EXECUTIVE ORDER 11246 AFFIRMATIVE ACTION PLAN (AAP)

for

TEXAS A&M UNIVERSITY - COLLEGE STATION

A MEMBER OF
THE TEXAS A&M UNIVERSITY SYSTEM

01/01/2014 - 12/31/2014

PART I: AAP FOR MINORITIES AND WOMEN

PART II: AAP FOR PROTECTED VETERANS
AND INDIVIDUALS WITH DISABILITIES

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INTRODUCTION TO PARTS I AND II

BACKGROUND

TEXAS A&M UNIVERSITY - COLLEGE STATION is a federal government supply and service contractor subject to the affirmative action requirements of Executive Order 11246, the Rehabilitation Act of 1973 as amended, and the Vietnam Veterans' Readjustment Assistance Act of 1974 as amended. Because TEXAS A&M UNIVERSITY - COLLEGE STATION has $50,000 or more in annual contracts with the federal government and employs 50 or more employees, we are required to prepare annual written Affirmative Action Plans (AAP's) for minorities, women, protected veterans, and individuals with disabilities in our organization. Failure to comply with these laws and their implementing regulations, which are enforced by the Office of Federal Contract Compliance Programs (OFCCP), can result in debarment of the University from future contracts and subcontracts.

Affirmative Action is a term that encompasses any measure adopted by an employer to correct or to compensate for past or present discrimination or to prevent discrimination from occurring in the future. Affirmative Action goes beyond the simple termination of a discriminatory practice.

As stipulated in federal regulations, a prerequisite to the development of a satisfactory Affirmative Action Plan is the evaluation of opportunities for protected group members, as well as an identification and analysis of problem areas inherent in their employment. Also, when a statistical analysis of the organization’s workforce reveals a significant disparity between incumbency and availability of minorities, women, protected veterans, and/or individuals with disabilities, an adequate AAP details specific affirmative action steps to guarantee equal employment opportunity. These steps are keyed to the problems and needs of protected group members. For minorities and women, such steps include the development of hiring and promotion goals to rectify the disparity between incumbency and availability. For protected veterans, such steps include a hiring benchmark to assist in assessing the effectiveness of efforts to recruit and employ protected veterans. With regard to individuals with disabilities, steps include the establishment of a seven percent utilization goal to measure the success of outreach and recruitment efforts. It is toward this end that the following AAP of TEXAS A&M UNIVERSITY - COLLEGE STATION was developed.

APPLICABLE AFFIRMATIVE ACTION LAWS AND REGULATIONS

TEXAS A&M UNIVERSITY - COLLEGE STATION's AAP for minorities and women (Part I) has been prepared according to Executive Order No. 11246, as amended, and Title 41, Code of Federal Regulations, Part 60-1 (Equal Employment Opportunity Duties of Government Contractors), Part 60-2 (Affirmative Action Programs of Government Non-Construction Contractors; also known as "Revised Order No. 4"), and Part 60-20 (Sex Discrimination Guidelines for Government Contractors).

TEXAS A&M UNIVERSITY - COLLEGE STATION has developed separately an Affirmative Action Plan for protected veterans and individuals with disabilities (Part II), prepared in accordance with the Rehabilitation Act of 1973, Section 503, as amended; and Title 41, Code of
Federal Regulations, Part 60-741 (Affirmative Action Program for Individuals with Disabilities); the Vietnam Era Veterans' Readjustment Assistance Act (VEVRAA) of 1974, Section 4212, as amended; and Title 41 Code of Federal Regulations, Part 60-250 and/or Part 60-300 (Affirmative Action Program for Protected Veterans).

The Veterans Employment Opportunities Act of 1998 (VEOA), Public Law 105-339, effective October 31, 1998, increased the threshold for coverage under VEVRAA from a contract of $10,000 or more to a contract of $25,000 or more; extended the law’s protections to “other veterans who served on active duty during a war or in a campaign or expedition for which a campaign badge has been authorized;” and provides temporary (up to one year) protection to veterans who do not have a service connected disability, did not see action in a foreign war and did not serve during the Vietnam era.”

The Jobs for Veterans Act (JFVA), Public Law 107-288, effective December 1, 2003, increased the threshold for coverage under 38 U.S.C. §4212 from $25,000 to $100,000; grants VEVRAA protection to those veterans who, while serving on active duty in the Armed Forces, participated in a United States military operation for which an Armed Forces service medal was awarded pursuant to Executive Order 12985 (62 Fed. Reg. 1209); changed the definition of “recently separated veteran” to include “any veteran during the three-year period beginning on the date of such veteran’s discharge or release from active duty;” changed “Special Disabled Veterans” to “Disabled Veterans,” expanding the coverage to conform to 38 U.S.C. § 4211 (3); and, following publication of the final regulations, required contractors to post job listings with their local employment service delivery system.

**PROTECTED GROUPS**

Coverage under affirmative action laws and regulations applies to:

Women and minorities who are recognized as belonging to or identifying with the following race or ethnic groups: Whites/Caucasians, Blacks/African Americans, Hispanics/Latinos, Asians/Pacific Islanders, and American Indians/Alaskan Natives.

