

# Affirmative Action Plan

Women and Minorities

2023 Plan Year

*01/01/2023-12/31/2023*



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## 2. Introduction

The System Office is committed to the concept and practice of equal opportunity, nondiscrimination,

### 3. Statement of Equal Employment Opportunity, Nondiscrimination and Affirmative Action

It is the policy of The University of Alabama System Office and each of its constituent campuses to provide equal employment opportunities to all qualified persons regardless of gender identity or expression, race, color, religion, age, national origin, sexual orientation, marital status, physical or mental disability, or veteran's status pursuant to, but not limited to, Federal Executive Orders 11246 and 11375 and RSA 345A (1965) of the General Laws of New Hampshire, and Section 503 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act of 1990 and amendments of 2008.

The University of Alabama System complies with applicable laws prohibiting discrimination, including Titles VI and VII of the Civil Rights Act of 1964, the Age Discrimination in Employment Act, Executive Order 11246, Title IX of the Education Amendments of 1972, Sections 503 and 504 of the Rehabilitation Act of 1973, the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended by the Jobs for Veterans Act of 2002 (VEVRAA), the Age Discrimination Act of 1975, the Americans with Disabilities Act of 1990, the ADA Amendments Act of 2008, and the Genetic Information Nondiscrimination Act of 2008 and does not discriminate on the basis of genetic information, race, color, religion, national origin, sex (which includes sexual orientation, gender identity, and gender expression), age, disability, or protected veteran status in admission or access to, or treatment of employment in its programs and services. All managers and supervisors are required to actively follow this policy to ensure that all qualified applicants and employees who are women, minorities, have disabilities, or have protected veteran status are considered and treated in a non-discriminatory manner with respect to all employment-related decisions.

The System Office's Nondiscrimination Notice extends to all personnel matters, including hiring, upgrading, transfer, demotion, recruitment or recruitment advertising, layoff, termination, compensation, benefits, and System-sponsored training and social and recreational programs. The System Office bases employment sba8nBT3 15555jch policy to Office bases employment trA1

In accordance with public law, the System Office's program of affirmative action for qualified individuals with disabilities and the program of affirmative action for protected veterans are available for inspection in the Human Resources Department,

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#### 4. Sex Discrimination Policy - 41 C.F.R. 60-20.1 – 60-20.6

Pursuant to the System Office's equal employment opportunity and affirmative action policy, we have adopted the following policy prohibiting sexual discrimination and harassment in the workplace. This policy applies to all terms and conditions of employment, including but not limited to, recruitment, hiring, promotion, transfer, demotion, layoff or recall from layoff, termination,

5. Guidelines on Religion and National Origin ` 41 C.F.R. 60-50.1 ` 60-50.5



## 6. Responsibility for Implementation | 41 C.F.R. 60-2-17

The overall responsibility and accountability for implementing the System Office's AAP rests with the Chancellor of The University of Alabama System and other senior executive officers. The Chancellor disseminates an annual statement supporting the System Office's affirmative action program through a Nondiscrimination Notice, and urges every employee to comply with the System Office's equal opportunity, affirmative action, nondiscrimination and anti-retaliation policies. All employees receive a printed copy of this statement, and it is also posted online.

Jon Garner, Assistant Vice Chancellor Director for Human Resources oversees implementation of the System's AAP. The Director ensures all other department directors, managers and supervisors adhere to all relevant policies and procedures.

The Director's responsibilities include, but are not

Policy as a term of their employment and out of respect for other members of the System community. The System Office offers training to help ensure compliance.

To support hiring officials and further promote awareness of their responsibilities, the System Office maintains a centralized staff training function in Human Resources to provide training in management/supervisory development, job skills development, System Office procedures, and special interest topics.

New employee orientation sessions include a review and distribution of printed materials concerning the System Office's Equal Opportunity Policy and affirmative action commitment, employees' rights and responsibilities, and resources available for conflict resolution and other employee assistance.

Staff members in management positions complete a new manager's training which includes training related to harassment, discrimination, ~~discretion~~, ~~discretion~~.

In addition to the centralized training available to all employees receive additional annual training on System

## 7. Organizational Profile | 41 C.F.R. 60-2.11

As one of the diagnostic components of the System Office's AAP, and to conform to applicable regulations, the System Office has completed a profile of the workforce at the organization. The organizational profile is an overview of the staffing patterns at this establishment and is used to determine whether there are areas in the workforce where individuals are underrepresented or concentrated by gender or race. To complete our organizational profile we have elected to follow the Workforce Analysis Setting methodology.

