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**UNIVERSITY  
OF OREGON**

**AFFIRMATIVE ACTION PLAN  
FOR PROTECTED VETERANS AND  
INDIVIDUALS WITH DISABILITIES**

**March 1, 2017 – February 28, 2018**

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2017-2018

**UNIVERSITY OF OREGON**

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FOR PROTECTED VETERANS and  
INDIVIDUALS WITH DISABILITIES**

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**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.**



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**Michael H. Schill, President  
University of Oregon**

**Effective Date: March 1, 2017**

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**The University of Oregon is an equal opportunity, affirmative action institution committed to cultural diversity and compliance with the Americans with Disabilities Act. The University encourages all qualified individuals to apply for available employment opportunities.**

UO prohibits discrimination on the basis of race, color, sex, national or ethnic origin, age, religion, marital status, disability, veteran status, sexual orientation, gender identity, and gender expression in all programs, activities and employment practices as required by Title IX, other applicable laws, and policies. Retaliation is prohibited by UO policy. Questions may be referred to the Title IX Coordinator, Office of Affirmative Action and Equal Opportunity, or to the Office for Civil Rights. Contact information, related policies and complaint procedures are available on the [Nondiscrimination Statement](#).

This publication will be made available in accessible formats upon request.

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## Definitions

The following definitions apply in this Affirmative Action Plan.

Disabled Veteran means:

- (1) A veteran of the U.S. military, ground, naval or air force 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
- (2) A person who was discharged or released from active duty because of a service-connected disability.

Recently Separated Veteran means:

- (1) Any veteran during the three-year period beginning on the date of such veteran's discharge or release from active duty in the U.S. military, ground, naval, or air service.

Active Duty Wartime or Campaign Badge Veteran means:

- (1) A veteran who served on active duty in the U.S. military, ground, naval or air service during a war, or in a campaign or expedition for which a campaign badge has been authorized under the laws administered by the Department of Defense.

Armed Forces Service Medal Veteran means:

- (1) A veteran who, while serving on active duty in the U.S. military, ground, naval or air service, participated in a United States military operation for which an Armed Forces service medal was awarded pursuant to Executive Order 12985.

Collectively, we refer to all of these veterans as "protected veterans."

Disability, or Disabilities, with respect to an individual, means:

- (1) A physical or mental impairment that substantially limits one or more major life activities for such individual;
- (2) A record of such an impairment or being regarded as having such an impairment.

This definition does not include individuals:

- (a) currently engaging in the illegal use of drugs when the university acts on the basis of such use;
- (b) whose current use of alcohol prevents them from performing the essential functions of the employment position or whose current alcohol abuse would constitute a direct threat to property or to the health or safety of the individual or others; or

(c) who currently have a contagious disease or infection that prevents them from performing the essential functions of the employment position, or who, by reason of such disease or infection, would constitute a direct threat to the health or safety of the individual or others.

Collectively, we refer to individuals with disabilities as “disabled” or “individuals with disabilities.”

## **A. Policy Statement on Behalf of Protected Veterans and Individuals with a Disability**

41 CFR §§ 60-300.44(a) and -741.44(a)

In order to provide equal employment and advancement opportunities to all individuals, employment decisions at the University of Oregon (UO) will be based on merit, qualifications and abilities. It has been and shall continue to be both the official policy and the commitment of the university to further equal employment opportunities for all persons regardless of, among other characteristics, disability or protected veteran status. The university's EEO policy, as well as its affirmative action obligations, has the full and complete support of the university, including its president. This policy governs all aspects of employment, including selection, job assignment, compensation, discipline, termination, and access to benefits and training.

In furtherance of its EEO policy, the university will recruit, hire, train, and promote persons in all job titles, and ensure that all other personnel actions are administered, without regard to disability or protected veteran status. The UO will also ensure that all employment decisions are based only on valid job requirements, except that a preference in hiring and promotions is granted to veterans and disabled veterans who qualify under Oregon Statute 408.230 (Veterans' Preference in Public Employment).