Any veteran 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 who was discharged or released from active duty because of a service-connected disability.

Recently separated veterans: any veteran currently within three-years of discharge or release from active duty.

Veterans who received an “Armed Forces Medal.”

Active duty or wartime campaign badge veteran.

An individual with a disability: 1) a person who has a physical or mental impairment that substantially limits one or more major life activities; (2) a person who has a record of
such impairment; or (3) a person who is regarded as having such an impairment.

PROGRAM TERMINOLOGY

"Comparison of incumbency to availability," "deficiency," "problem area," “utilization,” “goal,” and “benchmark” are terms appearing in this AAP that TEXAS A&M UNIVERSITY - COLLEGE STATION is required by federal government regulations to use. The criteria used in relation to these terms are those specified by the government. These terms have no independent legal or factual significance whatsoever. Although TEXAS A&M UNIVERSITY - COLLEGE STATION will use the terms in total good faith in connection with its AAP, such use does not necessarily signify that the University agrees that these terms are properly applied to any particular factual situation and is not an admission of non-compliance with EEO laws, regulations, and objectives.

The comparison of incumbency to availability contained herein is required by government regulations to be based on certain statistical comparisons. Geographic areas and sources of statistics used herein for these comparisons were used in compliance with government regulations, as interpreted by government representatives. The use of certain geographic areas and sources of statistics does not indicate TEXAS A&M UNIVERSITY - COLLEGE STATION's agreement that the geographic areas are appropriate in all instances of use or that the sources of statistics are the most relevant. The use of such geographic areas and statistics may have no significance outside the context of this AAP. Such statistics and geographic areas will be used, however, in total good faith with respect to this AAP.

The grouping of job titles into a given job group does not suggest that TEXAS A&M UNIVERSITY - COLLEGE STATION believes the jobs so grouped are of comparable worth.

Whenever the term "goal" is used, it is expressly intended that it "should not be used to discriminate against any applicant or employee because of race, color, religion, gender, or national origin," as stated in Title 41 Code of Federal Regulations, Part 60-2.16(e)(2).

This AAP is not intended to create any contractual or other rights in any person or entity.

RELIANCE ON EEOC'S GUIDELINES

Although TEXAS A&M UNIVERSITY - COLLEGE STATION does not believe any violation of Title VII of the Civil Rights Act, VEVRAA, or other state or federal civil rights law exists, it has developed this AAP in accordance with and in reliance upon the EEOC's Guidelines on Affirmative Action, Title 29 Code of Federal Regulations, Part 1608.

REPORTING PERIOD

This AAP is designed to cover the following reporting period:

- AAP implementation period: 01/01/2014 – 12/31/2014
- Transaction period: 01/01/2013 – 12/31/2013
STATEMENT OF PURPOSE FOR PARTS I AND II

This AAP has been designed to bring women and men, members of minority groups, protected veterans, and individuals with disabilities into all levels and segments of TEXAS A&M UNIVERSITY - COLLEGE STATION’s workforce in proportion to their representation in the qualified relevant labor market.

The AAP, therefore, is a detailed, results-oriented set of procedures which, when carried out, results in full compliance with equal employment opportunity requirements through the equal treatment of all people.

The manner in which this is to be accomplished becomes technical and somewhat complicated. There are several reasons for this. First, TEXAS A&M UNIVERSITY - COLLEGE STATION is subject to and must address a variety of state and federal laws and guidelines dealing with equal employment opportunity and affirmative action. These guidelines and requirements are in themselves somewhat technical and complex. In addition, relevant court decisions, which are often useful in interpreting but sometimes conflict with these requirements and guidelines, must be taken into account when developing and implementing the AAP. Furthermore, in determining TEXAS A&M UNIVERSITY - COLLEGE STATION’s current equal employment opportunity and affirmative action position and its desired future achievements, numbers, percentages, statistics, and numerous calculations and computations must come into play.

The technical, legal, and mathematical aspects of the AAP, however, all have one common purpose—to allow us to properly identify three key concepts:

1. Where we stand now,
2. Where we must go,
3. How best to get there.

These three concepts are the Affirmative Action Plan.
PART I: AFFIRMATIVE ACTION PLAN FOR MINORITIES AND WOMEN FOR 01/01/2014 - 12/31/2014
# PART I

**AAP FOR MINORITIES AND WOMEN**

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**PART I: AAP FOR MINORITIES AND WOMEN**

**CHAPTER 1: ORGANIZATIONAL PROFILE**

41 C.F.R. § 60-2.11

**Workforce Analysis/Lines of Progression**

TEXAS A&M UNIVERSITY - COLLEGE STATION conducted a workforce analysis to identify employees at COLLEGE STATION by sex and race/ethnicity in each job title. The data was collected from payroll records dated 12/31/2013.

Job titles are listed by organizational unit. Job titles are listed from lowest to highest paid. The list includes all job titles, including departmental supervision, exempt, and nonexempt titles.

For each job title, TEXAS A&M UNIVERSITY - COLLEGE STATION identified the total number of employees, the number of male and female employees, the total number of minority employees, the number of male and female minority employees, the total number of employees who are White, Black, Hispanic, Asian, American Indian or Alaskan Native employees, Native Hawaiian or Pacific Islander, and Two or More races, and the male and female employees within each of these race/ethnic groups.

