

**AFFIRMATIVE ACTION PROGRAM  
FOR  
PROTECTED VETERANS**

**Oklahoma State University-Oklahoma City**

OSU-OKC

November 1, 2019 through October 31, 2020

# Table of Contents

Preface

Equal Employment Opportunity and Affirmative Action Statement of Policy

Definitions

Responsibility for Implementation

Request for Self-Identification

Review of Personnel Policies

Review of Physical and Mental Job Requirements

Reasonable Accommodations

Compensation

Internal Communication Procedure

Harassment

Training

Internal Dissemination of Policy

Outreach, Positive Recruitment and External Dissemination of Policy

Data Collection Analysis

Hiring Benchmarks

Monitoring and Reporting Systems

List of Exhibits

## Preface

Oklahoma State University-Oklahoma City (also referred to as the University) is committed to the concept and practice of equal opportunity and affirmative action. In the preparation of this affirmative action program (AAP), we have been guided by the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended by the Jobs for Veterans Act of 2002 (38 U.S.C. § 4212), and its implementing OFCCP regulations (41 C.F.R. Part 60-300). Nothing contained in this AAP or its supporting data should be construed as an admission by the University, in whole or in part, that it has contravened any federal, state, or local employment practice laws.

In developing and implementing this AAP, Oklahoma State University-Oklahoma City has been guided by its established policy of providing equal employment opportunity. Nothing herein is intended to sanction the discriminatory treatment of any person. Thus, this AAP has been developed in strict reliance upon the Guidelines on Affirmative Action issued by the Equal Employment Opportunity Commission (EEOC) (29 C.F.R. Part 1608).

While the University firmly believes in dissemination of its affirmative action policies and equal employment opportunity practices and makes the non-data components of this AAP available for review to employees and applicants upon request, the AAP remains a University proprietary document. Moreover, the data on which the University has relied in preparing this AAP are confidential and sensitive, and the University believes release of the data would subject the University to commercial harm. Therefore, the following is requested:

- If this AAP or any supporting data or documentation are submitted to Office of Federal Contract Compliance Programs (OFCCP) pursuant to the Executive Order, the Rehabilitation Act, The Vietnam Era Veterans' Readjustment Assistance Act and/or any implementing regulations (as any or all have been or may be amended), those documents and the information they contain are to be considered confidential and not subject to disclosure without notifying the University of the agency's decision to disclose and providing the University with ample time to contest the disclosure. Advance notice of disclosure should be sent to Mrs. Melissa Herren. The University requests this information be treated as exempt from public disclosure under the Freedom of Information Act, 5 U.S.C. § 552.
- If this AAP or any supporting data or documentation is supplied by University to another government contractor, EEOC or fair employment practices agency representatives, or any other person, it is not to be copied, reproduced, or disclosed by such persons without prior notification to the University.
- No information contained in the AAP or any supporting data or documentation is to be copied, removed from the premises, or released to other individuals without a prior notification to and permission from the University.
- Reports that require specific data, such as names of employees and salary information, are not an official part of this AAP. This information is on file at the University as Documentation and Supporting Data for AAP Reports and is available for review only as required by law.

This AAP does not constitute an express or implied contract between the University and its employees, job applicants, or other persons, nor does it change in any way the basic at will employment relationship all University employees have with the University. Nothing in this AAP creates a private right of action on behalf of any individual or group against the University.

## **Equal Employment Opportunity and Affirmative Action Statement of Policy**

### **41 C.F.R. 60-300.44(a)**

It is the policy of Oklahoma State University-Oklahoma City not to discriminate or allow the harassment of employees or applicants on the basis of sex, gender identity, sexual orientation, race, color, religious creed, national origin, physical or mental disability, protected veteran status, or any other characteristic protected by law with regard to any employment practices, including recruitment, advertising, job application procedures, hiring, upgrading, training, promotion, transfer, compensation, job assignments, benefits, and/or other terms, conditions, or privileges of employment, provided the individual is qualified, with or without reasonable accommodations, to perform the essential functions of the job. This policy applies to all jobs at the University. The University will continue to ensure that individuals are employed, and that employees are treated during employment, without regard to their sex, gender identity, sexual orientation, race, color, religious creed, national origin, physical or mental disability, protected veteran status, or any other characteristic protected by law in all employment practices as follows:

Employment decisions at the University are based on legitimate job related criteria. All personnel actions or programs that affect qualified individuals, such as employment, upgrading, demotion, transfer, recruitment, advertising, termination, rate of pay or other forms of compensation, and selection for training, are made without discrimination because of any basis protected by law. Employees may choose to voluntarily disclose their sex, race, national origin, disability and protected veteran status at any time by contacting Human Resources. Such information will be maintained in a confidential manner and will not be used against an individual when making any employment decisions. Employees and applicants with disabilities and disabled veterans are encouraged to inform Human Resources if they need a reasonable accommodation to perform a job for which they are otherwise qualified. The University makes, and will continue to make, reasonable accommodations to the known physical or mental limitations of an otherwise qualified applicant or employee to promote the employment of qualified individuals with disabilities and disabled veterans, unless such accommodations would impose an undue hardship on the operations of the University's business.

Oklahoma State University-Oklahoma City, and our President are fully committed to principals of equal employment opportunity and affirmative action. As Assistant VP/Administration & Finance, Human Resources, I support the successful implementation of the University's Affirmative Action Programs. I have appointed Mrs. Melissa Herren, Affirmative Action Officer for the University, with responsibility for implementation of the University's affirmative action activities. The Affirmative Action Officer has the full support of top management and the staff necessary to fully implement this Program. All managers and supervisors will take an active part in the University's AAP to ensure all qualified employees and prospective employees are considered and treated in a nondiscriminatory manner with respect to all employment decisions. Furthermore, Oklahoma State University-Oklahoma City will solicit the cooperation and support of all employees for the University's Equal Employment Opportunity and Affirmative Action Policy.

Our Affirmative Action Programs include an audit and reporting system, which, among other things, uses metrics and other information to measure the effectiveness of our Programs. The Affirmative Action Officer has been assigned responsibility for periodically reviewing progress in the compliance and implementation of the policy of affirmative action. In accordance with public law, the University'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, Monday through Friday, from 9:00 a.m. to 5:00 p.m. upon request.

In addition, employees and applicants will not be subjected to harassment, intimidation, threats, coercion, or discrimination because they have engaged in, or may have engaged in, filing a complaint, assisting or participating in an investigation, compliance review or hearing, or other activity related to the administration of Section 503 of the Rehabilitation Act of 1973, the Vietnam Era Veterans' Readjustment Assistance Act of 1974, Executive Order 11246, all as amended, and/or any other federal, state, or local law or regulation regarding Equal Employment Opportunity, opposing any act or practice made unlawful, or exercising any other right protected by such laws or regulations. Oklahoma State University-Oklahoma City will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with the contractor's legal duty to furnish information.

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Christa Louthan  
Assistant VP/Administration & Finance, Human Resources

**Definitions**  
**41 C.F.R. 60-300.2**

“DISABLED VETERAN” is (1) A veteran of the U.S. military, ground, naval, or air service 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.

“QUALIFIED DISABLED VETERAN” means a disabled veteran as defined above who has the ability to perform the essential functions of the employment position at issue with or without reasonable accommodation.

“RECENTLY SEPARATED VETERAN” means 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.

“ARMED FORCES SERVICE MEDAL VETERAN” is any 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.

“ACTIVE DUTY WARTIME OR CAMPAIGN BADGE VETERAN” means 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.

“PROTECTED VETERANS” means Disabled Veterans, Recently Separated Veterans, Armed Forces Service Medal Veterans, and Active Duty Wartime or Campaign Badge Veterans.

## **Responsibility for Implementation**

### **41 C.F.R. 60-300.44(i)**

Christa Louthan, Assistant VP/Administration & Finance, Human Resources, has overall responsibility for implementation of the Equal Employment Opportunity Policy and the AAP. The University has assigned primary management responsibility and accountability for ensuring full compliance with the Program to Mrs. Melissa Herren. The Affirmative Action Officer, Mrs. Melissa Herren, has the authority, resources, support of and access to top management necessary to ensure the effective implementation of the AAP. The Assistant VP/Administration & Finance, Human Resources actively supports the program and provides assistance whenever it is needed, making managers and supervisors aware of the program and requesting their cooperation and assistance. The identity of the Affirmative Action Officer appears on internal and external communications regarding the University's Equal Employment Opportunity Policy and AAP.