The University of Oregon will make reasonable accommodations for qualified disabled veterans and individuals with known disabilities unless doing so would result in an undue hardship.

Harassment of any individual on the basis of disability or protected veteran status is prohibited. Employees and applicants can raise concerns and make reports without fear of reprisal. They will not be subjected to harassment, intimidation, threats, coercion or discrimination because they have engaged in or may engage in any of the following activities:

- (1) filing a complaint;
- (2) assisting or participating in any investigation, compliance evaluation, hearing, or any other activity related to the administration of any federal, state, or local equal opportunity or affirmative action statute;
- (3) opposing any act or practice made unlawful by federal, state or local law requiring equal employment opportunity or affirmative action; or
- (4) exercising any other employment right protected by federal, state or local law or its implementing regulations.

For information regarding the university's internal policies addressing complaints of harassment, please refer to the resources available on the Office of Affirmative Action and Equal Opportunity (AAEO) website. Any employees with questions or concerns about any type of discrimination or harassment in the workplace are encouraged to bring these issues to the attention of AAEO or their supervisor.

Michael H. Schill, UO President, has overall responsibility for equal opportunity and affirmative action compliance and expects that each member of the university community will support his commitment to equal opportunity and affirmative action. Responsibility for implementation of the equal employment opportunity programs and for affirmative action compliance activities, including a commitment to respond to any specific complaints applicants or employees may file with the university's equal opportunity office, is assigned to Nancy Resnick, Interim Director of the Office of Affirmative Action and Equal Opportunity and Chief Human Resources Officer.

## **B. Review of Personnel Processes**

41 CFR §§ 60-300.44(b) and -741.44(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 with known disabilities or who are known protected veterans, including disabled veterans, for job vacancies filled either by hiring or promotion and for all training opportunities. In addition, the university ensures that applicants and employees with disabilities have equal access to its personnel processes, including those implemented through information and communication technologies.

UO provides any necessary reasonable accommodation to ensure applicants and employees with disabilities receive equal opportunity in the operation of personnel processes. When a known protected veteran applies for employment, only those portions of the veteran's military record relevant to the requirements of the applied-for position are considered. The university also ensures that its personnel processes do not stereotype protected veterans or individuals with disabilities in a manner that limits their access to jobs for which they are qualified.

Personnel processes are reviewed periodically and modifications are made as necessary to ensure compliance with applicable requirements. To facilitate this assessment, we have created a checklist that will be reviewed annually. Following are some of the processes reviewed and, if necessary, modifications being implemented as a result of the review:

1. The university invites applicants and employees to self-identify as protected veterans or individuals with a disability. With the implementation of a new talent management system in October 2016, it is now easier for applicants to complete this voluntary self-identification process. These forms also encourage applicants and employees to inform us if they require a reasonable accommodation to apply for or perform a job.
2. The information from the self-identification forms is retrievable for review by the Department of Labor and by university officials for use in investigations and internal compliance activities.
3. UO's new on-line talent management system (MyTrack) is compliant with Web Content Accessibility Guidelines (WCAG) 2.0.
4. In each case where a known protected veteran or individual with a disability 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.



5. The Office of Affirmative Action and Equal Opportunity keeps records that contain a description of any accommodation that made it possible to place a disabled veteran or individual with a disability on the job. These records are treated as confidential medical records.
6. Records are kept for all employees, including protected veterans and individuals with disabilities, that identify the UO courses or e-learning opportunities in which they have participated. As part of the continuing upgrade of the university's overall talent management processes, the training opportunities identified for employees by their supervisors will also be tracked.

In addition to meeting its obligations as a federal contractor, as addressed above, the University of Oregon has taken steps to ensure that applicants who qualify as covered veterans under the State of Oregon Veterans' Preference regulations receive preference in their consideration for employment with the university as required by those regulations.

