas which must be met;
- b. Annual Placement Goals do not set a ceiling or a floor for the employment of particular groups;
- c. Annual Placement Goals do not justify and will not be used to extend a preference to any person, select a person, or adversely affect any

person's employment status on the basis of that person's race, sex, color, national origin, religion or age;

- d. Annual Placement Goals do not create set-asides for specific groups and are not intended to achieve proportional representation or equal results; and,
- e. Annual Placement Goals will not be used to supersede merit selection principles and do not require or justify the hiring or promotion of a less qualified person in preference to a more qualified person.

The comparison of incumbency to availability analysis and Annual Placement Goals are contained in a separate volume maintained in Human Resources.

#### 7. Disparity Analyses

- a. Texas A&M reviews job vacancy specifications submitted by supervisors and hiring managers when initiating the employment process. The specifications are reviewed to assure they are not discriminatory with regard to race, sex, color, national origin, religion, age, disability or veteran status.
- b. Texas A&M monitors the hiring process activity from the initial posting of the vacancy to the selection of the applicant for hiring. This procedure involves the use of Texas A&M Online Employment Services data or other applicant flow data, as well as collaboration with the hiring manager or other department representative responsible for the hiring process. When needed, Human Resources or the Dean of Faculties and Associate Provost will recommend actions to assure that no person is discriminated against in the hiring process.
- c. Analyses of new hires and terminations are prepared to determine if there is a disparate impact in the selection or retention of employees, and are reviewed with executive management as necessary.

### V. IDENTIFICATION OF PROBLEMS AREAS

Pursuant to 41 C.F.R. § 60–2.17 (b), Texas A&M has performed an assessment of measurable aspects of the classification, compensation, recruitment and employment, and other practices in the workforce by organization and by job group. Statistical data and reports are contained in a separate volume maintained in Human Resources.

#### A. Analyses of Workforce

##### 1. Workforce by Organizational Unit

Texas A&M has reviewed the workforce by organizational unit, as set forth in the Workforce Analysis, to determine if problems exist for women or minorities in employment practices in any organizational unit or distribution in different jobs within any organizational unit. Texas A&M found no significant problems.



2. Workforce by Job Group

Texas A&M has reviewed the workforce by job group to determine if problems exist for women or minorities in employment practices within any job group. Texas A&M found no significant problems. For job groups in which it was determined that the percentage of women or minorities employed are statistically less than would reasonably be expected given their availability for employment in the particular job group, the university has established Annual Placement Goals.

The establishment of an Annual Placement Goal does not amount to an admission of impermissible conduct. It is neither a finding of discrimination nor a finding of a lack of good faith affirmative action efforts. Rather, the establishment of an Annual Placement Goal is designed to be a technical targeting term used exclusively by affirmative action planners who seek to apply good faith efforts to increase in the future the percentage employment of women and minorities in the workforce.

B. Analyses of Classification and Compensation

1. Analysis of Position Descriptions

Texas A&M has reviewed requested non-faculty job classification actions and associated compensation actions to assure that positions with the same title are comparable in terms of essential job content, required educational level and necessary experience criteria to perform the essential duties of the job. Texas A&M found no significant problems.

2. Analysis of Compensation

Texas A&M has reviewed compensation policies and practices regarding starting pay, wage and salary ranges, merit and promotional pay increases and has found no significant problems.

C. Analyses of Recruitment and Employment

1. Analysis of Applicant Flow by Job Group

Texas A&M has performed a statistical comparison of the women and minority composition of candidates selected and of applicants recruited, referred, interviewed and selected in each job title and has found no significant disparities.

2. Analysis of Selection, Recruitment, Referral and Other Personnel Procedures

Texas A&M has reviewed the applicant flow data for filled vacancies from the point of application to referral, interview and selection for the women and minority composition of applicants and new hires and has found no significant disparities reflecting inappropriate recruitment or selection.



3. Analysis of Hiring Procedures

Texas A&M has reviewed its recruitment, referral, selection and other hiring procedures to determine whether they result in disparities in the employment or advancement of women or minorities. Employment practices were reviewed with regard to the use of external recruiting sources and search firms, the posting of job openings and the postings with the Texas Workforce Commission. Texas A&M found no significant impediments to equal employment opportunity in any of these areas.

4. Analysis of Promotions

Texas A&M does not perform a statistical analysis on promotions since vacant non-faculty positions are filled by posting and advertising the positions in a competitive process and is analyzed with applicant and new hire data. Faculty promotions are based on the individual attaining the required qualifications and there are no promotional pools to consider.

5. Analysis of Terminations by Job Title

Texas A&M does not perform a statistical analysis on terminations unless there is a statistically significant reduction-in-force event. No statistically significant reductions in force occurred during 2008. All reduction-in-force procedures are monitored by Policy & Practice Review and coordinated with Human Resources. All other terminations are voluntary by an employee or involuntary based on employee performance deficits or inappropriate or illegal activities. No pools of employees are involved in these terminations.