With regard to the University AAP, Christa Louthan works closely with Mrs. Melissa Herren to implement the programs which are specific to the University. Mrs. Melissa Herren, together with the Human Resources staff, has primary responsibility for implementing programs at the University.

The duties of the Affirmative Action Officer and designees include:

- Developing policy statements, AAPs, and internal and external modes of communication
- Overseeing regular discussions with local managers, supervisors, and employees to ensure the University's policies are being followed
- Training personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes to ensure the commitments in the University's affirmative action program are implemented
- Advising supervisors their affirmative action efforts and results are a component of their performance evaluations, and the University is obligated to prevent discrimination and harassment of employees
- Identifying, in conjunction with line management any problem areas in implementing the AAP, and developing solutions
- Identifying any barriers to employment for protected veterans, including those with known disabilities, and assisting managers in developing reasonable accommodations to ensure that individuals with disabilities benefit from equal employment opportunities
- Designing and implementing an internal audit and reporting system that will measure the effectiveness of the University's Program, indicate the need for remedial action, determine the degree to which the University's objectives have been attained, determine whether employees who are protected veterans have had the opportunity to participate in University-sponsored educational, training, recreational, and social activities, and ensure each University location is in compliance with applicable laws and regulations
- Serving as liaison between the University and enforcement agencies, and between the University and organizations of and for protected veterans
- Encouraging active involvement by University representatives in the community service

programs of local organizations of and for protected veterans

- Ensuring posters and notices are properly displayed or disseminated in ways that are accessible and understandable to applicants and employees and
- Keeping management informed of the latest developments in affirmative action.

The responsibilities of managers and supervisors under this AAP include:

- Taking action to prevent the discrimination and harassment of employees
- Ensuring their departments fully comply with the spirit and letter of the affirmative action program and policies
- Reviewing the qualifications of all applicants and employees to make sure qualified individuals are treated in a nondiscriminatory manner with regard to hire, promotion, transfer, and termination
- Reviewing the job performance of each employee to assess whether personnel actions are justified based on the employee's performance of his or her job duties and responsibilities and
- Working with the Affirmative Action Officer or Human Resources Manager and qualified veteran employees or applicants with known disabilities to determine appropriate reasonable accommodations if they are necessary for performance of the job and/or recruitment process.



## **Request for Self-Identification**

**41 C.F.R. 60-300.42**

In order to notify applicants and employees of the existence of and the opportunity to participate in this affirmative action program and to provide sufficient data to allow Oklahoma State University-Oklahoma City to measure and improve, if necessary, the effectiveness of the University's affirmative action efforts, Oklahoma State University-Oklahoma City invites applicants and employees to complete an invitation to self-identify status as a protected veteran as follows:

- When an applicant applies or is considered for employment, the University provides the applicant with a copy of the form attached as Exhibit A, at the same time the University invites the applicant to self-identify race, ethnicity, sex, and disabled status.
- Following an offer of employment but before the individual begins his/her job duties, the University provides an additional copy of the form attached as Exhibit A.

The University keeps all self-identification information confidential and maintains it in a data analysis file rather than in individual employee personnel or medical files.

## **Review of Personnel Policies**

### **41 C.F.R. 60-300.44(b)**

Oklahoma State University-Oklahoma City periodically reviews its personnel procedures to determine whether they ensure the careful, thorough, and systematic consideration of the job qualifications of employees or job applicants who are protected veterans for jobs filled either through vacancy or promotion and for educational or training opportunities. The University ensures that its personnel processes facilitate the implementation of the Affirmative Action Program.

Vacancies are advertised, and applications are accepted from any interested person. Oklahoma State University-Oklahoma City's employment application, the Careers section of its website, and all advertisements include a link to the non-discrimination statement to further assure applicants of the University's policy of equal employment opportunity. An EEO statement will be included in other recruitment literature should the University use such documents in the future. All non-executive positions lasting three days or more not expected to fill from within will be referred to the appropriate state employment service delivery system. In addition, to ensure protected veterans are aware of our openings, the University will send vacancy announcements to the sources listed in the Outreach, Positive Recruitment, and External Dissemination of Policy section of this Affirmative Action Program.

