

EXECUTIVE ORDER 11246 AFFIRMATIVE ACTION PLAN (AAP)

for

**THE CALIFORNIA STATE UNIVERSITY
OFFICE OF THE CHANCELLOR**

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July 1, 2020 - June 30, 2021

PART I: AAP FOR MINORITIES AND WOMEN

**PART II: AAP FOR PROTECTED VETERANS
AND INDIVIDUALS WITH DISABILITIES**

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**THE CHANCELLOR’S OFFICE AAP
FOR PLANNAME**

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INTRODUCTION TO PARTS I AND II

BACKGROUND

The California State University Office of the Chancellor serves as the headquarters for the 23-campus CSU system. The CSU has one of the most diverse student bodies in the United States and educates over 400,000 students every year.

The Chancellor's Office is a federal government supply and service contractor subject to the affirmative action requirements of Executive Order 11246, the Rehabilitation Act of 1973 as amended, and the Vietnam Era Veterans' Readjustment Assistance Act of 1974, Section 4212. Because the Chancellor's Office has \$50,000 or more in annual contracts with the federal government and employs 50 or more employees, we are required to prepare annual written Affirmative Action Plans (AAP's) for minorities and women, for protected veterans, and for individuals with disabilities for our organization. Failure to comply with these laws and their implementing regulations, which are enforced by the Office of Federal Contract Compliance Programs (OFCCP), can result in debarment of the Chancellor's Office from future contracts and subcontracts.

Affirmative action is a term that encompasses any measure adopted by an employer to correct or to compensate for past or present discrimination or to prevent discrimination from recurring in the future. Affirmative action goes beyond the simple termination of a discriminatory practice.

As stipulated in federal regulations, a prerequisite to the development of a satisfactory affirmative action plan is the evaluation of opportunities for protected group members, as well as an identification and analysis of problem areas inherent in their employment. Also, where a statistical analysis reveals a numeric disparity between incumbency and availability (and/or hiring rates for veterans), an adequate AAP details specific affirmative action steps to guarantee equal employment opportunity. These steps are keyed to the problems and needs of protected group members. For minorities and women, such steps include the development of hiring and promotion goals to rectify the disparity between incumbency and availability. For protected veterans and individuals with disabilities, such steps will include a thorough review of the Chancellor's Office's outreach efforts to determine the effectiveness of such efforts in closing the hiring and/or utilization gaps. It is toward this end that the following AAP of the Chancellor's Office was developed.

APPLICABLE AFFIRMATIVE ACTION LAWS AND REGULATIONS

The Chancellor's Office's AAP for minorities and women (Part I) has been prepared according to Executive Order No. 11246, as amended, and Title 41, Code of Federal Regulations, Part 60-1 (Equal Employment Opportunity Duties of Government Contractors), Part 60-2 (Affirmative Action Programs of Government Non-Construction Contractors; also known as "Revised Order No. 4"), and Part 60-20 (Sex Discrimination Guidelines for Government Contractors).

The Chancellor's Office has developed separately an affirmative action plan for protected veterans and individuals with disabilities (Part II) prepared in accordance with the Rehabilitation Act of

1973, Section 503, as amended and Title 41, Code of Federal Regulations, Part 60-741(Affirmative Action Program for Individuals with Disabilities), the Vietnam Era Veterans' Readjustment Assistance Act of 1974, Section 4212, as amended, and Title 41 Code of Federal Regulations, Part 60-300 (Affirmative Action Program for protected veterans).

Under [Section 503](#), a business with a federal contract of more than \$15,000 is required to treat qualified individuals with disabilities without discrimination on the basis of their physical or mental disability in all employment practices, and to take affirmative action to employ and advance in employment individuals with disabilities. If the Chancellor's Office has at least 50 employees and a single contract of \$50,000 or more, then it must also develop a Section 503 AAP, as described in [41 CFR 60-741, Subpart C](#). Section 503 applies to businesses with federal construction contracts, but not to businesses with federally assisted construction contracts.

Under [VEVRAA](#), a business with a federal contract of \$150,000 or more is required to treat qualified individuals without discrimination based on their status as a protected veteran in all employment practices, and to take affirmative action to employ and advance in employment protected veterans. If the Chancellor's Office has at least 50 employees and a single contract of \$150,000 or more, then it must also develop a VEVRAA AAP, as described in [41 CFR 60-300, Subpart C](#). VEVRAA applies to businesses with federal construction contracts, but not to businesses with federally assisted construction contracts.

COVERED GROUPS UNDER AFFIRMATIVE ACTION LAWS AND REGULATIONS

Coverage under affirmative action laws and regulations applies to:

Women and minorities who are recognized as belonging to or identifying with the following race or ethnic groups: Blacks/African Americans, Hispanics/Latinos, Asian, American Indian or Alaskan Native employees, Native Hawaiian or Pacific Islander, and Two or More races.