**Lines of Progression**

Developed in conjunction with the workforce analysis is information on TEXAS A&M UNIVERSITY - COLLEGE STATION's lines of progression. Lines of progression (career ladders/career paths) identify the job titles through which an employee can move to the top of a line. For each line of progression, applicable departments are identified. These are the departments which employ persons in the job titles in the specified line of progression. Some lines of progression are limited to only one department, while others are found throughout several departments.

The lines of progression provide useful information regarding patterns of vertical and horizontal movement throughout our workforce. These patterns will be evaluated to ascertain whether they provide our employees optimum career mobility and opportunities for advancement.

See the *Workforce Analysis/Lines of Progression* for the results per organizational unit.
CHAPTER 2: JOB GROUP ANALYSIS
41 C.F.R. § 60-2.12

Although the workforce analysis was conducted individually for every job title, after it was completed, job titles were grouped for the comparison of incumbency to availability and for setting goals. There were several reasons for grouping jobs.

Many job titles are so similar in content that handling them individually in the AAP is not necessary. Grouping together these very similar titles is appropriate for the comparison of incumbency to availability. For many job titles, the availability data that can be collected is limited, and the same data must be used for several related jobs. Therefore, grouping these related titles together is logical. Also, many job titles have so few incumbents in them that identifying disparities between incumbency and availability by job title is meaningless—as problem areas would be identified in terms of fractions of people. By grouping several similar titles and increasing the number of employees involved, a meaningful comparison can be conducted; any identified problem areas are more likely to be in terms of whole people. Consequently, goals established to address problem areas are also more likely to be in terms of whole people.

The three reasons for grouping job titles all discuss "similar" or "related" jobs. That is the most critical guideline in creating job groups. Above all, the job titles placed into a job group must be more similar or related to each other than the job titles in other job groups.

Job groups should have enough incumbents to permit meaningful comparisons of incumbency to availability and goal setting. Ideally, if a job group is identified as containing a problem area, it should be large enough that a goal of at least one whole person can be established. No minimum size has been established for this purpose, however, since it is dependent not only on the size of the job group, but also on the availability percentage and the number of minorities or women already employed in the job group.

It may not be possible for a smaller contractor's job groups to meet the guideline of not crossing Integrated Postsecondary Education Data System (IPEDS) categories. While there are usually two or more job groups within each IPEDS category, for smaller contractors some or all of their job groups may correspond to IPEDS categories.

TEXAS A&M UNIVERSITY - COLLEGE STATION did not combine job titles with different content, wages, or opportunities if doing so would have obscured problem areas (e.g., job groups which combine jobs in which minorities or women are concentrated with jobs in which they are underrepresented).
CHAPTER 3: PLACEMENT OF INCUMBENTS IN JOB GROUPS
41 C.F.R. § 60-2.13

Each job group appears on a Job Group Report with a name and number. The report lists each job title in the job group. For each job title, the worksheet provides the following information: IPEDS reporting category, job title, employee headcounts for each job title, and overall percentages by sex and race/ethnicity as of 12/31/2013.

See the Job Group Analysis for the listing of the job titles and the associated race and sex headcounts per job group.
"Availability" is an estimate of the proportion of each sex and race/ethnic group available and qualified for employment at TEXAS A&M UNIVERSITY - COLLEGE STATION for a given job group in the relevant labor market during the life of the AAP. Availability indicates the approximate level at which each race/ethnic and sex group could reasonably be expected to be represented in a job group if TEXAS A&M UNIVERSITY - COLLEGE STATION's employment decisions are being made without regard to sex, race, or ethnic origin. Availability estimates, therefore, are a way of translating equal employment opportunity into concrete numerical terms. Correct comparisons of incumbency to availability, worthwhile and attainable goals, and real increases in employment for protected groups depend on competent and accurate availability analyses. With valid availability data, we can compare the percentages of those who could reasonably be expected to be employed versus our current employment (from the workforce analysis), identify problem areas or areas of deficiency, and establish goals to correct the problems.

### Steps in Comparison of Incumbency to Availability

#### Identify Availability Factors

The following availability factors are required of federal government contractors for consideration when developing availability estimates for each job group:

1. **External Factor**: The external requisite skills data comes from the 2006-2010 EEO Tabulation from the U.S. Census Bureau’s American Community Survey.
   - a. Local labor area: See the [Zip Code Analysis](#) report for the counties included in the local labor area
   - b. Reasonable labor area: Texas
   - c. Reasonable labor area: National

   Note: Zip code analysis results only apply to job groups where populated census data is available.

2. **Internal Factor**: The percentage of minorities or women among those promotable, transferable, and trainable within the contractor’s organization. See the [Internal Availability Analysis](#) for more detail.

Assign Internal and External Factor Weights: Weights were assigned to each factor for each job group. A combination of historical data and experience were used to determine the weights. Weights were never assigned in an effort to hide or reduce problem areas.