The University ensures its personnel processes do not limit, segregate, or classify an employee or job applicant in a way that adversely affects employment opportunities or status on the basis of status as a protected veteran. The University makes sure when a protected veteran is considered for an employment opportunity, the University relies only on that portion of the individual's military record, including his or her discharge papers, relevant to the requirements of the opportunity at issue. The University periodically reviews any physical and mental job qualifications to ensure they do not tend to screen out disabled veterans for reasons that are not job related or consistent with business necessity, or do not relate to ensuring the safe performance of the essential functions of the job. The University makes any necessary modifications to ensure applicants and employees receive equal opportunity in the operation of all personnel processes, and protected veterans are not stereotyped in a manner that limits their access to jobs for which they are qualified.

The University ensures applicants and employees who are protected veterans and who meet job qualifications have equal access to its personnel process, including those implemented through information and communication technologies, and provides necessary reasonable accommodation to make sure applicants and employees who are disabled veterans receive equal opportunity in the operation of all personnel processes.

## **Review of Physical and Mental Job Requirements**

### **41 C.F.R. 60-300.44(c)**

Oklahoma State University-Oklahoma City reviews physical and mental job qualification requirements as job qualification requirements are established or revised to ensure qualification requirements do not screen out qualified individuals with disabilities or qualified disabled veterans for reasons that are not job related or consistent with business necessity and the safe performance of the essential functions of the job. This review occurs at regular intervals throughout each calendar year, such as when a job may be advertised or filled through hiring or promotion, when the duties of a position are significantly revised, and when considering requests for reasonable accommodation related to the performance of the functions of the position.

Oklahoma State University-Oklahoma City also regularly reviews its personnel processes to ensure any medical exams or inquiries are conducted in accordance with the Section 503 regulations. Information regarding the medical condition or history of an individual obtained as a result of any such inquiry or exam is collected and maintained on separate forms and in separate medical files and treated as a confidential medical record.

To the extent any physical or mental job qualification measurements are found to potentially screen out qualified individuals with disabilities or qualified disabled veterans in the selection of employees or applicants for employment or in other changes in employment status such as promotion or training, Oklahoma State University-Oklahoma City will ensure the requirements are related to the specific job(s) for which the individual is being considered and are consistent with business necessity and the safe performance of the job.

To date, no qualification requirements have been identified that are likely to have a screening effect. All job qualification requirements have been found to be job related, consistent with business necessity, or required for the safe performance of the job.

## Reasonable Accommodations

### 41 C.F.R. 60-300.44(d)

Oklahoma State University-Oklahoma City has made and will continue to make reasonable accommodations, which do not impose undue hardship on its business, to the known physical and mental limitations of otherwise qualified employees and job applicants who are disabled veterans.

Included among the specific accommodations for qualified disabled veterans that may have been implemented are the following:

- Short- and long-term disability programs provide pay for eligible employees absent due to disability.
- A personal leave policy enables eligible employees to accumulate paid time off to be used for medical appointments or personal illness.
- A medical leave of absence may be available to any employee who provides medical documentation of disability, where the requested absence constitutes a reasonable accommodation.
- Adaptive equipment, such as supportive desk chairs, special computer monitors and/or keyboards, is made available when necessary to enable an employee to perform an essential job function.
- Should reasonable accommodations be necessary to facilitate access to work areas by qualified employees or applicants who are known disabled veterans, the University will take reasonable steps to provide such accommodations.
- If necessary to accommodate a veteran with a known disability, the University will remove or alter nonessential job functions, unless doing so creates an undue hardship.
- The University will provide alternative work schedules if needed due to disability where that arrangement constitutes a reasonable accommodation.
- University will accommodate employees who are veterans with known disabilities by allowing a reasonable amount of time off for physicians' visits.
- Special parking for veterans with known disabilities is available at Oklahoma State University-Oklahoma City.
- The University's online application system makes clear to all applicants if they are unable to fully use the automated system, they may follow specified alternate procedures so they receive equal opportunity to apply for and be fully considered for all jobs.
- The University has designed its online application system and its internal information and communication technologies to increase the accessibility of those systems.