Any veteran 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 who was discharged or released from active duty because of a service-connected disability.

Recently separated veterans: any veteran currently within three-years of discharge or release from active duty.

Veterans who served on active duty in the U.S. military during a war or campaign or expedition for which a campaign badge is awarded.

Veterans who, while serving on active duty in the Armed Forces, participated in a United States military operation for which an Armed Forces service medal was awarded pursuant to Executive Order 12985.

An individual with a disability: 1) a person who has a physical or mental impairment that

substantially limits one or more of his/her major life activities; (2) has a record of such impairment, or (3) is regarded as having such an impairment.

PROGRAM TERMINOLOGY

The terms, "comparison of incumbency to availability," "deficiency," and "problem area," appearing in this AAP, are terms the Chancellor's Office is required by government regulations to use. The criteria used in relation to these terms are those specified by the government. These terms have no independent legal or factual significance whatsoever. Although the Chancellor's Office will use the terms in total good faith in connection with its AAP, such use does not necessarily signify that the Chancellor's Office agrees that these terms are properly applied to any particular factual situation and is not an admission of non-compliance with EEO laws, regulations, and objectives.

The comparison of incumbency to availability contained herein is required by Government regulations to be based on certain statistical comparisons. Geographic areas and sources of statistics used herein for these comparisons were used in compliance with Government regulations, as interpreted by Government representatives. The use of certain geographic areas and sources of statistics does not indicate the Chancellor's Office's agreement that the geographic areas are appropriate in all instances of use or that the sources of statistics are the most relevant. The use of such geographic areas and statistics may have no significance outside the context of this AAP. Such statistics and geographic areas will be used, however, in total good faith with respect to this AAP.

The grouping of job titles into a given job group does not suggest that the Chancellor's Office believes the jobs so grouped are of comparable worth.

Whenever the term "goal" is used, it is expressly intended that it "should not be used to discriminate against any applicant or employee because of race, color, religion, gender, or national origin," as stated in Title 41 Code of Federal Regulations, Part 60-2.16(e)(2).

This AAP is not intended to create any contractual or other rights in any person or entity.

RELIANCE ON EEOC'S GUIDELINES

Although the Chancellor's Office does not believe any violation of Title VII of the Civil Rights Act exists, it has developed this AAP in accordance with and in reliance upon the EEOC's Guidelines on Affirmative Action, Title 29 Code of Federal Regulations, Part 1608.

REPORTING PERIOD

This AAP is designed to cover the following reporting period,

- AAP implementation period: July 1, 2020 through June 30, 2021
- Transaction period: May 1, 2019 to April 30, 2020

STATEMENT OF PURPOSE FOR PARTS I AND II

This AAP has been designed to bring women and men, members of minority groups, protected veterans, and individuals with disabilities into all levels and segments of the Chancellor's Office's workforce in proportion to their representation in the qualified relevant labor market.

The AAP, therefore, is a detailed, results-oriented set of procedures which, when carried out, results in full compliance with equal employment opportunity requirements through the equal treatment of all people.

The manner in which this is to be accomplished becomes technical and somewhat complicated. There are several reasons for this. First, the Chancellor's Office is subject to and must address a variety of State and Federal laws and guidelines dealing with equal employment opportunity and affirmative action. These guidelines and requirements are in themselves somewhat technical and complex. In addition, relevant court decisions, which are often useful in interpreting, but sometimes conflicting with these requirements and guidelines, must be taken into account when developing and implementing the AAP. Furthermore, in determining the Chancellor's Office's current equal employment opportunity and affirmative action position and its desired future achievements, numbers, percentages, statistics, and numerous calculations and computations must come into play.

The technical, legal, and mathematical aspects of the AAP, however, all have one common purpose—to allow us to properly identify three key concepts:

1. Where we stand now,
2. Where we must go,
3. How best to get there.

These three concepts are the Affirmative Action Plan.

**THE CALIFORNIA STATE UNIVERSITY
OFFICE OF THE CHANCELLOR**

PART I: AFFIRMATIVE ACTION PLAN FOR MINORITIES AND WOMEN

FOR

JULY 1, 2020 - JUNE 30, 2021

PART I

AAP FOR MINORITIES AND WOMEN

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PART I: AAP FOR MINORITIES AND WOMEN

CHAPTER 1: ORGANIZATIONAL PROFILE

41 C.F.R. § 60-2.11

Workforce Analysis/Lines of Progression

The Chancellor's Office conducted a workforce analysis to identify employees by gender and race/ethnicity in each job title. The data was collected from payroll records dated May 1, 2020.

Job titles are listed by organizational unit. Job titles are listed from lowest to highest paid. The list includes all job titles, including departmental supervision, exempt, and nonexempt titles.