6. Texas A&M has reviewed its employment practices for any other obstacles to achieving equal employment opportunity and affirmative action objectives and has found no significant problems.

D. Other Analyses

Texas A&M will review various other employment issues, including facilities, university-sponsored recreational and social events, seniority practices and provisions, training programs and workforce attitude. No significant problems have been identified.

## VI. ACTION-ORIENTED PROGRAMS

Pursuant to 41 C.F.R. § 60–2.17(c), Texas A&M has established an action-oriented plan to achieve its Annual Placement Goals through ongoing recruitment programs and activities and training. The Texas A&M University System Regulation 33.99.01, *Employment Practices* and Texas A&M Rule 33.99.01.M1, *Hiring Rules for Non-Faculty Positions* outlines the regulations and rules for recruitment and selection procedures.

A. Recruitment Programs and Activities

1. Programs for Applicants and Employees

- a. The APP is posted on the Human Resources web site and in print at the Sterling C. Evans Library. The AAP is further disseminated internally and externally to maximize its effectiveness.
- b. The Equal Employment Opportunity / Affirmative Action statement, "Texas A&M University is an equal opportunity, affirmative action employer committed to diversity" is incorporated into all employment and recruitment materials.
- c. Job vacancies for non-faculty positions below the level of Vice President are posted on the Texas A&M Online Employment Services web site by Human Resources for a minimum of five working days. Non-faculty vacancies are also posted with the Texas Workforce Commission on their "Work In Texas" web site and the national web site "America's Job Bank". An applicant, including current employees, may apply for posted vacant positions by submitting an application, responding to job-related questions, and submitting the application to the posted vacancy.
- d. Computers are available at Human Resources for applicants to use at no cost during normal business hours to allow them to apply online for posted vacancies or access any other Texas A&M web site. Human Resources has bilingual staff available to assist Spanish-speaking applicants as requested.
- e. Human Resources has established contracts with online recruiting companies for advertising vacancies in faculty, non-faculty and research positions. Hiring departments may advertise vacancies at no charge on the web sites "HigherEdJobs.com" and "Workplacediversity.com", and at a discounted price on the web site of the Chronicle of Higher Education.
- f. Vacancies in non-faculty job titles in job groups for which there is an Annual Placement Goal are advertised by Human Resources on the web sites "HigherEdJobs.com" and "Workplacediversity.com" at no cost to the hiring department. Additionally, hiring departments may elect to advertise the particular vacancy at a discounted price on the web site of the Chronicle of Higher Education or other identified web sites specializing in diversity recruitment.
- g. Human Resources attends Bryan/College Station Chamber of Commerce job fairs and participates in other community-based job fairs and high school career programs.
- h. Applicants are asked to identify if they are members of a protected class. Submission of this information is voluntary, and refusal to provide it will

not subject the applicant to discriminatory treatment.

- i. Voluntary demographic information, such as race, sex, veteran status, etc., is collected from all applicants for non-faculty positions by Human Resources and for faculty positions by the Dean of Faculties and Associate Provost. Hiring managers have access to the composition of their applicant pool by race and sex without viewing the individual applicant data. Hiring managers may also view the Annual Placement Goals, if any, associated with the job group for that vacant position title.
- j. Search firms used for identification of applicants are required to include women and minority candidates in referrals on a non-discriminatory basis. Demographic information is gathered on all applicants and captured for affirmative action reporting purposes.
- k. Exit survey responses are solicited from budgeted non-faculty terminating employees. Human Resources evaluates the responses to determine if there are any significant barriers or problem areas that should be addressed in accordance with the AAP.
- l. An assistance program is available to partners of new faculty and key administrative staff employees to identify opportunities for the partner to also have a career at Texas A&M. The Texas A&M Dual Career Service is coordinated by Human Resources in conjunction with the Dean of Faculties and Associate Provost to facilitate the placement of spouses or significant others accompanying new faculty or key administrative staff.
- m. A network of university employees designated to perform critical human resources and payroll functions at the departmental level, called Human Resources Liaisons, are trained in employment policies and procedures and facilitate compliance at the department level for recruitment and hiring processes.

## 2. Programs for Faculty Employees

- a. The Dean of Faculties and Associate Provost, in collaboration with the Vice President and Associate Provost for Diversity, has developed recruiting guidelines called "Recruitment and Retention for Faculty Diversity: A Handbook for Search Committees". It provides affirmative action and diversity information for faculty recruitment efforts and is available online at the Dean of Faculties and Associate Provost web site.
- b. The Dean of Faculties and Associate Provost, at the invitation or request of faculty and administrators, facilitates conversations at the department and college level on effective strategies for the recruitment and retention of women and minority faculty.
- c. The Dean of Faculties and Associate Provost holds confidential

consultations with and exit interviews for all faculty, including women and minority faculty.