If a veteran has a disability, the University encourages the individual to disclose (i) any special methods, skills, and procedures which qualify him or her for positions which he or she might not otherwise be able to do, so that he or she can be considered for any position of that kind, and (ii) the reasonable accommodations which would enable the individual to perform the job properly and safely. Such accommodations may include special equipment, changes in the physical layout of the job, elimination of certain nonessential duties related to the job, or other

reasonable accommodations.

The University informs employees and applicants of its desire to discuss reasonable accommodations in various ways, including through the Policy Statement and on the Invitation to Self-Identify. Both the Policy Statement and the Invitation to Self-Identify are provided to employees and applicants, and posted for employees to view. Individuals interested in discussing accommodations may contact Mrs. Melissa Herren, the Affirmative Action Officer, the Human Resources Department, and/or the individual's supervisor. Managers and supervisors are trained to ensure they know what to do if an employee or applicant makes a request for a reasonable accommodation so that such requests are processed swiftly.

Where an employee who is known to be a veteran with a disability is having significant difficulty performing their job and the University reasonably concludes the performance issues may be related to the known disability, the University may notify the employee of the performance problem and confidentially inquire whether the problem is related to the employee's disability. If the employee indicates their disability is impacting performance, the University will engage in confidential discussions with the employee regarding whether the employee requires reasonable accommodations to improve performance.

**Compensation**  
**41 C.F.R. 60-300.21(i)**

In offering employment or promotions, Oklahoma State University-Oklahoma City does not reduce the amount of compensation offered to protected veterans because of any disability income, pension, or other benefit the employee receives from another source. Similarly, the University does not reduce the amount of compensation offered to an employee or applicant because of the actual or anticipated cost of a reasonable accommodation needed, requested, or anticipated.

## **Internal Communication Procedure**

The University has developed an internal communication procedure whereby all employees, including protected veterans, can raise any issues or claims that may arise during the course of their employment. General communications procedures encourage any and all employees, including protected veterans, to discuss such issues or claims. All matters brought to the attention of the Affirmative Action Officer will be confidentially addressed.

**Harassment**  
**41 C.F.R. 60-300.44(e)**

Oklahoma State University-Oklahoma City has developed and implemented policies and procedures to ensure employees who are protected veterans are not harassed because of their veteran status.

A copy of the University's Equal Employment Opportunity and Affirmative Action Policy Statement forbidding harassment against individuals based on protected characteristics is included in this AAP.



**Training**  
**41 C.F.R. 60-300.44(j)**

The University trains personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes to ensure the commitments in the University's AAP are implemented.

## Internal Dissemination of Policy

### 41 C.F.R. 60-300.44(g)

The University recognizes that, however strong its outreach program, internal support from supervisory management and other employees is necessary to ensure maximum effectiveness of its AAP for protected veterans. So that these employees' awareness of the needs of protected veterans can be increased and employee participation in the program is increased, the University will utilize the following procedures to maximize the internal implementation and dissemination of its Equal Employment Opportunity and Affirmative Action Policy:

- The University includes a copy of the policy statement in its Policy Manual.
- Oklahoma State University-Oklahoma City's policy on equal employment opportunity and affirmative action for protected veterans is posted on University bulletin boards. The posting includes a statement that employees and applicants are protected from coercion, intimidation, and interference or discrimination for filing a complaint or assisting in an investigation under the Vietnam Era Veterans Readjustment Assistance Act of 1974, as amended.
- The University posts a copy of the policy in electronic format in a conspicuous location on the University intranet, along with other employment forms, and otherwise ensures all off-site personnel have a copy of or the ability to view the policy.
- The University's electronic applicant process includes information about the University's commitment to equal employment opportunity and affirmative action.
- The University will communicate to employees its obligation to take affirmative action to employ qualified protected veterans and will encourage employee referral of covered applicants.
- Oklahoma State University-Oklahoma City will invite employees who are protected veterans to participate in the AAP.
- Meetings with executive management and supervisory personnel will be conducted at least annually to explain the University's policy of affirmative action, to make clear the President's support for the policy, and to impart to these personnel their responsibility in making the AAP a success.
- An invitation to participate in Oklahoma State University-Oklahoma City's policy of affirmative action is disseminated to all applicants, as well as to all employees once the University has extended a job offer, but before beginning employment duties.
- When applicable, Oklahoma State University-Oklahoma City publicizes the policy in University publications.
- The policy is discussed in both new employee orientation and management training programs.
- When applicable, University publications include articles on accomplishments of all employees, including protected veterans.