For each job title, the Chancellor's Office identified the total number of employees, the number of male and female employees, the total number of minority employees, the male and female minority employees, the total number of employees who are White, Black, Hispanic, Asian, American Indian or Alaskan Native employees, Native Hawaiian or Pacific Islander, and Two or More races, and the male and female employees within each of these race/ethnic groups.

Lines of Progression

Developed in conjunction with the workforce analysis is information on the Chancellor's Office's lines of progression. Lines of progression (career ladders/career paths) identify the job titles through which an employee can move to the top of a line. For each line of progression, applicable departments are identified. These are the departments which employ persons in the job titles in the specified line of progression. Some lines of progression are limited to only one department, while others are found throughout several departments.

The lines of progression provide useful information regarding patterns of vertical and horizontal movement throughout our workforce. These patterns will be evaluated to ascertain whether they provide to our employees the optimum career mobility and opportunities for advancement.

See the *Workforce Analysis/Lines of Progression* for the results per organizational unit.

CHAPTER 2: JOB GROUP ANALYSIS

41 C.F.R. § 60-2.12

Although the workforce analysis was conducted individually for every job title, after it was completed, job titles were grouped for the comparison of incumbency to availability and for setting goals. There were several reasons for grouping jobs.

Many job titles are so similar in content that handling them individually in the AAP is not necessary. Grouping together these very similar titles is appropriate for the comparison of incumbency to availability. For many job titles, the availability data that can be collected is limited, and the same data must be used for several related jobs. Therefore, grouping these related titles together is logical. Also, many job titles have so few incumbents in them that identifying disparities between incumbency and availability by job title is meaningless—as problem areas would be identified in terms of fractions of people. By grouping several similar titles and increasing the number of employees involved, a meaningful comparison can be conducted; any identified problem areas are more likely to be in terms of whole people. Consequently, goals established to correct problem areas are also more likely to be in terms of whole people.

The three reasons for grouping job titles all discuss "similar" or "related" jobs. That is the most critical guideline in creating job groups. Above all, the job titles placed into a job group must be more similar or related to each other than the job titles in other job groups.

Job groups must have enough incumbents to permit meaningful comparisons of incumbency to availability and goal setting. Ideally, if a job group is identified as containing a problem area, it should be large enough that a goal of a least one whole person can be established. No minimum size has been established for this purpose, however, since it is dependent not only on the size of the job group, but also on the size of the availability percentage and the number of minorities or women already employed in the job group.

It may not be possible for a smaller contractor's job groups to meet the guideline of not crossing EEO categories. While there are usually two or more job groups within each EEO-1 or EEO-6 category, for smaller contractors some or all of their job groups may correspond to EEO categories.

The Chancellor's Office did not combine job titles with different content, wages, or opportunities if doing so would have obscured problem areas (e.g., job groups which combine jobs in which minorities or women are concentrated with jobs in which they are underrepresented).

CHAPTER 3: PLACEMENT OF INCUMBENTS IN JOB GROUPS
41 C.F.R. § 60-2.13

Each job group appears on a Job Group Report with a job group name and number. The report lists each job title in the job group. For each job title, the worksheet provides the following information: EEO reporting category, job title, employee headcounts for each job title, and overall percentages by gender and race/ethnicity as of May 1, 2020.

See the *Job Group Analysis* for the listing of the job titles and the associated race and gender headcounts per job group.

CHAPTER 4: DETERMINING AVAILABILITY

41 C.F.R. § 60-2.14

"Availability" is an estimate of the proportion of each sex and race/ethnic group available and qualified for employment at the Chancellor's Office for a given job group in the relevant labor market during the life of the AAP. Availability indicates the approximate level at which each race/ethnic and sex group could reasonably be expected to be represented in a job group if the Chancellor's Office's employment decisions are being made without regard to gender, race, or ethnic origin. Availability estimates, therefore, are a way of translating equal employment opportunity into concrete numerical terms. Correct comparisons of incumbency to availability, worthwhile and attainable goals, and real increases in employment for problem groups depend on competent and accurate availability analyses. With valid availability data, we can compare the percentages of those who could reasonably be expected to be employed versus our current employment (from the workforce analysis), identify problem areas or areas of deficiency, and establish goals to correct the problems.

Steps in Comparison of Incumbency to Availability

Identify Availability Factors

The following availability factors are required of federal government contractors for consideration when developing availability estimates for each job group:

1. External Factor: The external requisite skills data comes from the 2006-2010 American Community Survey (ACS) Census of Population data.
 - A. Local labor area: An employee Zip Code Analysis was used to identify the most precise local labor area for the Chancellor's Office. The final local labor area met the following two (2) conditions: 1) it includes all counties/county sets where 5% or more of the employees/applicants resided, and 2) when summed, those counties/county sets accounted for at least 78% of the total applicants/employees within the at-issue workforce. Smaller contributing counties/county sets are removed (i.e., trimmed) unless they are necessary to reach 78%. Once trimmed, the weights for the remaining counties/county sets were proportionately increased to reach 100%.
 - B. Reasonable labor area: The reasonable recruitment area is the geographic area external to the Chancellor's Office from which the Chancellor's Office typically recruits or draws job applicants for positions in the group. Where a reasonable recruitment area has been identified, National data are used to represent such recruitment efforts.
2. Internal Factor: The percentage of minorities or women among those promotable, transferable, and trainable within the contractor's organization. See the *Internal Availability Analysis* for more detail.