## **C. Review of Physical and Mental Qualifications**

41 CFR §§ 60-300.44(c) and -741.44(c)

The University of Oregon reviews the physical and mental qualifications of all its jobs. None have requirements that tend to screen out qualified disabled veterans or individuals with disabilities unless they are job-related and consistent with business necessity and the safe performance of the job. Specific procedures include:

1. The university reviews physical and mental qualifications of a job whenever the job specifications or position description for that job are revised.
2. Prior to posting for a vacancy, all aspects of a job description are reviewed, including physical and mental qualifications.
3. Procedures related to the performance review process for faculty, officers of administration, and classified employees are outlined on the Human Resources web site. A review of duties and responsibilities by both the employee and supervisor, including any stated physical or mental qualifications, is an integral part of each of these processes and the duties are revised as necessary.
4. Records are maintained relating to the specific reasons for non-selection of applicants, including disabled veterans and individuals with disabilities. These records are carefully reviewed to ensure that such reasons are job-related and consistent with business necessity.
5. Any applicant or employee with a disability that may require an accommodation due to a specific physical or mental qualification is encouraged to contact AAEO. All such requests are promptly reviewed and appropriate accommodations implemented, if warranted.
6. 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 known disabilities, the criteria are carefully reviewed to ensure that they are job-related and consistent with business necessity and the safe performance of the job.

## **D. Reasonable Accommodation to Physical and Mental Limitations**

41 CFR §§ 60-300.44(d) and -741.44(d)

Reasonable accommodations are offered to the known physical and mental limitations of otherwise qualified disabled veterans or individuals with disabilities unless it can be demonstrated that such accommodations would impose an undue hardship on the operation of the university. UO does not deny employment opportunities to an otherwise qualified job applicant or employee with a disability based on the need of the university to make reasonable accommodation to such an individual's physical or mental impairments.

When the university becomes aware that an employee who is known to be a disabled veteran or individual with a 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, the university 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.

Employees may also contact the Office of Affirmative Action and Equal Opportunity at any time to request an accommodation.

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## **E. Harassment**

CFR §§ 60-300.44(e) and -741.44(e)

The University of Oregon prohibits harassment of employees on account of their status as individuals with disabilities or protected veterans which include disabled veterans, recently separated veterans, active duty wartime or campaign badge veterans, or armed forces service medal veterans. 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 Office of Affirmative Action and Equal Opportunity.

1. This year a comprehensive review of university policies related to discrimination and harassment was undertaken, resulting in policy expansions and revisions and more resource materials being made available to the campus community. Information regarding the University of Oregon's internal policies for addressing complaints of harassment is available on the AAEO website. Topics include:
  - Discrimination complaints and procedures
  - Rights of complainants and respondents
  - Employee responsibilities to report information regarding discrimination and harassment and employee right to be protected from retaliation
  - University obligations to respond to and address reports or complaints
  - Definitions of "prohibited discrimination," "discriminatory harassment," and "sexual harassment"
2. Grievance procedures and supervisory responsibility in connection with allegations of harassment are specifically addressed during the university's supervisor training courses. 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.
3. The investigation of any such complaint shall be carried out promptly and shall involve only those persons with a need to know.
4. Any employee found to have violated university policy prohibiting harassment of another employee based on any protected status is subject to discipline up to and including discharge, depending on the severity of the offense.

## **F. External Dissemination of Policy, Outreach and Positive Recruitment**

41 CFR §§ 60-300.44(f) and -741.44(f)

Following are some of the efforts the university currently takes to disseminate our policy externally and to effectively recruit protected veterans and individuals with disabilities.

1. 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. The WorkSource Oregon veterans' employment representative forwards our openings to veterans who are encouraged to apply to those positions for which they feel qualified.
2. The local WorkSource Oregon representative, Oscar Scott, has visited the OAAEO and Human Resources offices 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.
3. 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 protected veterans as well as women, minorities, and workers with disabilities and request that they inform potential applicants of our employment opportunities. These letters include a reasonable accommodation notice and outline where applicants can go to see all of our openings and how to apply.
4. Newspaper advertisements and other recruiting communications include either an expanded statement that "The University of Oregon is an equal opportunity, affirmative action institution committed to cultural diversity and compliance with the ADA. The University encourages all qualified individuals to apply, and does not discriminate on the basis of any protected status, including veteran and disability status," or an abbreviated "EO/AA/Veterans/Disability institution committed to cultural diversity."
5. All of our jobs are posted on the Veterans Job Bank (a service of the Department of Veterans Affairs and the Department of Defense) via its linkage to the National Labor Exchange.