If the University has or becomes party to collective bargaining agreements, union officials will be informed the University is bound by the terms of the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended, and is committed to take affirmative action to employ and advance in employment protected veterans, and the University will not discriminate

against protected veterans. For those sites not subject to a collective bargaining agreement, no notification of union officials is necessary.

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

### **41 C.F.R. 60-300.44(f)**

Oklahoma State University-Oklahoma City has reviewed its employment practices to determine whether its personnel programs are designed to effectively recruit and advance in employment protected veterans. While the University believes there are no deficiencies in its current employment practices with respect to applicants and employees who are protected veterans, it engages in outreach, positive recruitment, and external dissemination programs to augment its existing affirmative efforts. For example, the University sends written notification of its affirmative action policy to all subcontractors, including subcontracting vendors and suppliers, and requests appropriate action on their part. In addition, the University engages in or has made plans to implement the following activities:

- Oklahoma State University-Oklahoma City makes the Equal Employment Opportunity Clause part of all covered contracts and purchase orders.
- The University posts all job vacancies (other than some executive and senior management positions or positions lasting three days or less) for which it considers outside applicants with the state workforce agency job bank or local employment delivery system where the opening occurs. These postings occur before or concurrently with the use of other recruitment efforts to fill the job and are provided in the manner and format specified by the relevant agency that will allow the agency to provide priority referral of protected veterans.
- Oklahoma State University-Oklahoma City has notified the employment service delivery system in each state where it has establishments that it is a federal contractor and it desires priority referrals of protected veterans for job openings in that state. The University also provided the employment service delivery system with the name and location of all hiring locations within the state and the contact information for an employee who can answer questions about such job listings. The notice also included the names and contact information for job search organizations the University uses to assist in hiring, if any. If any of the information in this disclosure changes, the University sends an update with the next relevant job listing.
- Executives, management officials, supervisors, and other employees of the University are encouraged to assist in the effort to disseminate Oklahoma State University-Oklahoma City's policy of affirmative action to appropriate individuals outside of the University.
- The University will inform recruiting sources of Oklahoma State University-Oklahoma City's policy of affirmative action for protected veterans. Recruiting sources will be requested to actively recruit and refer qualified protected veterans for all positions.
- Oklahoma State University-Oklahoma City will identify local organizations and/or community agencies known to specialize placing and/or developing training programs for protected veterans and send them notices of vacant positions. Examples of these outreach efforts include contacting the following:
  - Veterans' Employment Representative in the employment service center near the facilities covered in this AAP
  - Department of Veterans Affairs Regional office near the facilities covered in this AAP

- Veterans' coordinators on campuses where the University normally recruits
- Other recruitment sources that specialize in placement of protected veterans
- When appropriate, the University will invite community service and other outreach partners to tour the office and discuss the University, job recruitment needs, selection process, and other details related to recruitment and placement. In the event a partner is unable to schedule an on-site meeting, the University will suggest a telephone meeting so they can better identify qualified individuals for our positions.
- When the University recruits at colleges and universities, it will incorporate efforts to reach students who are protected veterans.
- Oklahoma State University-Oklahoma City will seek to include protected veterans when employees are pictured in consumer and personnel recruitment advertising.
- Oklahoma State University-Oklahoma City makes reasonable accommodations for qualified veterans with disabilities.
- Oklahoma State University-Oklahoma City advertisements or solicitations for prospective employees indicate that the University is an equal opportunity employer.
- As described in more detail in Exhibit C, Oklahoma State University-Oklahoma City evaluates the effectiveness of its outreach and recruitment efforts to determine if its affirmative action objectives are being met, and makes appropriate changes.