Assign Internal and External Factor Weights: Weights were assigned to each factor for each job group. A combination of historical data and experience were used to determine the weights. Weights were never assigned in an effort to hide or reduce problem areas.

Identify Final Availability: Weights were multiplied by the component-specific data to produce weighted data for each component. Weighted data for each component was summed. This produced a final availability estimate for each sex and race/ethnic group, as well as for minorities in the aggregate.¹

See the *Availability Analysis* for the availability breakdown for each job group.

¹ In most cases, the final availability report (and most other technical reports in this AAP) only includes data/information for females and minorities in the aggregate.

CHAPTER 5: COMPARING INCUMBENCY TO AVAILABILITY
41 C.F.R. § 60-2.15

Once final availability estimates were made for each job group, the Chancellor's Office compared the percentage of incumbents in each job group to their corresponding availability. A comparison was made between the percentage employed as of May 1, 2020 and that group's final availability.

See the *Comparison of Incumbency to Availability* for the results per job group.

CHAPTER 6: PLACEMENT GOALS

41 C.F.R. § 60-2.16

The Chancellor's Office has established an annual percentage placement goal whenever it found that minority or female representation within a job group was less than would reasonably be expected given their availability. In each case, the goal was set at the availability figure derived for women and/or minorities, as appropriate for that job group. These goals take into account the availability of basically qualified persons in the relevant labor area. They also take into account anticipated employment opportunities with our organization. Goals are not rigid and inflexible quotas which must be met, but are instead targets reasonably attainable by means of applying every good faith effort to make all aspects of the entire AAP work. These goals will be reached primarily through recruiting and advertising to increase the pool of qualified minority and female applicants and through implementation of our action-oriented programs (see Chapter 9). Selections will occur only from among qualified applicants. Goals do not require the hiring of a person when there are no vacancies or the hiring of a person who is less likely to do well on the job ("less qualified") over a person more likely to do well on the job ("better qualified"), under valid selection procedures. Goals do not require that the Chancellor's Office hire a specified number of minorities or women.

A goal is a guidepost against which the Chancellor's Office, a community group, or a compliance agency can measure progress in remedying identified deficiencies in the Chancellor's Office's workforce. By setting realistic goals, the Chancellor's Office should be able to meet the goals, assuming we conduct effective recruitment and advertising efforts to ensure an adequate pool of qualified minority and/or female applicants.

See the *Placement Goals* report for each job group and the *Goals Progress Report* for progress made since the previous AAP.

CHAPTER 7: DESIGNATION OF RESPONSIBILITY
41 C.F.R. § 60-2.17(a)

As part of its efforts to ensure equal employment opportunity to all individuals, the Chancellor's Office has designated specific responsibilities to various staff to ensure the AAP focuses on all components of the employment system. To that end, the Chancellor, the Vice Chancellor for Human Resources, the Assistant Vice Chancellor, Workforce Strategies & Chancellor's Office Human Resources, the Senior Director, Chancellor's Office Human Resources, the Associate Director, HR, Talent Acquisition and Workforce Planning, and those employed as supervisors and managers have undertaken the responsibilities described below.

Chancellor

The primary responsibility and accountability for implementing the AAP rests with the Chancellor. This person is responsible, through the Vice Chancellor for Human Resources, Assistant Vice Chancellor, Workforce Strategies & Chancellor's Office Human Resources, Senior Director, Chancellor's Office Human Resources, and Associate Director, HR, Talent Acquisition and Workforce Planning, for adherence to the Chancellor's Office's policy of equal employment opportunity and affirmative action. This role includes, but is not limited to, the following duties:

1. Designate appropriate personnel with the responsibility for overseeing, administering, implementing, and monitoring the Chancellor's Office's AAP. Ensure that these personnel are identified in writing by name and job title.
2. Ensure that those designated personnel responsible for all AAP components are given the necessary authority and top management support and staffing to successfully implement their assigned responsibilities.
3. Impart the personal direction that ensures total involvement and commitment to equal employment opportunity programs through the Chancellor's Office's AAP.