The following charts set forth our Workforce Analysis. The analysis identifies the departments at the System Office establishment and for each department lists all job titles from lowest to highest paid. For each job title, we provide the following data: the total number of incumbents, the total number of male and female incumbents, and the total number of male and female incumbents by racial/ethnic group.

## 8. Job Group Analysis | 41 C.F.R. 60-2.12

The System Office, with assistance from its consultant, has completed a workforce analysis as required by 41 C.F.R. § 60-

## 9. Availability Analysis | 41 C.F.R. 60-2.14

### Determining Availability

Availability is an estimate of the number of qualified minorities or women available for employment

## 10. Comparing Incumbency to Availability | 41 C.F.R. 60-2.15

After placing incumbent workers in job groups and determining availability, both externally and internally, the System Office compared the representation of minorities and women in each job group to the respective availability for those job groups. Where actual representation was less than the calculated availability, the System Office determined whether the differences was greater than could be reasonably expected. The comparison of availability with actual representation is detailed in the charts that follow.

## 11. Placement Goals | 41 C.F.R. 60-2-16

The System Office established placement goals based on the comparison of incumbency to availability. A placement goal is established whenever employment of minorities or women as of the snapshot indicates statistical significance below their estimated availability in a job group or is less than what would be reasonably expected based on calculated availability.

While the System Office does not set rigid quotas, the percentages of minority and female incumbents should generally match expected percentages based on estimates of availability of minorities and women in relevant labor markets. The System Office strives to make good faith efforts to achieve placement goals. To ensure a constitutional and nondiscriminatory employment process, the System adheres to the following guidelines when placement goals are set:

Placement goals are neither quotas that must be met, nor are they to be

## 12. Identification of Problem Areas by Organizational Unit and Job Group 41 C.F.R. 60-2.17(b)

We have conducted analyses of our total employment process, including evaluating the workforce by organizational unit and job group, personnel activity, compensation systems, and other personnel procedures to determine whether and where impediments to equal employment opportunity exist.

An analysis of each of these processes follows.

### Composition of the Workforce by Organizational Unit

Our analysis by organizational unit reveals that minorities and women are not significantly underrepresented or concentrated in any particular organizational unit. This analysis suggests that there is no policy or practice excluding minorities or women from any departments, nor is there any racial or sexual discrimination in the selection process.

### Composition of the Workforce by Job Group

Pursuant to OFCCP regulations, we have conducted an availability analysis by job group, taking into account both external and internal availability, and have compared incumbency to estimated availability to determine placement goals. The descriptions of Factor 1 and Factor 2 by job group are summarized in the Availability Analysis. Our findings are as follows:

1. Our analysis, conducted in accordance with OFCCP regulations, reveals that underutilization by job



### 13. Personnel Activity Analysis

The System Office reviews its personnel procedures to assess whether employees or job applicants who are women or minorities are fully and fairly considered for job vacancies, promotions, and/or educational or training opportunities and to assure that the personnel processes facilitate the implementation of the System Office's affirmative action commitments. Consistent with 41 C.F.R. § 60-2.17 (b), the System Office performs an analysis of its total employment process to determine whether impediments to equal employment opportunity exist and to determine

Open staff positions are posted on the System's online recruitment and employee management system by Human Resources after a job requisition has been submitted by a hiring department and approved by reviewing officials. The requisition includes the position requirements and recruitment details. Reviewing officials, including the Compliance Officer as appropriate, focus on whether the position requirements are job related and nondiscriminatory, and whether the recruitment plan adequately identifies sources of advertisement and special efforts to reach minority and women candidates. Further, individual job listings also have the EEO statement at the bottom.

In addition to the online recruitment and employee management system, departments use other advertising sources as needed to ensure a diverse applicant pool when advertising staff positions, including Facebook, Twitter, LinkedIn, , U. S. Military Pipeline, newspapers, and specialized trade and professional publications. Frequently used newspapers include and

Advertisements may include only bona fide occupational qualifications and may not be listed under a classified heading indicating " male or " female" unless sex is a bona fide occupational qualification. Advertisements and other forms of position announcements must include the following statement:

The University of Alabama System is an equal opportunity employer (EOE), including an EOE of protected vets and individuals with disabilities.

Personal characteristic items that are not job-related are excluded from the online application form. During the application process, applicants are invited to voluntarily self-identify race, gender, and their status as a protected veteran and/or an individual with a disability. While this information is not

## Hires and Hiring Processes

The System Office provides an open transfer and promotion system for staff employees. Employees are permitted to apply for other positions in the System Office without advance approval by, or notice to, their present supervisor. However, employees are expected to give adequate notice of their acceptance of another position, as would be the case in accepting a position outside the System Office.