Identify Final Availability: Weights were multiplied by the component-specific data to produce weighted data for each component. Weighted data for each component was summed. This produced a final availability estimate for each sex and race/ethnic group, as well as for minorities in the aggregate.
See the *Availability Analysis* for the availability breakdown for each job group.
CHAPTER 5: COMPARING INCUMBENCY TO AVAILABILITY
41 C.F.R. § 60-2.15

Once final availability estimates were made for each job group, TEXAS A&M UNIVERSITY - COLLEGE STATION compared the percentage of incumbents in each job group to their corresponding availability. A comparison was then made between the percentage employed as of 12/31/2013 and that group's final availability.

See the *Comparison of Incumbency to Availability* for the results per job group.
TEXAS A&M UNIVERSITY - COLLEGE STATION has established a percentage annual placement goal whenever it found that minority or female representation within a job group was less than would reasonably be expected given their availability. In each case, the goal was set at the availability figure derived for women and/or minorities, as appropriate for that job group. These goals take into account the availability of basically qualified persons in the relevant labor area. They also take into account anticipated employment opportunities with our organization. TEXAS A&M UNIVERSITY - COLLEGE STATION believes these goals are attainable. These goals will be reached primarily through recruiting and advertising to increase the pool of qualified minority and female applicants and through implementation of our action-oriented programs (see Chapter 9). Selections will occur only from among qualified applicants. Goals do not require the hiring of persons when there are no vacancies or the hiring of a person who is less likely to do well on the job ("less qualified") over a person more likely to do well on the job ("better qualified"), under valid selection procedures. Goals do not require that TEXAS A&M UNIVERSITY - COLLEGE STATION hire a specified number of minorities or women.

Goals are not rigid and inflexible quotas which must be met, but are instead targets reasonably attainable by means of applying every good faith effort to make all aspects of the entire AAP work. A goal is a guidepost against which TEXAS A&M UNIVERSITY - COLLEGE STATION, a community group, or a compliance agency can measure progress in remedying identified deficiencies in TEXAS A&M UNIVERSITY - COLLEGE STATION's workforce. By setting realistic goals, based on expected vacancies and anticipated availability of skills within the relevant labor area, and using a job-related selection system, TEXAS A&M UNIVERSITY - COLLEGE STATION should be able to meet the goals, assuming we conduct effective recruitment and advertising efforts to ensure an adequate pool of qualified minority and/or female qualified applicants from which to make selections.

In establishing goals, TEXAS A&M UNIVERSITY - COLLEGE STATION considered the results which could reasonably be expected from putting forth every good faith effort to make our overall AAP work. We involved human resources staff, department heads, and unit managers and supervisors in the goal-setting process. Goals were not established that would exclude any sex or race/ethnic group.

See the Placement Goals report for each job group and the Goals Progress Report for progress made since the previous AAP.
CHAPTER 7: DESIGNATION OF RESPONSIBILITY
41 C.F.R. § 60-2.17(a)

The President assumes the overall responsibility for the implementation of Texas A&M University – College Station AAP. The President has designated the AAO Officer with authority and responsibility for the overall equal employment opportunity and affirmative action administration university wide.

A. Duties of the AAO Officer

The duties of the AAO Officer include:

1. Coordinates the development of policy statements, affirmative action programs, and both internal and external communication programs.

2. Monitors the consistency and completeness of Texas A&M-College Station’s Affirmative Action Program with federal, state, and local agencies' rules and regulations.

3. Serves as a liaison between Texas A&M - College Station and The Texas A&M University System’s Office of Equal Opportunity and Diversity, minority and women's organizations, and other community groups serving women and minorities and the citizens of the State of Texas.

4. Disseminates current legal information affecting affirmative action to appropriate personnel.

5. Assists hiring supervisors in collecting and analyzing employment data and identifying problem areas.

6. Ensures the maintenance of records regarding recruitment, employment, and retention of women and minorities as well as ensuring that Texas A&M-College Station maintains required applicant flow data.

7. Periodically reviews Texas A&M- College Station’s personnel policies and practices in an effort to identify possible problem areas and to develop and suggest solutions for hiring supervisors.

8. Investigates charges of discrimination filed by Texas A&M - College Station employees or applicants for employment with Texas A&M - College Station.

9. Ensures the equal opportunity and affirmative action policy is posted internally.
B. **Duties of Department Directors, Managers, and Supervisors:**

The Department Directors, Managers, and Supervisors have the responsibility of applying the principle of equality in all personnel actions. Their duties include:

1. Applying the principles of equal employment opportunity in all terms and conditions of employment.

2. Reviewing the qualifications of all employees to ensure minorities and women are given full opportunity for transfers and promotions.

3. Taking action to prevent harassment of employees due to race, color, religion, sex, national origin, age, genetic information, disability, or veteran status.

4. Properly displaying posters and notices.

5. Ensuring that minority and female employees are afforded full employment opportunities and are encouraged to participate in all university(or agency)-sponsored educational and training activities.

6. Ensuring that their department or division fully complies with the spirit and policies of the affirmative action program.

7. Ensuring that no one in their department or division harasses employees, retaliates against employees for using the complaint and appeal procedures, and retaliates against employees for filing a complaint with a federal, state, or local compliance agency.