Vice Chancellor for Human Resources and Assistant Vice Chancellor, Workforce Strategies & Chancellor's Office Human Resources

The Vice Chancellor for Human Resources and Assistant Vice Chancellor, Workforce Strategies & Chancellor's Office Human Resources are responsible for overall supervision of the AAP and ensure, through the Senior Director, Chancellor's Office Human Resources, the Associate Director, HR, Talent Acquisition and Workforce Planning, and department managers and supervisors, that all relevant policies and procedures are adhered to. Successful implementation of this program is a basis for evaluating the Senior Director, Chancellor's Office Human Resources, and the Associate Director, HR, Talent Acquisition and Workforce Planning' effective work performance. Responsibilities include, but are not limited to, the following:

1. Ensure that the Chancellor's Office adheres to the stated policy of equal employment opportunity, and monitor the application of equal employment opportunity policies.

2. Ensure that the AAP is reviewed and updated annually in accordance with the Chancellor's Office's stated policy.
3. Participate in periodic discussions with management, supervision, and all other employed personnel to ensure AAP and equal employment opportunity policies are being followed.
4. Ensure that all new employees receive a special orientation to the Chancellor's Office's equal employment opportunity policy and are thoroughly informed with regard to the AAP and its objectives.
5. Ensure that recruitment advertising is placed in minority and female-oriented publications, as applicable.
6. Responsible for the design and effective implementation of the AAP at all establishments.

Senior Director, Chancellor's Office Human Resources, and Associate Director, HR, Talent Acquisition and Workforce Planning

The Senior Director, Chancellor's Office Human Resources, and the Associate Director, HR, Talent Acquisition and Workforce Planning are responsible for ensuring the directives of the Chancellor, the Vice Chancellor for Human Resources, and the Assistant Vice Chancellor, Workforce Strategies & Chancellor's Office Human Resources are implemented. The duties of the Senior Director, Chancellor's Office Human Resources, and Associate Director, HR, Talent Acquisition and Workforce Planning include, but are not limited to, the following:

1. Provide direction to the Chancellor's Office's employees, as necessary, to carry out all actions required to meet the Chancellor's Office's equal employment opportunity and affirmative action commitments.
2. Review, report on, and update the Chancellor's Office's AAP at least on an annual basis in accordance with stated policy.
3. Develop, implement, and maintain audit and reporting systems to measure effectiveness of equal employment opportunity programs, including those that will indicate the need for remedial action and determine the degree to which goals and objectives have been obtained.
4. Advise management in the modification and development of the Chancellor's Office's policies to ensure the enhancement of equal employment opportunity for all employees and potential employees within existing equal employment opportunity guidelines.
5. Conduct periodic audits to ensure all required posters and those advertising the Chancellor's Office's equal employment opportunity policies and AAP are displayed and that the Chancellor's Office's equal employment opportunity and AAP policies are being thoroughly communicated.

6. Assist in review and revision of all policies, procedures, and rules to ensure they are not in violation of federal or state laws and regulations.
7. Review the qualifications of all employees to ensure equitable opportunity, based on job-related employment practices, is given to all for transfers and promotions.
8. Conduct periodic audits of: 1) training programs and hiring and promotion patterns to remove impediments to the attainment of AAP goals and objectives, 2) facilities to ensure they are maintained for the use and benefit of all employees and integrated both in policy and practice, and 3) sponsored educational, training, recreational, and social activities to ensure that all employees are encouraged to participate in accordance with policies on non-discrimination.
9. Periodically analyze applicant flow to determine the mix of persons applying for employment by race/ethnic origin and gender.
10. Review all job descriptions and specifications to ensure they are free of discriminatory provisions and artificial barriers. Ensure that all requirements are job-related, that they are realistic, and that they reflect the actual work requirements of the essential job duties.

Managers and Supervisors

In their direct day-to-day contact with the Chancellor's Office's employees, managers and supervisors have assumed certain responsibilities to help the Chancellor's Office ensure compliance with equal employment opportunity programs and effective implementation of the AAP. These include, but are not limited to, the following:

1. Aggressively adhere to the Chancellor's Office's equal employment opportunity and affirmative action policy.
 - A. Support and assist the Vice Chancellor for Human Resources, the Assistant Vice Chancellor, Workforce Strategies & Chancellor's Office Human Resources, the Senior Director, Chancellor's Office Human Resources, and the Associate Director, HR, Talent Acquisition and Workforce Planning in developing, maintaining, and successfully implementing the AAP.
 - B. Complete progress reports regarding the status of goal achievement.
 - C. Take action to prevent harassment of employees placed through affirmative action efforts.
2. Assign employees to significant jobs that might lead to greater personal growth and value, and counsel them with respect to what is needed for upward mobility within the employment structure.
3. Ensure that all interviews, offers of employment and/or wage commitments are consistent with the Chancellor's Office's policy.

4. Implement the internal promotion and transfer of all employees under their supervision consistent with AAP goals and objectives.
5. Assist in identifying problem areas and provide needed information for establishing and meeting department affirmative action goals and objectives.