6. We regularly attend local hiring events to inform veterans or individuals with disabilities of employment opportunities at the university. Examples include:
  - Tapping Fresh Talent Career Expo – the UO is a participating employer in this annual career fair that focuses on individuals and veterans with disabilities. The first hour of this event often includes priority service for veterans. The most recent event was September 21, 2016.
  - Job fairs at Lane Community College and Linn Benton Community College, and Workforce Partnership Job Fairs that often include focused events just for veterans or individuals with disabilities.
  - Whenever possible, employees who are veterans or individuals with disabilities are included as university representatives at these events.
7. A written notice of the university's status as a federal contractor and its policy related to affirmative action efforts will be sent to all subcontractors. This communication requests that covered federal subcontractors take appropriate actions to comply with VEVRAA and Section 503 of The Rehabilitation Act. In addition, an equal opportunity clause, consistent with 41 CFR § 60-300.5(d), is incorporated in all covered subcontracts to make subcontractors aware that the subcontract requires that they take affirmative action to employ and advance in employment qualified protected veterans.
8. The University reviews its outreach and recruitment efforts on an annual basis to evaluate their effectiveness in identifying and recruiting qualified protected veterans and individuals with disabilities.

## **G. Internal Dissemination of Policy**

41 CFR §§ 60-300.44(g) and -741.44(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 to engage in affirmative action efforts to employ and advance in employment qualified protected veterans and individuals with disabilities, the university has developed the following internal procedures. 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. As a party to several Collective Bargaining Agreements, the university provides notice to union officials and/or employee representatives of the university's equal employment and affirmative action obligations and requests their cooperation in UO's efforts to employ and advance in employment qualified protected veterans.
3. The university's policy and the existence of the Affirmative Action Plan are discussed in new employee orientation meetings. The ADA coordinator from the Office of Affirmative Action and Equal Opportunity will also be addressing new employees regarding employee rights and university obligations surrounding the accommodation process.
4. Supervisory and management staff are informed of the university's affirmative action policies regarding protected veterans and individuals with disabilities 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.
5. Self-Identification forms, listed below, all include notifications of our obligation to take affirmative action to employ and advance in employment qualified protected veterans:
  - A "Voluntary Applicant Veteran Self-Identification Form," revised to meet the requirements of 41 CFR 60-300.42(a), and a "Voluntary Applicant Self-Identification Form for Individuals with Disabilities," revised to meet the requirements of 41 CFR 60-741.42(a), is offered to every applicant prior to making any offer of employment.

- A voluntary post-offer invitation to self-identify protected veteran status and disability status is made to every new hire before he or she begins their job duties.
  - A voluntary veteran's self-identification survey and a voluntary self-identification of disability survey was sent to all current employees in 2015. This survey informed employees that they can update their identification at any time through our self-service portal. Contact information was included for those individuals in need of an accommodation.
6. The Affirmative Action Plan for Protected Veterans and Individuals with Disabilities is available for inspection upon request by any employee or applicant during normal business hours in the Office of Affirmative Action and Equal Opportunity. The Plan is also available on the AAEO website at [Affirmative Action Plans](#).
  7. The Office of Affirmative Action and Equal Opportunity works closely with Human Resources to ensure understanding of affirmative action and equal opportunity as those concepts apply to protected veterans and individuals with disabilities.
  8. The Talent Acquisition and Development (TAD) unit within Human Resources currently provides support related to implementation of the Oregon Veterans' Preference legislation in the employment process. TAD is also planning to expand this role to provide additional resources to veterans, such as assistance in resume development to be provided by a TAD representative with military experience. This assistance will be available to both current employees and applicants.
  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.
  10. Examples of other initiatives/events aimed at increasing understanding, support and acceptance of disabled veterans and individuals with disabilities and promoting an awareness of our accommodation obligations at the UO include:
    - *Disability on Campus Forum* - a May 2016 forum for faculty, staff and students focused on increasing the level of knowledge and elevating the discussion on disabilities in universities. Nine workshops included, among others, Accommodations in the Workplace, Mental Health and Disability, Bias 101, Service Animals, and the presentation of the film "Life Worth Living: Fighting for Disability Rights" followed by a discussion.
    - *Periodic training presentations* by AAEO to the university HR Partners Network (employees who are responsible for HR functions in units across campus) - the most recent presentation, which took place in January 2017, was "The Obligation to Accommodate as an Opportunity to Promote Diversity, Equity, and Inclusion." Focus areas included the UO's commitment to diversity and