8. Being accountable to senior management for personal support of Texas A&M - College Station equal opportunity and affirmative action policies.
CHAPTER 8: IDENTIFICATION OF PROBLEM AREAS
41 C.F.R. § 60-2.17(b)

Terminology

The phrases “comparison of incumbency to availability” and “problem area” appearing in this chapter are terms TEXAS A&M UNIVERSITY - COLLEGE STATION is required by government regulations to use. The criteria used in relation to these terms are those specified by the government. These terms have no independent legal or factual significance. Although TEXAS A&M UNIVERSITY - COLLEGE STATION will use the terms in good faith in connection with its AAP, such use does not necessarily signify the University agrees that these terms are properly applied to any particular factual situation and is not an admission of non-compliance with EEO laws, regulations, and objectives. Whenever the term “goal” is used, it is expressly intended that it “does not provide the contractor with a justification to extend a preference to any individual’s employment status, on the basis of that person’s race, color, religion, sex, or national origin” (Title 41 Code of Federal Regulations 60-2.16).

In addition to comparing incumbency to availability within job groups, TEXAS A&M UNIVERSITY - COLLEGE STATION has conducted studies to identify problem areas in each of its selection procedures (i.e., hires, promotions, and terminations). TEXAS A&M UNIVERSITY - COLLEGE STATION will continue to monitor and update these studies during each AAP year. In each case where potential problem areas have been identified, affirmative actions, as appropriate, will be taken consistent with any of the action-oriented programs described in Chapter 9 of this AAP.

Goals are established within each of the job groups at the current availability for the job group.

Background: TEXAS A&M UNIVERSITY-COLLEGE STATION continues to experience significant challenges due to administrative efficiency reviews and consulting initiatives related to HR services, staff titles and compensation programs. Reviews have been underway to consider consolidation of HR administration among System Members in the geographic area, with final recommendations and implementation plans pending. A new entity was acquired, the Texas A&M College of Law, in August 2013. In addition, several key executive leadership positions became vacant and some University reorganization occurred with the merging of two major administrative divisions.

41 C.F.R. § 60-2.17(b)(1): Workforce by Organizational Unit and Job Group

An analysis of minority and female distribution within each organizational unit was accomplished by a thorough review of the Workforce Analysis.

An analysis of minority and female utilization within each job group was accomplished by a thorough review of the Comparison of Incumbency to Availability reports.
41 C.F.R. § 60-2.17(b)(2): Personnel Activity

Applicant flow, hires, promotions, and terminations were analyzed by job group. An analysis of selection disparities in personnel activity between men/women and whites/minorities was accomplished by a thorough examination of transaction data. See the Summary of Personnel Transactions Report for each job group.

41 C.F.R. § 60-2.17(b)(3): Compensation Systems

Compensation analyses were conducted by comparing the salaries for men v. women, and whites v. minorities in each job title.
CHAPTER 9: ACTION-ORIENTED PROGRAMS
41 C.F.R. § 60-2.17(c)

TEXAS A&M UNIVERSITY - COLLEGE STATION tailors its action-oriented programs each year to ensure they are specific to the problem(s) identified.

Action-Oriented Programs:

The Action-Oriented Programs designed to address the underutilization of women and minorities are listed below. These Action-Oriented Programs will be implemented throughout the AAP year. The Interim Associate Vice President of Human Resources and Administrative Services, with the help of campus departments and hiring authorities, will be responsible in ensuring that the following are implemented.

Recruitment:

1. TEXAS A&M UNIVERSITY - COLLEGE STATION will place advertisements of job opportunities through the TEXAS A&M UNIVERSITY – COLLEGE STATION online jobs site and the Texas A&M University System websites. Vacancy announcements are provided to the state job listing employment service, the Texas Workforce Commission (TWC).

2. TEXAS A&M UNIVERSITY - COLLEGE STATION will place job opportunity announcements in local, regional, and/or national newspapers when appropriate.

3. TEXAS A&M UNIVERSITY - COLLEGE STATION will include advertisements on various online job sites for campus recruiting, including sites with a focus on recruitment from particular groups such as veterans or the disabled. Listings are included on HigherEdJobs.com., the Higher Education Recruitment Consortium, GettingHired.com and RecruitMilitary.com. If the position has a placement goal it is also listed in WorkplaceDiversity.com.

4. Advertisements and newsletters will include the Equal Employment Opportunity clause.

5. Minority and female applicants will be considered for all positions for which they are qualified.

6. TEXAS A&M UNIVERSITY - COLLEGE STATION will participate in job fairs if there are sufficient numbers of openings to warrant participation. TEXAS A&M UNIVERSITY - COLLEGE STATION will continue to participate in annual job fairs in the local community.

7. Annual placement goals for applicant pools are communicated to the Hiring Supervisor upon posting a position within a job group that has an annual goal. Positions with placement goals are automatically listed in WorkplaceDiversity.com and hiring managers
are encouraged to proactively recruit and advertise to increase the pool of qualified minority and female applicants.

8. The Campaign for Disability Employment was supported and highlighted to the university community through email communications, the Human Resources website and distribution of campaign posters. This campaign seeks to promote positive employment outcomes for people with disabilities by encouraging employers to recognize the value and talent that people with disabilities bring to the workplace.

