UNIVERSITY OF OREGON

AFFIRMATIVE ACTION PLAN
FOR INDIVIDUALS WITH DISABILITIES
AND FOR PROTECTED VETERANS

March 1, 2014 – February 28, 2015

Office of Affirmative Action & Equal Opportunity
677 E. 12th Avenue, Suite 452
5221 University of Oregon
Eugene, OR 97403-5221
Telephone (541) 346-3123
The University of Oregon reaffirms its policy of Equal Employment Opportunity and Affirmative Action. This Affirmative Action Plan (AAP) and policy are expressions of my personal and professional commitment to equal opportunity in employment and education consistent with applicable federal and state laws. This Affirmative Action Plan has my complete authorization and commitment.

Michael R. Gottfredson, President
University of Oregon

Effective Date: March 1, 2014

The University of Oregon is an equal opportunity, affirmative action institution committed to cultural diversity and compliance with the Americans with Disabilities Act. This publication will be made available in accessible formats upon request.
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I. Policy Statement

41 CFR§§ 60-741.44(a) and 60-300.44(a)

It is the policy of the University of Oregon to seek and employ qualified personnel at all locations and facilities, and to provide equal employment opportunities for all applicants and employees in recruiting, hiring, placement, training, compensation and benefits, promotion, transfer and termination. To achieve this, the university will take affirmative action to employ and advance in employment qualified individuals with disabilities, disabled veterans, recently separated veterans, armed forces service medal veterans, and other protected veterans and will administer all personnel actions without regard to disability or protected veteran status and base all such decisions on valid job requirements. The university will ensure that applicants and employees with disabilities and those who are protected veterans are informed of the contents of its policy statement.

The university will make reasonable accommodations for qualified individuals with known disabilities unless doing so would result in an undue hardship. The university prohibits harassment of any individual on the basis of disability or protected veteran status. For information regarding the university’s internal policies for addressing complaints of harassment, please refer to the University of Oregon Office of Affirmative Action and Equal Opportunity (OAAEO) brochure titled “An Overview of Services and Complaint and Grievance Procedures” available on the OAAEO web page.

This policy governs all aspects of employment, including selection, job assignment, compensation, discipline, termination, and access to benefits and training. Any employee with questions or concerns about any type of discrimination in the workplace is encouraged to bring these issues to the attention of their immediate supervisor, the Office of Affirmative Action and Equal Opportunity, or Human Resources. Employees can raise concerns and make reports without fear of reprisal, harassment, intimidation, threats, coercion or discrimination because they: (1) file a complaint; (2) assist or participate in an investigation, compliance evaluation, 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 opportunity; or (4) exercise any other employment right protected by federal, state or local law or their implementing regulations.

The University of Oregon maintains an audit and reporting system to determine overall compliance with its equal employment opportunity mandates and to respond to any specific complaints applicants or employees file with the university’s Equal Employment Opportunity Officer.
II. Internal Dissemination of Policy

41 CFR §§ 60-741.44(g) and 60-300.44(g)

The University of Oregon recognizes that even a strong outreach program will be ineffective without adequate internal support from supervisory and administrative personnel and other university employees. To assure greater employee cooperation and participation in the university’s efforts with respect to individuals with disabilities and protected veterans, the university has developed the following internal procedures to communicate its obligation to engage in affirmative action efforts to employ and advance in employment qualified individuals with disabilities and protected veterans. These procedures are designed to foster understanding, acceptance and support among the university’s senior executives, administrators, supervisors and other employees and to encourage such persons to take the actions necessary for the university to meet its obligations.

1. The university’s equal opportunity policy statement is posted in appropriate locations on campus, including places where employment applications are accepted.

2. The university’s policy and the existence of the Affirmative Action Plan are discussed in new employee orientation meetings and in supervisory training programs.

3. Supervisory and management staff are informed of the university’s AAP for persons with disabilities and protected veterans and are advised how to properly respond to an employee who self-identifies as an individual with a disability or a protected veteran under this Plan.

4. An "Invitation to Self-Identify", addressed to individuals with disabilities and all protected veterans, is posted on the OAAEO web page with a link from the Human Resources web page. Employees are encouraged to update this form at any time.

5. All new employees are provided a self-identification form at the start of their employment with the University of Oregon, inviting them to identify as an individual with a disability or protected veteran, as applicable.

6. The Affirmative Action Plan for Individuals with Disabilities and for Protected Veterans is available for inspection upon request by any employee or applicant during normal business hours in the Office of Affirmative Action and Equal Opportunity.
7. The university’s affirmative action policies and procedures regarding persons with disabilities and protected veterans are included in affirmative action training and reinforcing discussions with university managers and supervisors.

8. The Office of Affirmative Action and Equal Opportunity works closely with Human Resources to ensure understanding of affirmative action and equal opportunity as those apply to individuals with disabilities and protected veterans.