CHAPTER 8: IDENTIFICATION OF PROBLEM AREAS
41 C.F.R. § 60-2.17(b)

Terminology

The phrases “comparison of incumbency to availability,” and “problem area” appearing in this chapter are terms the Chancellor’s Office is required by government regulations to use. The criteria used in relation to these terms are those specified by the government. These terms have no independent legal or factual significance. Although the Chancellor’s Office will use the terms in good faith in connection with its AAP, such use does not necessarily signify the Chancellor’s Office agrees that these terms are properly applied to any particular factual situation and is not an admission of non-compliance with EEO laws, regulations, and objectives. Whenever the term “goal” is used, it is expressly intended that it “should not be used to discriminate against any applicant or employee because of race, color, religion, gender, or national origin,” as stated in Title 41 Code of Federal Regulations, Part 60-2.16I.

In addition to comparing incumbency to availability within job groups, the Chancellor’s Office has conducted studies to identify problem areas in each of its selection procedures (i.e., hires, promotions, and terminations). The Chancellor’s Office will continue to monitor and update these studies during each AAP year. In each case where potential problem areas have been identified, affirmative actions, as appropriate, will be taken consistent with any of the action-oriented programs described in Chapter 9 of this AAP.

Goals are established within each of the job groups at no less than the current availability data for the job group.

The results of the analyses for each job group are discussed below. In addition to comparing incumbency to availability within job groups, the Chancellor’s Office has conducted studies to identify problem areas in each of its selection procedures (i.e., hires, promotions, and terminations) as well as by organizational unit.

Goals were established within each of the job groups at no less than the current availability data for the job group.

The analysis of minority and female utilization within each job group was accomplished by a thorough investigation of the Comparison of Incumbency to Availability reports. See the Comparison of Incumbency to Availability reports for each job group.

Results of the analysis are as follows:

41 C.F.R. § 60-2.16 Placement Goals

In the 2020/2021 AAP, Females were underutilized in the A4 - Admin Mgmt III job group. There was a shortfall of four women in this job group.

In addition, the African Americans were underutilized in the A2 - Admin Mgmt IV, and A4 - Admin Mgmt III job groups. There was a shortfall of one African American in each job group.

Progress Towards Prior-Year Goals for Females and Minorities

In the previous 2019/2020 AAP the following placement goals were identified:

Females: 61.3% goal in A2 - Admin Mgmt IV: During the 12-month period preceding the current AAP, there were 11 total placements (i.e., hires and/or promotions) into the A2 - Admin Mgmt IV job group. Nine of those 11 placements were filled by women for an 81.8% placement rate. As a result, the placement goal for Females in the A2 job group was achieved, and the placement goal for Females was eliminated for the 2020/2021 AAP.

Females: 64.4% goal in A4 - Admin Mgmt III: During the 12-month period preceding the current AAP, there were 20 total placements (i.e., hires and/or promotions) into the A4 - Admin Mgmt III job group. Twelve of those 20 placements were filled by women for an 60.0% placement rate. As a result, the placement goal for Females in the A4 job group was not achieved, and the placement goal for Females remains for the 2020/2021 AAP.

Although the placement goal was not fully achieved, there was an improvement in the placement for Females for the 2020/2021 AAP. There was a net increase of three women in this job group and the shortfall was reduced to four women (vs. a shortfall of seven women in 2019/2020).

41 C.F.R. § 60-2.17(b)(2): Personnel Activity

Applicant flow, hires, promotions, and terminations were analyzed by job group. An analysis of selection disparities in personnel activity between men/women and whites/minorities was accomplished through the use of Adverse Impact Analyses on the personnel transactions data.

See the *Summary of Personnel Transactions Report* for each job group as well as the corresponding adverse impact results below.

Adverse Impact

Using the Standard Deviations Fisher's Exact test, adverse impact indicators were found in the following personnel transactions:

Applicant Selection Rates:

Gender Groups: Adverse impact indicators were found for Males in the A2 - Admin Mgmt IV job group.

Available for Promotions Versus Promoted:

There were no adverse impact indicators identified affecting gender or race/ethnic groups in any job group categories.

Previous Headcounts Versus Retained (Voluntary)

Gender Groups: Adverse impact indicators were found for Females in the C5 - Computer, Technical Support and Science Occupations job group.

Previous Headcounts Versus Retained (All)

Gender Groups: Adverse impact indicators were found for Males in the A4 - Admin Mgmt III job group.

41 C.F.R. § 60-2.17(b)(3): Compensation Systems

Compensation analyses were conducted by comparing the salaries for men v. women, and whites v. minorities in each job group.

CHAPTER 9: ACTION-ORIENTED PROGRAMS

41 C.F.R. § 60-2.17(c)

The Chancellor's Office tailors our action-oriented programs each year to ensure they are specific to the problem identified.