- d. The Dean of Faculties and Associate Provost reviews all decisions relating to the recruitment and search for faculty positions and may approve the final selection of new faculty employees.
- e. The Dean of Faculties and Associate Provost maintains a personnel information database on all faculty employees and applicants to faculty titles. This database is used to monitor hiring practices for faculty positions, including women and minorities.
- f. The deans of each college monitor the appropriateness of the applicant pool diversity for faculty positions prior to choosing candidates for on-site interviews from the pool.
- g. The President, Executive Vice President and Provost, and the Dean of Faculties and Associate Provost monitor the demographics of the offers being made to faculty to assess if the processes in place show effectiveness in attracting and recruiting diverse faculty.

## B. Training Programs

- 1. The department of Employee & Organizational Development, in collaboration with subject matter experts within Human Resources, provides the following training programs in support of the AAP. These programs and classes are available at no cost to employees or departments.
  - a. Training for employees on how to write resumes, cover letters and other application materials.
  - b. Training for hiring managers on all aspects of the recruitment and selection process, including using the Texas A&M Online Employment Services system, search committees, evaluation of applicants, interviews, reference verifications and strategies to increase diversity in the applicant pool.
  - c. Training for Human Resources Liaisons on the knowledge and skills to assist departments with hiring processes and diversity initiatives.
  - d. Online tutorials and hiring process resources and tools for hiring managers, supervisors, search committees, and Human Resources Liaisons to help assure job searches are conducted in a fair, consistent and non-discriminatory manner and that all phases of the job search are documented.
  - e. Training on Equal Employment Opportunity (EEO) issues, called "Creating a Discrimination-Free Workplace, is mandatory for all State

employees within 30 days of employment. This training is required by all budgeted employees, student employees, part-time employees and seasonal or temporary workers according to Texas Labor Code 21.010. The Code further requires that each employee must retake the EEO training every two years. Human Resources monitors compliance with this requirement.

2. The Dean of Faculties and Associate Provost has developed, or administers, the following training programs in support of equal employment and diversity initiatives. These programs and classes are available at no cost to employees or departments.
  - a. Training to faculty search committees on how to manage the search process, evaluation and ranking process, hosting candidates on campus, initiating the retention process, and fostering a positive climate for diversity.
  - b. An annual orientation program for new faculty and academic department heads during which they have an opportunity to engage with current faculty and university administrators about the recruitment and retention of minority faculty and the value of a diverse faculty at Texas A&M.
  - c. Workshops and seminars designed to meet the professional development needs of faculty, including women and minority faculty, on a regular basis. Information about these workshops is disseminated through the Dean of Faculties and Associate Provost web site.

#### C. Other Initiatives

1. Representatives of Human Resources attend local, regional or national workshops and conferences given by professional organizations with an interest and specialty in equal employment, affirmative action, diversity, discrimination, employment law and related topics in order to gain best-practices and benchmarking data to enhance the organization's AAP.
2. The Vice President and Associate Provost for Diversity takes an active role in supporting and coordinating campus diversity initiatives, maintaining a list of diversity initiatives across the university and hosting periodic networking opportunities with university leadership.
3. The Provost and Executive Vice President for Academics has established a Council on Climate and Diversity to provide counsel to university leadership on all ways of attracting and retaining culturally diverse students, faculty and staff to Texas A&M and to strengthen, sustain and promote diversity efforts.

4. In November 2006, Texas A&M was presented with the U.S. Secretary of Labor's Opportunity Award, awarded annually by the U.S. Department of Labor to federal contractors who represent the highest level of voluntary commitment to equal employment opportunity during the year. Texas A&M was the first university to receive the award since its inception in 1988.

## **VII. INTERNAL MONITORING AND REPORTING SYSTEM**

Pursuant to 41 C.F.R. § 60–2.17(d) Texas A&M periodically measures and reports on the effectiveness of the AAP to assure that the university's policy of non-discrimination is incorporated into all employment practices. The internal review and reporting process is conducted by Human Resources on a periodic basis

### **A Internal Periodic Monitoring**

1. Analysis of Annual Placement Goal Attainment

The university performs a review of the composition of women and minority applicants into a job group with any applicable Annual Placement Goals.

2. Analysis of Applicant Flows and New Hires

The university performs a review of the women and minority composition of applicants recruited, referred, interviewed and selected.

3. Analysis of Terminations

The university performs a review of the women and minority composition of terminated employees and the job groups from which they have been terminated in those instances where terminations occur from involuntary actions that involve a pool of employees such as a reduction-in-force.

4. Analysis of Promotions

University employees are required to apply and compete for vacant university positions; therefore, no separate analyses of promotions are performed.

5. Analysis of Compensation

The university reviews its compensation practices when determining starting pay, salary ranges, merit increases and reclassification increases.

6. Evaluation of Recruiting Services

The university reviews the women and minority composition of applicants as a result of advertisement at external online recruiting web sites to identify the most effective sources for attracting a diverse applicant pool.

B. Internal Reporting and Review

Human Resources reviews on a periodic basis the results of monitoring and associated reports and advises university executives of program effectiveness as necessary, to implement appropriate actions consistent with the university's AAP objectives.