9. The University will continue to employ work-study students during the summer and part-time during the school year.

10. TEXAS A&M UNIVERSITY - COLLEGE STATION will continue to publish recruiting materials where minority and female members of the workforce are included, as well as in other literature and online marketing.

**Job Specifications/Selection Process:**

1. Develop job position specifications that accurately reflect position functions and are consistent from one location to another.

2. Develop job position specifications with academic, experience, and skill requirements that do not constitute inadvertent discrimination, and are free from bias with regard to sex, age, race, color, religion, national origin, disability, or veteran status.

3. Approved job position specifications will be made available to all members of management involved in the recruiting, screening, selection, and promotion process. Copies may also be made available to recruiting sources.

4. Provide quantitative evaluation matrix template to ensure applicants are considered equally and fairly and to ensure consistency in interviewing potential employees. The Hiring Supervisor determines the criteria, weighting, and other factors for the matrix template that is specific to the vacant position.

5. TEXAS A&M UNIVERSITY - COLLEGE STATION will continue to use only job position specifications that include job-related criteria.

6. TEXAS A&M UNIVERSITY - COLLEGE STATION will continue to carefully select and counsel all personnel involved in the recruiting, screening, selection, promotion, disciplinary, and related processes to eliminate bias in all personnel actions.

7. The University will assign and monitor completion of a hiring training course, “Effective Hiring Practices”, by managers and supervisors before the job vacancy process begins.

8. The University will monitor completion of a nondiscrimination training course, “Creating a Discrimination-Free Workplace”, by all employees upon hire and every two years
thereafter.

Job Advancement:

1. TEXAS A&M UNIVERSITY - COLLEGE STATION will continue to post or announce job opportunities internally.

2. TEXAS A&M UNIVERSITY – COLLEGE STATION employees are encouraged to apply for positions posted on the TEXAS A&M UNIVERSITY – COLLEGE STATION website that would result in a promotion.

3. Internal training opportunities are offered, and employees are encouraged to participate in professional development programs. A Diversity and Inclusion in the Workplace certificate program was implemented. The goal of this program is to contribute to a positive work climate by helping employees recognize, accept and value differences among co-workers and others in the TEXAS A&M UNIVERSITY – COLLEGE STATION community, thereby increasing their ability to work effectively with others within a diverse environment.

4. All employees are actively encouraged to participate in University-sponsored social and recreational activities.

5. The Office of the Vice President and Associate Provost for Diversity coordinates the Diversity Seminar Series Presentations and all employees are invited to participate.

6. The Office of the Vice President and Associate Provost for Diversity continues to review and update the University Diversity Plan which includes specific action steps with dates for completion. These action steps include required reports from the colleges and divisions regarding the climate within their area, and periodic University-wide climate surveys for faculty, administrators and staff.

7. TEXAS A&M UNIVERSITY - COLLEGE STATION will continue use of a formal employee evaluation program that includes employee development and goal setting opportunities. The performance evaluation is used for annual reviews for all employees.

8. All employees are provided opportunities to participate in professional and personal development training programs through a variety of university offices that can be recorded and monitored through a training management system, TrainTraq, and incorporated into their career development plan.
CHAPTER 10: INTERNAL AUDIT AND REPORTING
41 C.F.R. § 60-2.17(d)

Pursuant to §60-2.17(d), TEXAS A&M UNIVERSITY – COLLEGE STATION has conducted studies to identify problem areas in each of the selection procedures (i.e., hires, promotions, and terminations) within the job groups. A&M -College Station will continue to monitor and update these studies during each AAP year. In each case where potential problem areas have been identified, affirmative actions, as appropriate, will be taken consistent with the action-oriented programs described in Chapter 9 of this AAP. The reporting and monitoring system provides for:

- **Analysis of Annual Placement Goal Attainment:** TEXAS A&M UNIVERSITY – COLLEGE STATION compares the race/ethnicity and sex composition of individuals moving into a job group with applicable Annual Placement Goals for that job group.

- **Analysis of Applicant Flow and New Hires: Pursuant** to §60-2.17(b)(2), TEXAS A&M UNIVERSITY – COLLEGE STATION performs a statistical comparison of the race/ethnicity and sex composition of applicants and new hires by job group.

- **Analysis of Terminations:** Pursuant to §60-2.17(b)(2), TEXAS A&M UNIVERSITY – COLLEGE STATION performs a statistical comparison of the race/ethnicity and sex composition of terminated employees by job groups. Involuntary terminations were compared to those available to be terminated.

- **Analysis of Promotions:** Pursuant to §60-2.17(b)(2), TEXAS A&M UNIVERSITY – COLLEGE STATION performs a statistical comparison of promotions by race/ethnicity and sex by comparing promotions into each job group to the internal availability data for that job group.