equal access to employment and facilities, a review of our legal obligations to accommodate individuals with disabilities, specifics regarding the university's accommodation process, and confidentiality and non-retaliation considerations.

- *Striving for Excellence: Strategies for Reaching the Highest Standards for Disability Inclusion* – an upcoming workshop in April 2017, hosted by the UO Division of Equity and Inclusion, is aimed at improving disability inclusion on campus. Administrators and others will explore new ideas and strategies for enhancing access and inclusion of students, faculty and staff with disabilities. Susan Sygall, co-founder of Mobility International USA and an internationally recognized expert in educational exchange and leadership programs for persons with disabilities, is one of the workshop leaders.

10. University publications and other communications include articles that focus on recognizing what individuals with disabilities or veterans can achieve. Examples include:

- An “Around the O” article in 2016 that featured employee Brittany Hinchcliffe, who was recruited by the US Marine Corps to train Wounded Warriors participating in the Invictus Games, the only international sporting event for wounded, injured and sick servicemen and women.
- A biographical spotlight on an employee within Finance and Administration that highlights employee excellence in its various forms. The spotlight may feature the employee's contributions to such things as team-building, customer service, and/or diversity and inclusion. The spotlight will be featured on various websites within the portfolio. A different employee will be spotlighted monthly. The intent is to give recognition to valued employees, highlight their strengths and uniqueness, and provide inspiration to, and promote a sense of community among, employees and prospective employees who share things in common with the individual being featured. The spotlight will also help to convey our portfolio-wide dedication to diversity and inclusion in the workplace. The pilot spotlight, recently shared via Campus Planning and Facilities Management's internal employee newsletter, featured an employee with veteran status.

## **H. Audit and Reporting System**

41 CFR §§ 60-300.44(h) and -741.44(h)

An important element in effectively implementing our EEO/AA policies is an adequate internal audit and reporting system. For this purpose we have developed a system that:

1. Measures the effectiveness of the University of Oregon'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 protected veterans or individuals with disabilities 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.
6. Documents the actions the university takes to comply with the obligations listed above and retains such documents as employment records.

Where the UO finds any portion of its affirmative action program to be deficient, the university undertakes action necessary to bring the program into compliance.

## I. Responsibility for Implementation

41 CFR §§ 60-300.44(i) and -741.44(i)

Nancy Resnick, Chief Human Resources Officer, serves as equal employment opportunity officer for the University of Oregon. Ms. Resnick is responsible for implementing, monitoring, and administering the affirmative action program for protected veterans and individuals with disabilities.

**A. The Equal Employment Opportunity Officer** has the full support of senior executive leadership within the university and the necessary staff to implement this program and will continue to:

- Develop policy statements, affirmative action programs, and internal and external communication techniques, including discussions with managers, supervisors and employees, to ensure the university'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 various enforcement agencies, community 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 protected veterans or individuals with disabilities.

**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 actions as outlined in this Plan.

## **J. Training of Personnel Involved in Selection**

41 CFR §§ 60-300.44(j) and -741.44(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 protected veterans and individuals with disabilities are carried out.