## **Data Collection Analysis**

### **41 C.F.R. 60-300.44(k)**

Oklahoma State University-Oklahoma City documents computations or comparisons pertaining to applicants and hires on an annual basis and maintains the documentation for a period of three years. A copy of our data collection analysis for the period of November 01, 2018 to October 31, 2019 follows:

## **Hiring Benchmarks**

### **41 C.F.R. 60-300.45**

In establishing a hiring benchmark, the following principles apply:

- The purpose of establishing a hiring benchmark is to provide the University with a quantifiable method by which it can measure its progress toward achieving equal employment opportunity for protected veterans.
- The hiring benchmark is not a quota that must be met, nor is it a ceiling that limits or restricts the employment of protected veterans.
- In all employment decisions, the University makes selections in a nondiscriminatory manner. Hiring benchmarks do not provide a justification to extend a preference to any individual, select an individual, or adversely affect an individual's employment status, on the basis of that individual's veteran status.
- Hiring benchmarks do not create set-asides for specific groups, nor are they intended to achieve proportional representation or equal results.
- Hiring benchmarks are not used to supersede merit selection principles, nor do they require the University to hire a person who lacks qualifications to perform the job successfully or hire a less qualified person in preference to a more qualified one.
- A finding that the hiring benchmark has not been attained does not constitute either a finding or admission of discrimination.

Oklahoma State University-Oklahoma City has established its benchmark in accordance with the national percentage of veterans in the civilian labor force as published on the OFCCP website. As of November 01, 2019, this benchmark percentage is 0 percent.

## **Monitoring and Reporting Systems**

### **41 C.F.R. 60-300.44(h)**

It is the responsibility of the University's Affirmative Action Officer to monitor employment and personnel practices to ensure compliance with applicable regulations and adherence to the University's Statement of Policy, to report specific problems to the appropriate management personnel, and to measure the effectiveness of Oklahoma State University-Oklahoma City's AAP.

The University's audit and reporting system is designed and implemented to:

- Measure the effectiveness of the AAP
- Identify any need for remedial action
- Determine the degree to which the University's objectives are being attained
- Determine whether individuals who are known protected veterans have had the full opportunity to participate in all University sponsored educational, training, recreational and social activities
- Measure the University's compliance with the AAP's specific obligations, and
- Document the actions taken to monitor the University's compliance with the AAP's specific obligations.

In order to measure the effectiveness of the AAP, the University may take the following actions:

- Audit its voluntary self-identification process to monitor the number of protected veterans who choose to self-identify and evaluates whether changes could be made to University's self-identification process to encourage greater voluntary self-identification by protected veterans
- Establish a hiring benchmark to measure its progress towards achieving equal employment opportunity for protected veterans
- Review available data computations and analyses regarding applicants and hires
- Review the effectiveness of its recruitment and outreach activities
- Regularly assess its personnel processes to ensure that protected veterans have equal opportunity in employment
- Use a schedule to regularly assess any mental and physical qualifications to ensure that they are job-related and consistent with business necessity
- Audit its communications with vendors and subcontractors to ensure that such communications reflect the University's commitment to equal employment opportunity and affirmative action for protected veterans
- Audit its communications with applicants and employees to ensure that such communications reflect the University's commitment to equal employment opportunity and affirmative action for protected veterans
- Audit its job listings to ensure that the postings reflect the University's commitment to equal employment opportunity and affirmative action for protected veterans, and



- Audit its personnel policies to ensure that such policies reflect the University's commitment to equal employment opportunity and affirmative action for protected veterans.

Where the affirmative action program is found to be deficient, the University shall endeavor to undertake necessary action to bring the program into compliance.

## **List of Exhibits**

Exhibit A - Voluntary Veteran Self-Identification Form: Pre and Post Offer Solicitation

Exhibit B - Annual Notification to Vendors

Exhibit C – Annual Assessment of Outreach and Recruiting Efforts

## Exhibit A - Voluntary Veteran Self-Identification Form: Pre and Post Offer Solicitation

Name: \_\_\_\_\_ Date: \_\_\_\_\_

**This employer is a government contractor subject to the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended (VEVRAA), which requires government contractors to take affirmative action to employ and advance in employment:**

- (1) disabled veterans;**
- (2) recently separated veterans;**
- (3) active duty wartime or campaign badge veterans;**
- (4) Armed Forces service medal veterans;**

These classifications are defined as follows:

- A “disabled veteran” is one of the following:
  - a veteran of the U.S. military, ground, naval, or air service 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**
  - a person who was discharged or released from active duty because of a service-connected disability
- A “recently separated veteran” means 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
- An “active duty wartime or campaign badge veteran” means a veteran who served on active duty in the U.S. military, ground, naval, or air service during a period of war outlined in 38 U.S.C. Section 101, or in a campaign or expedition for which a campaign badge has been authorized under the laws administered by the Department of Defense
- An “Armed Forces service medal veteran” means 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

If you believe you belong to any of the categories of protected veterans listed above, please indicate by checking the appropriate box below. Your Form DD-214 may help you make this determination. As a government contractor subject to VEVRAA, we request this information in order to measure the effectiveness of the outreach and positive recruitment efforts we undertake pursuant to VEVRAA. Submission of this information is voluntary and refusal to provide it will not subject you to any adverse treatment. The information provided will be maintained confidentially and used only in ways that are consistent with VEVRAA.

I identify as one or more of the classifications of protected veterans listed above

I am not a protected veteran.

I decline to disclose my protected veteran status.

If you are disabled veteran, please let us know if there any reasonable accommodations we could make that would enable you to be considered for a job opening or perform the essential functions of the position you hold. We consider requests for accommodation on a case-by-case basis.

## Exhibit B - Annual Notification to Vendors

To Whom It May Concern:

This letter is to inform you Oklahoma State University-Oklahoma City is committed to the principles of equal employment opportunity. Moreover, as a government contractor subject to by Executive Order 11246, as amended, the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended, and Section 503 of the Rehabilitation Act of 1973, as amended, Oklahoma State University-Oklahoma City takes its affirmative action obligations very seriously. Oklahoma State University-Oklahoma City states as its Policy of Affirmative Action the following:

- It will be the policy of Oklahoma State University-Oklahoma City not to discriminate on the basis of sex, gender identity, sexual orientation, race, color, religious creed, national origin, physical or mental disability, protected veteran status, or any other characteristic protected by applicable law. This policy applies to all recruitment, hiring, training, and promotion decisions for all job titles.
- All employment decisions shall be consistent with the principle of equal employment opportunity, and only job related qualifications will be required.
- All personnel actions, such as compensation, benefits, transfers, tuition assistance, social and recreational programs, etc. will be administered without discrimination on the basis of sex, gender identity, sexual orientation, race, color, religious creed, national origin, physical or mental disability, protected veteran status, or any other characteristic protected by applicable law.

As a vendor or subcontractor, you are notified you may be subject to the regulations implementing Executive Order 11246, as amended, the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended, and Section 503 of the Rehabilitation Act of 1973, as amended, including: 41 CFR Section 60-300.5(a); 41 CFR Section 60-741.5(a); 41 CFR Section 60-1.4(a) and (c); 41 CFR Section 60-1.7(a); 41 CFR Part 60-2, 48 CFR Section 52.222-54(e); and 29 CFR Part 471, Appendix A to Subpart A with respect to affirmative action program and posting requirements.

As applicable, you shall abide by these requirements which require that covered entities not discriminate and take affirmative action on the basis of sex, gender identity, sexual orientation, race, color, religious creed, national origin, physical or mental disability, and protected veteran status.

To assure compliance with the University's AAP, Mrs. Melissa Herren, Affirmative Action Officer, has been designated to administer and monitor the Program and make reports to Senior Management.

## **Exhibit C – Annual Assessment of Outreach and Recruiting Efforts**

Oklahoma State University-Oklahoma City evaluates available data regarding the effectiveness of its outreach and recruitment efforts on an annual basis. For areas where the University concludes the totality of its efforts were not effective in identifying and recruiting qualified protected veterans, Oklahoma State University-Oklahoma City will identify and implement alternative efforts.

Criteria used to evaluate the effectiveness of outreach efforts may include:

- Available data regarding applicants and hires, including the Oklahoma State University-Oklahoma City's established veteran hiring benchmark.
- Whether the activity expanded Oklahoma State University-Oklahoma City's outreach to protected veterans.
- Whether the activity increased the University's ability to include protected veterans in its workforce.
- Whether the activity attracted qualified protected veterans.
- Whether the activity resulted in the selection of qualified protected veterans.

The University will continue to monitor and review outreach sources to evaluate the effectiveness of outreach and recruitment efforts.