- **Analysis of Compensation:** Pursuant to §60-2.17(b)(3), TEXAS A&M UNIVERSITY – COLLEGE STATION performs a compensation analyses by comparing the mean salaries for men v. women and whites v. minorities in each job group. Mean tenure within the organization is also considered as a moderating factor.
PART II: AFFIRMATIVE ACTION PLAN FOR PROTECTED VETERANS AND INDIVIDUALS WITH DISABILITIES

FOR

01/01/2014 - 12/31/2014
## PART II
AAP FOR PROTECTED VETERANS AND INDIVIDUALS WITH DISABILITIES

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It is the policy of TEXAS A&M UNIVERSITY - COLLEGE STATION and my personal commitment that equal employment opportunity be provided in the recruitment, hiring, training, and promotion of protected veterans and individuals with disabilities in all job titles, including the executive level. This policy is fully supported by COLLEGE STATION’s Chief Executive Officer. TEXAS A&M UNIVERSITY - COLLEGE STATION does not and will not discriminate against any applicant or employee because he or she is a protected veteran or because of a physical or mental disability in regard to any position for which the applicant or employee is qualified. In addition, TEXAS A&M UNIVERSITY - COLLEGE STATION is committed to a policy of taking affirmative action to employ and advance in employment qualified protected veterans and individuals with disabilities. Such affirmative action shall apply to all personnel actions, including, but not limited to hiring, upgrading, demotion or transfer, recruitment, recruitment advertising, layoff or termination, rates of pay or other forms of compensation, and selection for training, including apprenticeship and on-the-job training. All employment decisions are based on valid job requirements. TEXAS A&M UNIVERSITY - COLLEGE STATION will make every effort to provide reasonable accommodations for any physical and mental limitations of individuals with disabilities and to disabled veterans.

Employees and applicants will not be subjected to harassment, intimidation, threats, coercion, or discrimination because they have engaged in or may engage in filing a complaint; assisting or participating in an investigation, compliance evaluation, hearing, or other activity related to the administration of federal, state, or local law requiring equal opportunity for individuals with disabilities; opposing any act or practice made unlawful by any federal, state, or local law requiring equal opportunity for individuals with disabilities, or exercising any other right protected by Section 503 of the Rehabilitation Act or its implementing regulations.

I reaffirm this commitment to equal opportunity, access, and affirmative action in an annual communication to all employees, which is also posted on TEXAS A&M UNIVERSITY - COLLEGE STATION’s website. I have delegated day to day implementation of the affirmative action program to Elizabeth Schwartz. An audit and reporting system is in place for implementation of the affirmative action program.

Our obligations in this area stem from not only from adherence to various state and federal regulations, but also from our commitment as an employer in this community to provide job opportunities to protected veterans and individuals with disabilities.

If you have any questions regarding our equal employment opportunity or harassment policies or complaint procedures, you may contact Elizabeth Schwartz at 979-845-0357. The Affirmative Action Plan may be reviewed by making an appointment with Elizabeth Schwartz.

____________________________
(Signature)
Janelle Ramirez, Affirmative Action Officer, 979.862.1723
CHAPTER B: REVIEW OF PERSONNEL PROCESSES
41 C.F.R. §§ 60-300.44(b); 60-741.44(b)

To ensure that all personnel processes are conducted in a job-related manner which provides and promotes equal employment opportunity for all known protected veterans and employees and applicants with disabilities, reviews are periodically made of TEXAS A&M UNIVERSITY - COLLEGE STATION’s selection methods.

1) TEXAS A&M UNIVERSITY - COLLEGE STATION periodically conducts a review of its selection procedures to ensure careful, thorough, and systematic consideration of the qualifications of 1) known protected veteran applicants and employees; and 2) applicants and employees with disabilities.

2) Selection procedures will not stereotype protected veterans or individuals with disabilities.

3) The University Designee, Elizabeth Schwartz, will review all hiring decisions for compliance with this section.
CHAPTER C: PHYSICAL AND MENTAL QUALIFICATIONS
41 C.F.R. §§ 60-300.44(c); 60-741.44(c)

To ensure that all physical and mental qualifications and requirements are job-related and promote equal employment opportunity for known protected veterans and individuals with disabilities, reviews are periodically made of TEXAS A&M UNIVERSITY - COLLEGE STATION’s physical and mental job qualifications and requirements as they relate to employment, training, promotion, and demotion.

TEXAS A&M UNIVERSITY - COLLEGE STATION’s physical and mental job qualification standards are reviewed to ensure do not disqualify individuals with disabilities or disabled veterans except in cases where the standards are job-related and consistent with business necessity. This review is done as position descriptions are created or updated. Any previously reviewed classification will be reviewed again if there is a change in working conditions that affect the job's physical or mental requirements (e.g., new requirements, new equipment, etc.)

The burden of proof to demonstrate the necessity of any qualification requirement which may disqualify a protected veteran or an individual with a disability rests with College Station.

Military records will not be used by College Station to discriminate against any protected veteran.
CHAPTER D: REASONABLE ACCOMMODATION TO PHYSICAL AND MENTAL LIMITATIONS

41 C.F.R §§ 60-300.44(d); 60-741.44(d)

TEXAS A&M UNIVERSITY - COLLEGE STATION will make reasonable accommodations to known physical and mental limitations of otherwise qualified individuals with disabilities disabled veterans unless it can demonstrate that such accommodations would impose an undue hardship on the operation of business. If an individual with a disability or disabled veteran is having significant difficulty performing his or her job and it is reasonable to conclude that the performance problem may be related to the known disability, the appropriate contact will confidentially notify the employee of the performance problem and inquire whether the problem is related to the employee’s disability. If the employee responds affirmatively, the appropriate contact will confidentially inquire whether the employee is in need of a reasonable accommodation.