The internal promotion policy permits selected staff vacancies to be restricted to internal applicants only and allows intradepartmental promotion of qualified employees on a case-by-case basis if approved by Human Resources and the Vice Chancellor (or designee) of the hiring department.

Employees at the System Office are eligible for an education tuition benefit for themselves upon hire and for their dependents after six months of employment. This benefit allows employees to further their education, enhancing their opportunity for promotion.

### Compensation Process

The System Office has evaluated its compensation processes utilized for staff and found it to be free from discriminatory practices against women or minorities.

### Staff Compensation

Human Resources works with develops compensation programs, policies, and procedures applicable to staff. Compensation guidelines establish and maintain a system of compensation and benefits that help managers and employees understand the processes involved in salary administration as it relates to System Office staff. The System Office attempts to meet or exceed compensation in comparable labor markets, and includes staff pay ranges that guide compensation both at hiring and promotions. These pay ranges are based on the classification of the position description within a specific pay grade.

### Human

gender expression), or any other characteristic protected by applicable law.

In conjunction with the review of its personnel processes, the System Office has reviewed the terminations that occurred between 01/01/2022 and 12/31/2022 and is satisfied that the process is not discriminatory against women or minorities or any other protected status.

#### Staff Terminations

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## 14. Action-Oriented Programs | 41 C.F.R. 60-2.17

The System Office has developed and is executing action-oriented programs designed to correct any problem areas that may exist and to support the System Office's commitment to equal opportunity in employment for women and minorities.

The System Office has analyzed and will continue to analyze all positions and prepare written descriptions to accurately reflect position functions. Due to the use of a position description format, they are and will continue to be consistent for the same position from one organizational unit to another.

Job descriptions have been and will continue to be reviewed to determine the knowledge, skills, abilities, and other requirements necessary for the adequate performance of every job. Specifications will continue to be consistent for the same job title in all organizational units and will not contain any requirements that would result in discrimination on the basis of sex, gender, sexual orientation, race, color, religious creed, national origin, physical or mental disability, protected veteran status, or any other characteristic protected by law.

Job descriptions are available to incumbents and all members of management involved in the recruiting, screening, selection, and promotion process. Job descriptions are also made available to employees, applicants, and recruiting sources as appropriate.

The System Office has carefully evaluated the total selection process and found it to be free from discrimination.

- We have instructed all supervisory personnel to ensure elimination of discrimination in all personnel actions in which they are involved.
- Any tests administered by the System Office are job related and given to all applicants for applicable positions.
- Application forms do not contain questions with potential discriminatory effects.
- The System Office does not and will not use any selection techniques that can be improperly used to discriminate against minority groups or women.

The System Office evaluated techniques for improving recruitment and increasing the flow of qualified minority or female applicants by utilizing some or all of the following:

Minority and women, as well as non-minority and male, employees are actively encouraged to refer applicants to our organization.

The System Office relies on the State Department of Labor and recruiting programs sponsored by local community colleges and other community organizations.

The System Office will continue to contact our normal sources of recruiting (e.g., Alabama Career Center or State Employment Agency) and advise them under the AAP we are

These programs, together with the various personnel processes, demonstrate our good faith efforts to remove identified barriers, expand employment opportunities, and produce measurable results.

Finally, the System Office has developed and implemented procedures to ensure that employees who are women or minorities are not illegally discriminated against or harassed because of their race or gender, or retaliated against for bringing a complaint. The following policies, procedures and training programs further strengthen the System Office's commitment to equal opportunity in employment:

The procedures for addressing harassment or retaliation are contained in the System's Policies and Procedures, which can be viewed on the System Office website. Discrimination, harassment or retaliation complaints should be directed to the Vice Chancellor for Risk and Compliance for the System Office. Once reported to appropriate official, a prompt and appropriate investigation of complaints of unlawful discrimination is conducted according to the complaint procedures of the System Office, and measures are taken to prevent future instances of illegal discrimination and/or harassment.

The Human Resources Director's annual Nondiscrimination Notice encourages members of the System community to review the information on the System website, and to refer those with issues of concern to that website to ensure prompt reporting to the appropriate System Office officials.

New employees attending new employee orientation receive information about website and the System Office's anti-discrimination, harassment, and retaliation policies.

## 15. Internal



Resources. OnBase is one of the sources of employee information used for workforce reports and utilization analyses in addition to the staff online recruiting systems.

To ensure that the personnel assisting with the annual audit have accurate information, all records concerning applicants for employment will be maintained for three years, and all personnel actions will be individually maintained as a part of an