9. In support of the full range of needs of our veteran applicants and employees, the UO Libraries has an extensive online list of resources for veterans who are UO faculty, staff or students. This Veterans Resources web page covers general, education, employment, financial, health, legal and family resources.
III. External Dissemination of Policy, Outreach and Positive Recruitment

41 CFR §§ 60-741.44(f) and 60-300.44(f)

Following are some of the efforts the university has taken to disseminate our policy externally and to attract qualified workers with disabilities and covered veterans.

1. The University of Oregon enlists the assistance and support of recruiting sources that are capable of referring qualified individuals with disabilities and protected veterans for employment opportunities with the university.

2. As required by applicable regulations, the university lists employment opportunities, except executive and top management and those opportunities that we expect to fill from within the university, with WorkSource Oregon, the job service for the State of Oregon, as prescribed by OFCCP regulations. The WorkSource Oregon veterans’ employment representative forwards our openings to veterans who are encouraged to apply to those positions for which they feel qualified.

3. The local WorkSource Oregon representative, Oscar Scott, was invited to the OAAEO offices in 2013 to discuss the services provided by the state employment delivery system, their procedures, and ways in which we can better work together to increase the flow of qualified women, people of color, veterans, and individuals with disabilities as applicants for UO employment.

4. We periodically reaffirm our commitment to diversity in letters to local and regional referral agencies, many of whom serve individuals with disabilities and veterans as well as female and minority constituents. We notify these agencies that we are actively seeking qualified women, minorities, veterans and workers with disabilities and request that they inform potential applicants of our employment opportunities. These letters outline where applicants can go to see all of our openings and how to apply.

5. Newspaper advertisements and other recruiting communications include a statement that the University of Oregon is an “equal opportunity, affirmative action institution” or words to that effect.

6. We regularly attend local hiring events focused on informing veterans and workers with disabilities of employment opportunities at the university. Examples include:

• Hiring our Heroes Veterans Event – a hiring fair and workshop for veterans and other military job seekers that focuses on resume writing, tips for
successfully navigating hiring fairs, military skill translation, and interviewing tips.

- Tapping Fresh Talent – a career expo featuring job seekers with disabilities.
IV. Responsibility for Implementation

41 CFR §§ 60-741.44(i) and 60-300.44(i)

Penelope Daugherty, director of the Office of Affirmative Action & Equal Opportunity, who serves as equal employment opportunity officer, has the full support of top management of the university and is responsible for implementing, monitoring, and administering the Plan.

A. Among other things, the Equal Employment Opportunity Officer will:

- Develop policy statements, affirmative action programs, and internal and external communication techniques, including discussions with managers, supervisors and employees, to ensure the company’s policies are followed.
- Identify problem areas in the implementation of the affirmative action program in conjunction with administrators and management, and develop solutions.
- Maintain an audit and reporting system to monitor the progress of the program.
- Serve as liaison between the university and enforcement agencies, minority, women and/or community action groups, and veteran and disabled service organizations.
- Keep university administrators informed of the latest developments in the affirmative action area.
- Conduct regular discussions with managers, supervisors, and employees to ensure that the university's EEO/AAP policies are being followed.
- Encourage supervisors to arrange for career counseling as requested by known individuals with disabilities and covered veterans.
- Work with university officials to ensure that mechanisms are in place so that supervisors and managers understand that they are accountable for helping the university meet affirmative action goals.
B. Other Officers, Administrators and Supervisors are responsible to implement the Affirmative Action Program within their areas of responsibility. This includes monitoring hiring and promotion practices, identifying problem areas, and taking other action as outlined in this Plan.

C. The Disabilities Issues Advisory Council (DIAC) was established to assist in efforts to ensure access to University programs, services and activities for individuals with disabilities, in compliance with the Americans with Disabilities Act (ADA). This group is comprised of representatives from campus departments that have responsibilities for serving faculty, staff, students and members of the public, including members of those groups with disabilities. DIAC advises on accessibility and other disability-related requests and concerns.
V. Training of Personnel Involved in Selection

41 CFR §§ 60-741.44(j) and 60-300.44(j)

All personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes have been, and will continue to be, informed to ensure that the commitments in the University of Oregon’s Affirmative Action Plan related to the disabled and protected veterans are carried out.
VI. Review of Personnel Processes

41 CFR §§ 60-741.44(b) and 60-300.44(b)

The University of Oregon reviews its employment practices to ensure that personnel processes provide for careful, thorough and systematic consideration of the job qualifications of applicants and employees who are individuals with known disabilities or protected veterans for job vacancies filled either by hiring or promotion and for all training opportunities.

The university also insures that its personnel processes do not stereotype individuals with disabilities or protected veterans in a manner which limits their access to jobs for which they are qualified. The university reviews and makes modifications to its personnel processes as necessary to ensure compliance with applicable requirements. The following procedures facilitate a review of the implementation of these requirements:

1. The university invites those offered jobs and incumbent employees to self-identify as individuals with disabilities or as protected veterans. These self-identification forms are retrievable for review by the Department of Labor and by university officials for use in investigations and internal compliance activities.