Employees may also contact the following at any time to formally request an accommodation:

For Staff employees:
Janelle Ramirez
Interim Associate Vice President for Human Resources and Administrative Services
979-862-1723
janelle@tamu.edu

For Faculty:
Dr. Michael Benedik
Dean of Faculties and Associate Provost
979-845-4274
benedik@tamu.edu
CHAPTER E: HARASSMENT
41 C.F.R. §§ 60-300.44(e); 60-741.44(e)

TEXAS A&M UNIVERSITY - COLLEGE STATION developed and implemented a set of procedures to ensure that its employees with disabilities and protected veterans are not harassed because of disability or veteran status. All new employees are required to complete online nondiscrimination training as part of the process for being entered onto payroll and every two years thereafter.
COLLEGE STATION will undertake appropriate outreach and positive recruitment activities that are reasonably designed to effectively recruit qualified individuals with disabilities and protected veterans.

1) COLLEGE STATION’s statement on equal opportunity and affirmative action is communicated to all prospective employees through its inclusion on job postings and the official application for employment.

2) All TEXAS A&M UNIVERSITY - COLLEGE STATION’S job openings will continue to be listed with the Texas Workforce Commission to ensure that all prospective applicants are aware of openings. Only positions that will be filled by internal candidates are exempt from posting requirements.

3) On-site tours and meetings are available as an outreach to interested individuals, veterans’ organizations and representatives, and rehabilitation agencies to familiarize their advisers and job coaches of physical features of the workplace and related job requirements.

4) Additional outreach efforts will be made as needed to meet the benchmarks established for hiring protected veterans and the utilization goals for individuals with disabilities.
CHAPTER G: INTERNAL DISSEMINATION OF POLICY
41 C.F.R. §§ 60-300.44(g); 60-741.44(g)

In order to gain positive support and understanding for the affirmative action program for protected veterans and individuals with disabilities TEXAS A&M UNIVERSITY - COLLEGE STATION will implement or continue to implement the following internal dissemination procedures. The following policies and procedures are designed to foster support and understanding from TEXAS A&M UNIVERSITY - COLLEGE STATION’s executive staff, management, supervisors, and other employees in an effort to encourage all employees to take the necessary actions to aid TEXAS A&M UNIVERSITY - COLLEGE STATION in meeting its obligations.

1) TEXAS A&M UNIVERSITY - COLLEGE STATION’s Chief Executive Officer distributes written communication of reaffirmation of commitment to affirmative action annually to all employees. This memorandum is also available on TEXAS A&M UNIVERSITY - COLLEGE STATION’s website.

2) A&M System Policy 08.01 and Regulation 08.01.01 set forth the system’s commitment to affirmative action compliance.

3) The Affirmative Action plan is available on TEXAS A&M UNIVERSITY – COLLEGE STATION’s website.

4) The University Designee provides the Affirmative Action Officer and appropriate managers and supervisors updates on equal opportunity progress within their relevant departments, divisions, and offices.

5) State and federal EEO posters are placed at all TEXAS A&M UNIVERSITY - COLLEGE STATION’s locations.
TEXAS A&M UNIVERSITY - COLLEGE STATION has developed and currently implements an audit and reporting system that addresses the following:

1) Measures the effectiveness of the affirmative action program.

2) Indicates the need for remedial action.

3) Determines the degree to which objectives have been attained.

4) Determines whether protected veterans have had the opportunity to participate in all UNIVERSITY-sponsored educational, training, recreational, and social activities.

5) Measures compliance with the affirmative action program’s specific obligations.
CHAPTER I: RESPONSIBILITY FOR IMPLEMENTATION

41 C.F.R. §§ 60-300.44(i); 60-741.44(i)

1. The Chief Executive Officer has ultimate responsibility for the success of the affirmative action program. The CEO has delegated specific authority and responsibility for affirmative action to Janelle Ramirez, Interim Associate Vice President for Human Resources & Admin. Services.

2. Managers and supervisors share in the responsibility for implementation.
   a. Individual departments share the administrative responsibilities of day-to-day implementation of the program.
   b. All positions for which external candidates are considered are posted and advertised.

3. The University Designee, Elizabeth Schwartz, is responsible for reviewing staff appointment recommendations for conformity to affirmative action guidelines and equal opportunity requirements.
CHAPTER J: TRAINING
41 C.F.R. §§ 60-300.44(j); 60-741.44(j)

TEXAS A&M UNIVERSITY - COLLEGE STATION trains employees involved in the recruitment, screening, selection, promotion, discipline, and related processes to ensure commitment and application of TEXAS A&M UNIVERSITY - COLLEGE STATION’S affirmative action program are implemented.
CHAPTER K: COMPENSATION
41 C.F.R. §§ 60-300.21(i); 60-741.21(i)

It is the policy of TEXAS A&M UNIVERSITY - COLLEGE STATION that when offering employment or promotions to protected veterans or individuals with disabilities, the amount of compensation offered will not be reduced because of any income based upon a disability-related and/or military service-related pension or other benefit the applicant or employee receives from another source.