



**UNIVERSITY
OF OREGON**

**AFFIRMATIVE ACTION PLAN
FOR PROTECTED VETERANS**

March 1, 2016 – February 28, 2017

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UNIVERSITY OF OREGON

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FOR PROTECTED VETERANS**

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 H. Schill, President
University of Oregon**

Effective Date: March 1, 2016

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."

A. Policy Statement on Behalf of Protected Veterans

41 CFR § 60-300.44(a)

In order to provide equal employment and advancement opportunities to all individuals, employment decisions at the University of Oregon 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 protected 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 an investigation, compliance evaluation, hearing or any other activity related to the administration of the affirmative action provisions of VEVRAA or any other federal, state or local equal employment opportunity or affirmative action statute;
- (3) opposing any act or practice made unlawful by VEVRAA or its implementing regulations at 41 CFR § 60-300, or any other federal, state or local law requiring equal opportunity for protected veterans; or
- (4) exercising any other employment right protected by VEVRAA or its implementing regulations under 41 CFR § 60-300.

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. 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 the OAAEO or their supervisor.

Michael Schill, 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 affirmative action requirements has been assigned to Penelope Daugherty, Director of the Office of Affirmative Action and Equal Opportunity. The University of Oregon maintains an audit and reporting system to determine overall compliance with its equal employment opportunity mandates.

B. Review of Personnel Processes

41 CFR § 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 known protected veterans, including disabled veterans, for job vacancies filled either by hiring or promotion and for all training opportunities.

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 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. To facilitate this assessment, we have created a checklist which is 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. The information from these self-identification forms is retrievable for review by the Department of Labor and by university officials for use in investigations and internal compliance activities.
2. Each UO "Jobs" page position announcement includes contact information for those protected veterans or other applicants who may need a reasonable accommodation. Further information regarding the reasonable accommodation process will be placed on the main "Job Openings" page. Applicants are also notified that alternate formats are available.
3. In each case where a known protected veteran or disabled 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.
4. The Office of Affirmative Action and Equal Opportunity keeps records that contain a description of any accommodation which made it possible to place a disabled veteran on the job. These records are treated as confidential medical records.
5. Records are kept for all employees, including protected veterans, that identify the UO courses or e-learning opportunities in which they have participated. As part of a larger effort currently underway to upgrade 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)

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 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. As part of the required annual performance review process for all employees, job descriptions, including any physical and mental qualifications, will be reviewed by both the employee and supervisor and revised if necessary.
4. Records are maintained relating to the specific reasons for non-selection of applicants, including disabled veterans. These records are carefully reviewed to ensure that such reasons are job-related and consistent with business necessity.
5. Any disabled veteran applicant or employee requiring an accommodation due to a specific physical or mental qualification is encouraged to contact the OAAEO. 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 disabled veteran applicants, the criteria are carefully reviewed to ensure that they are job-related and consistent with business necessity.

D. Reasonable Accommodation to Physical and Mental Limitations

41 CFR § 60-300.44(d)

Reasonable accommodations are offered to the known physical and mental limitations of otherwise qualified disabled veterans unless it can be demonstrated that such accommodations would impose an undue hardship on the operation of the university.

If an employee who is known to be a 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, 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.

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)

The University of Oregon prohibits harassment of employees on account of their status as 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 Equal Employment Opportunity Officer in the Office of Affirmative Action and Equal Opportunity.

1. 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.
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)

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

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 of employment opportunities at the university. Examples include:
 - Tapping Fresh Talent Career Expo – the UO is a participating employer in this annual spring career fair that focuses on individuals and veterans with disabilities. The first hour of this event usually includes priority service for veterans.
 - Hiring our Heroes Veterans Event – a free 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. This event normally takes place in July at the Lane County Armed Forces Reserve Center and includes local and national sponsors such as the Department of Labor Veterans' Employment and Training Service, the Oregon Committee of the Employer Support of the Guard and Reserve, and the US Department of Veterans Affairs. The last event we attended was July 17, 2015.
 - Whenever possible, employees who are veterans 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 has just completed its first affirmative action year since implementation of the new VEVRAA regulations in 2014. We are now annually assessing the effectiveness of our external outreach and recruitment efforts. In areas where it is concluded that our efforts were not successful, we have identified and will be implementing alternative efforts. Efforts being considered include:
 - Formal on-campus briefing sessions and tours with representatives from local recruiting sources for protected veterans.
 - Development of a comprehensive list of current efforts aimed at encouraging outreach to and employment of protected veterans. Arrangements with veteran and disabled worker employment sources, job coaches, and interagency agreements with the Department of Veteran Affairs are some of the individual department efforts which may be expanded to other campus units.
 - Encouraging the involvement of current protected veteran employees in recruiting and other university-promoting or community participation events.
 - Meeting individually with veteran or disabled advocacy agencies to brainstorm and develop other efforts.

G. Internal Dissemination of Policy

41 CFR § 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 to engage in affirmative action efforts to employ and advance in employment qualified protected veterans, 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. Additional locations have been identified and we are in the process of posting the EEO policy statement in those locations.
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.
4. Supervisory and management staff are informed of the university's affirmative action policies regarding 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.
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), is offered to every applicant prior to making any offer of employment.
 - A voluntary post-offer invitation to self-identify protected veteran status is made to every new hire before he or she begins their job duties.
 - A voluntary veteran's self-identification 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 veterans in need of an accommodation.

6. The Affirmative Action Plan 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 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 protected veterans.
8. 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.

H. Audit and Reporting System

41 CFR § 60-300.44(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 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)

Penelope Daugherty, director of the Office of Affirmative Action & Equal Opportunity, serves as equal employment opportunity officer for the University of Oregon and has the full support of top administration within the university. Ms. Daugherty is responsible for implementing, monitoring, and administering the affirmative action program for protected veterans.

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 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 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 protected 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.

J. Training of Personnel Involved in Selection

41 CFR § 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 protected veterans 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 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 2-session course 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 3-session course that covers the steps in the hiring process at the UO, starting with development of an effective and accurate position description, appropriate compensation levels, advertising, recruitment, working with search committees, and using job-related selection processes.
4. Supervision Course III: Shaping Successful Performance – this 4-session course works with supervisors to implement the Performance Cycle. Annual review of position descriptions, appropriate feedback and coaching throughout the year, annual performance reviews and effective partnerships with UO Labor Relations 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.

- A fact sheet has been developed that will be sent, upon approval of a search, to the search committee chairperson, hiring manager, and contact person for each active recruitment. This document summarizes the elements involved in the university's obligation to employ and advance in employment protected veterans. Responsibilities related to the equal opportunity clause, job qualification standards, outreach and recruitment, reasonable accommodation procedures, anti-harassment procedures, screening and selection processes, and documentation requirements are outlined. This information is to be shared with any others involved in the search, including additional search committee members and support staff.

K. Data Collection and Benchmark Hiring Goal for Protected Veterans

41 CFR §§ 60-300.44(k) and 60-300.45

The University of Oregon has chosen to adopt OFCCP's (currently) 7.0% "hiring benchmark" goal for protected veterans as opposed to calculating its own percentage goal. OFCCP's 7.0% "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.

As required, the university collects data pertaining to applicants and hires on an annual basis and retains this data for three years. This data, along with other workforce data, will be used to compare the university's recruitment, hiring, and total employment results against the 7.0% "hiring benchmark" for protected veterans.