2. In each case where an employee or applicant with a disability and/or a protected veteran is rejected for employment or promotion, the university maintains records related to the reason for rejection as well as a description of any accommodations considered if disability was the reason for rejection. The university makes this information available to the applicant or employee concerned upon request.

3. The Office of Affirmation Action and Equal Opportunity keeps records that contain a description of any accommodation which made it possible to place an individual with a disability or a protected veteran on the job.
VII. Review of Physical and Mental Qualifications

41 CFR §§ 60-741.44(c) and 60-300.44(c)

1. The University of Oregon has reviewed the physical and mental qualifications of all its jobs. None have requirements that tend to screen out qualified disabled individuals unless they are job-related and consistent with business necessity and the safe performance of the job.

2. The university will review physical and mental qualifications of a job whenever the job specifications or position description for that job are revised.

3. Prior to posting for a vacancy, all aspects of a job description are reviewed, including physical and mental qualifications.

4. For those positions for which the University of Oregon requires a post-offer, pre-placement physical examination, all entering employees in the same job category are subject to the same examination, regardless of disability. To the extent criteria may tend to screen out applicants with disabilities, the criteria are carefully reviewed to ensure that they are job-related and consistent with business necessity.

5. Information obtained about any applicant or employee’s medical condition or history shall be collected and maintained on separate forms and in separate medical files.

These files will be treated as confidential except:

a. Supervisors and managers may be informed regarding necessary restrictions on the work or duties of the applicant or employee, and regarding reasonable accommodations;

b. First aid and safety personnel may be informed, when appropriate, if the disability might require emergency treatment; and

c. Government officials engaged in enforcing the laws administered by OFCCP or enforcing the Americans with Disabilities Act shall be provided relevant information on request.

Information obtained regarding the medical history or condition of any applicant or employee shall not be used for any purpose inconsistent with the law.
VIII. Reasonable Accommodation to Physical and Mental Limitations

41 CFR §§ 60-741.44(d) and 60-300.44(d)

1. The university will offer reasonable accommodation to the known physical and mental limitations of an otherwise qualified individual with a disability unless it can demonstrate that the accommodation would impose an undue hardship on the operation of its business.

2. If an employee with a known disability 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, such employee’s supervisor 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 university shall confidentially inquire whether the employee is in need of a reasonable accommodation. This does not mean that poor performance will be tolerated; a reasonable accommodation is that which will permit the employee to perform the job in accordance with those standards established by the supervisor for all employees in the same or similar position.

3. Employees may also contact the Office of Affirmative Action and Equal Opportunity at any time to request an accommodation.
   
   OAAEO
   677 East 12th Avenue, Suite 452
   5221 University of Oregon
   Eugene, OR 97403-5221
   
   Office (541) 346-3123
   FAX (541) 346-4168
IX. Harassment

CFR §§ 60-741.44(e) and 60-300.44(e)

The University of Oregon prohibits harassment of employees on account of their status as individuals with disabilities or disabled veterans, recently separated veterans, armed forces service medal veterans, or other protected veterans, within the meaning of these regulations. Any employee who believes he or she has been harassed in violation of this policy is urged to bring the matter to the immediate attention of their supervisor or the Equal Employment Opportunity Officer in the Office of Affirmative Action and Equal Opportunity.

Information regarding the University of Oregon’s internal policies for addressing complaints of harassment is available in the OAAEO’s brochure titled “An Overview of Services and Complaint and Grievance Procedures”, on the OAAEO web page.

Grievance procedures and supervisory responsibility in connection with allegations of discrimination and discriminatory harassment are specifically addressed during the university’s comprehensive supervisor training. It is the commitment of the university that no individual shall be subjected to retaliation for identifying affirmative action problem areas or concerns or participating in any of the university’s discrimination grievance processes.

The investigation of any such complaint shall be carried out promptly and shall involve only those persons with a need to know.

Any employee guilty of harassment of another employee in violation of this policy is subject to discipline up to and including discharge, depending on the severity of the offense.
X. Audit and Reporting System

41 CFR §§ 60-741.44(h) and 60-300.44(h)

An important element in effectively implementing our EEO/AA policies is an adequate internal audit and reporting system. Through the development of this system, we can measure the effectiveness of our Affirmative Action Plans. For this purpose we have developed a system that:

1. Measures the effectiveness of the university’s affirmation action program.
2. Indicates any need for remedial action.
3. Assists in determining the degree to which the university’s objectives are being attained.
4. Assists in determining whether individuals with known disabilities and covered veterans have had the opportunity to participate in all university sponsored educational, training, recreational and social activities.
5. Measures the university’s compliance with the affirmative action program’s specific obligations.