Action-Oriented Program (AOPs):

The action-oriented programs designed to address the underutilization of women and minorities, the utilization goal set for individuals with disabilities, and the hiring benchmark for the protected veterans are listed below. These action-oriented programs will be carried-out throughout the AAP year. Evaluation of these AOPS will be conducted at least annually. The Senior Director, Chancellor's Office Human Resources, and the Associate Director, HR, Talent Acquisition and Workforce Planning, with the help of the managers, will be responsible in ensuring that the following are implemented.

Recruitment:

1. The Chancellor's Office will continue to place advertisements on job opportunities through local job service resources.
2. Due to the extensive technical education and experience required for some positions, the Chancellor's Office will also continue to place job opportunity announcements in the Chancellor's Office website, and in national job placement resources when appropriate.
3. Advertisements and job postings will always carry the Equal Employment Opportunity tagline.
4. Minority and female applicants will continue to be considered for all positions for which they are qualified.
5. The Chancellor's Office will attend in-person job fairs if there are sufficient numbers of openings to warrant participation. Due to the pandemic, CO HR will also identify other ways to participate in job fairs (i.e., virtual job fairs).
6. The Chancellor's Office will continue to provide search committee (SC) training. The SC is responsible for:
 - A. Completing the "Searches in Recruitment in the CSU" training module by SWHR Learning & Development.
 - B. Reviewing a copy of the "What is Unconscious Bias and How to Minimize Unconscious Bias in Recruitment" handout. This will provide hiring managers with a list of various types of unconscious bias.
 - C. Reviewing a copy of the Department of Fair Employment and Housing (DFEH) fact sheet. This will provide examples of the types of questions that are acceptable and unacceptable to ask applicants during the interview process.

7. Continue to offer justice, equity, diversity and inclusion (JEDI) training to all employees. This continues to be a priority for the CSU and represents a core component of our mission. For example: Administrator III & IV levels were invited to participate in the virtual workshop, “Moving Beyond Bias,” which is a joint UC and CSU training initiative.
8. The Chancellor’s Office will also continue utilize the following recruitment sources:

All job postings are on CSU Careers, the Department of Rehabilitation (DOR) and the Employment Development Department (EDD), Careers in Government, and other specific advertising resources as needed.

Careers in Government (CIG)

Their targeted Social Media network reaches 15-million+ users per month. (Twitter, Facebook, Linked In, Instagram. Their partnership with private-sector job boards (Jobs2Careers, Zip Recruiter.com, Glassdoor.com, NEXXT, Appcast, Talroo).

The CSUCO automatically posts all positions on the top (8) eight Diversity websites at:

africanamericanjobnetwork.com
asianjobnetwork.com
disabilityjobnetwork.com
latinojobnetwork.com
lgbtjobnetwork.com
retirementjobnetwork.com
veteranjobnetwork.netwomensjobnetwork.com
findacaliforniajob.com.

Insight Into Diversity

11132 South Towne Square, Suite 203
St. Louis, MO 63123
Phone: 800-537-0655
Fax: 314-200-9956
Website: <http://www.insightintodiversity.com/>

VetJobs.com

PO Box 71445
Marietta, GA 30007-1445
Phone: 770-993-5117 or 877-838-5627
Fax: 770-993-2875
Website: <http://www.vetjobs.org>

Diverse Jobs in Higher Education

10520 Warwick Avenue, Suite B-8
Fairfax, VA 22030
Phone: 800-783-3199 or 703-385-2981 Fax: 703-385-1839

Website: <http://www.diversejobs.net>

**American Association of Hispanics
in Higher Education**

1120 S. Cady Mall, 1st Floor, Suite B-159
Tempe, AZ 85297-6303
Phone: 480-727-8210
Fax: 480-965-7165
Website: <http://www.aahhe.org>

Business & Professional Women/WA

18109 96th Street Court East
Boney Lake, WA 98391
Phone: 206-601-4162
Website: <https://www.bpwwa.org/>

National Council of Hispanic Employment Program Managers

Website: <http://www.nationalcouncilhepm.org/>

National Association of Asian American Professionals

4850 Sugarloaf Parkway, Ste 209-289
Lawrenceville, GA 30044
Phone: 919-625-1207
Website: <http://www.naaap.org>

National Black MBA Association, Inc.

Phone: 404-260-5444
Website: <http://www.nbmbaa.org>

National Congress of American Indians

Website: <http://www.ncai.org/>

Advancing Women

7315 Oak Lane Road
Elkins Park, PA 19027
Phone: 800-396-0227
Website: <https://careers.advancingwomen.com/>

Prospanica

Founded by National society of Hispanic MBAs
2711 LBJ Freeway, Suite 800
Dallas, TX 75234
Phone: 877-467-4622
Website: <https://www.prospanica.org/>

Employer Assistance Resource Network on Disability Inclusion

201 I.U. Willets Road
Albertson, NY 11507
Phone: 516- 465-1400
Website: <http://www.askearn.org>

The Viscardi Center

Employ and empower children and adults with disabilities

201 I.U. Willets Road
Albertson, NY 11507
Phone: 516- 465-1519
Website: <https://www.viscardicenter.org>

Goodwill Industries of Southern California (disabled)