The university provides several supervisor training courses. Included are:

1. Emerging Supervisors Series – this 5-session course is designed for employees interested in exploring leadership principles and supervisory practices. The role of the supervisor in hiring and managing others is one focus area and includes a discussion of how to apply principles that create a respectful working environment that includes the topics of discrimination, equity, and the impacts of both concepts on managing the work of others. Also included is a session on understanding the ADA, reasonable accommodations, and privacy of employee information as well as identification of the steps in the progressive discipline process at the UO.
2. Supervision Course 1: Strategic Supervision – this 3-session course for current supervisors focuses on the guiding principles that drive supervisory decisions. Among these is an examination of practices surrounding organizational continuity planning and how to ensure that the unit's employees have the skills and/or receive the training necessary to ensure accomplishment of the unit's work goals. This cross training encourages more employee engagement and provides advancement opportunities for employees.
3. Supervision Course II: Recruitment and Hiring - a 4-session course that covers the steps in the hiring process at UO, starting with development of an effective and accurate position description; best practices in recruitment, evaluation and selection; onboarding; and appropriate compensation practices for promoting competitive wages and advancement and growth for current employees.
4. Supervision Course III: Shaping Successful Performance – this 3-session course works with supervisors to implement the Performance Cycle. Performance management and performance reviews; effective partnerships with UO Labor Relations; and understanding medical leave laws and Workers' Compensation are key elements of these sessions.

Attendance lists are maintained for all of these courses.

Additional courses offered and actions being taken to inform employees involved in the selection process of the university's affirmative action commitments include:

- On-site training delivered by BOLI (State of Oregon, Bureau of Labor and Industries) which covers civil rights laws and protected classes, wage and hour laws, leave laws, ADA/disability rights, understanding and avoiding workplace harassment,

lawful and effective interviews, documenting performance issues, effective performance appraisals, and employee discipline.

- HR Partners Network – this group of employees who are responsible for HR functions, including recruitment and hiring, in units across campus, receive periodic training that includes topics such as disability in the workplace and the accommodation process, confidentiality requirements, policy updates, and the disciplinary and grievance processes.

At the request of hiring units, search committees, or others involved in the recruitment, selection, promotion, disciplinary, and related processes, Human Resources is available for training and consultation when any questions or issues arise related to the implementation of the university's affirmative action commitments.

## **K. Data Collection and Benchmark Recruitment Goals for Protected Veterans and Utilization Goals for Individuals with Disabilities**

41 CFR §§ 60-300.44(k) and -300.45

41 CFR §§ 60-741.44(k) and -741.45

The University of Oregon has chosen to adopt OFCCP's (currently) 6.9% "hiring benchmark" goal for protected veterans as opposed to calculating its own percentage goal. OFCCP's 6.9% "benchmark goal" is not a rigid and inflexible quota which the university must meet, nor is it intended to represent a ceiling or floor for the recruitment of qualified protected veterans.

Recruitment and hire data for individuals with disabilities is maintained by the university as a quantifiable method that can be used to evaluate the representation of individuals with disabilities in each job group within the university's workforce. An annual assessment is made as to whether the university's efforts have been successful in attaining OFCCP's 7% utilization goal for the employment of qualified individuals with disabilities in each job group. This utilization goal is not a rigid and inflexible quota which the university must meet, nor is it intended to represent a ceiling or floor for the recruitment of qualified individuals with disabilities.

As required, the university collects data pertaining to applicants and hires on an annual basis and retains this data for three years. This information, along with other workforce data, is used to compare the university's recruitment, hiring, and total employment results against the 6.9% "hiring benchmark" for protected veterans and the 7.0% utilization goal for individuals with disabilities in each job group.

For a number of reasons, there may be a significant number of individuals with disabilities in the UO workforce who have chosen not to complete the voluntary self-identification and are not reflected in our data. Challenges that the university, as well as other federal contractors, are facing include:

- For a variety of reasons, many employees still do not feel comfortable self-disclosing disability status
- Some employees who may meet the definition of having a disability do not consider themselves disabled
- Individuals may complete the self-identification form as an applicant, but not the post-offer form