342 San Fernando Road
Los Angeles, CA 90031
Phone: 323- 223-1211 or 888-446-6394
Website: <http://www.goodwillsocal.org>

Military.com – A Monster Company

Veteran Employment Center

Website:
<http://hiring.monster.com/solutions/hire-veterans.aspx>

National Association of Black Accountants, Inc

7474 Greenway Center Drive, Suite 1120
Greenbelt, MD 20770
Phone: 301-474-6222
Fax: 301-474-3114
Website: <http://www.nabainc.org>

Pacific Asian Consortium in Employment

1055 Wilshire Boulevard, Suite 1475
Los Angeles, California 90017
Phone: 213-353-3982
Fax: 213-353-1227
Website: <http://www.pacela.org>

Job Specifications/Selection Process:

1. Develop position descriptions that accurately reflect position functions, and are consistent for the same position from one location to another.
2. Develop job or worker specifications that contain academic, experience, and skill requirements that do not constitute inadvertent discrimination. Develop specifications that are free from bias with regard to age, race, color, gender, religion, national origin, disability or veteran status.

3. Approved position specifications and worker specifications will be made available to all members of management involved in the recruiting, screening, selection, and promotion process. Copies may also be made available to recruiting sources.
4. The Chancellor's Office will continue to use only worker specifications that include job-related criteria.
5. The Chancellor's Office will continue to carefully select and counsel all personnel involved in the recruiting, screening, selection, promotion, disciplinary, and related processes to eliminate bias in all personnel actions.

Job Advancement:

1. Minority and female employees can be made available for participation in Career Days, Youth Motivation Programs, and related activities in the community, as desired.
2. The Chancellor's Office will continue to post or announce job opportunities. The Chancellor's Office's Job Posting Policy System requires postings of all positions up to the Senior Management level.
3. The Chancellor's Office will continue to make use of the inventory of our current employee skills, when completed, to determine academic, skill, and experience level of individual employees.
4. Require supervisory personnel to submit justification when apparently qualified minority or female employees are passed over for upgrading.
5. Review seniority practices to ensure such practices are non-discriminatory and do not have discriminatory effect.
6. The Chancellor's Office will continue to use our formal employee evaluation program. The performance Appraisal is used for annual reviews for all employees.

CHAPTER 10: INTERNAL AUDIT AND REPORTING
41 C.F.R. § 60-2.17(d)

Inherent in the AAP is the need for periodic self-assessment of problems encountered, corrective action taken, and progress made. Self-evaluation requires complex record keeping systems on applicants, employees, and components of the AAP itself. Periodic reports from supervisors, department managers, the Senior Director, Chancellor's Office Human Resources, and the Associate Director, HR, Talent Acquisition and Workforce Planning, and other relevant persons are required.

The objective of all record keeping systems to be implemented is to assess the results of past actions, trends, the appropriateness of goals and objectives, the appropriateness and relevancy of identified solutions to problems, and the adequacy of the Plan as a whole. In addition, a further objective is to identify the proper corrective actions to be made to all components.

In order to fully achieve the objectives of such a record keeping system, the results of it must lead to follow-up through feedback to managers, supervisors, and staff, through reallocation of resources, through modifications to plans and the record keeping system itself, through appropriate recognition of personal achievements as well as punitive actions for discriminatory acts. For any identified deficiencies, appropriate corrective action will be identified and implemented.

The records that are maintained are the basis for updating the affirmative action plan, including revising the availability data and establishing annual numerical goals. The internal audit and reporting system is used as the basis for evaluating systemic, results-oriented programs and affirmative action efforts.

The Chancellor's Office auditing and reporting system periodically measures the effectiveness of its total affirmative action program. The Senior Director, Chancellor's Office Human Resources, and the Associate Director, HR, Talent Acquisition and Workforce Planning:

1. Monitor records of all personnel activity, including referrals, placements, transfers, promotions, terminations, and compensation, at all levels to ensure the nondiscriminatory policy is carried out;
2. Require internal reporting on a scheduled basis as to the degree to which equal employment opportunity and organizational objectives are attained;
3. Review report results with all levels of management; and
4. Advise top management of program effectiveness and submit recommendations to improve unsatisfactory performance.

**THE CALIFORNIA STATE UNIVERSITY
OFFICE OF THE CHANCELLOR**

**PART II: AFFIRMATIVE ACTION PLAN FOR PROTECTED VETERANS AND
INDIVIDUALS WITH DISABILITIES**

FOR

JULY 1, 2020 - JUNE 30, 2021

PART II

AAP FOR PROTECTED VETERANS AND INDIVIDUALS WITH DISABILITIES

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CHAPTER A: POLICY STATEMENT
41 C.F.R. §§ 60-300.44(a); 60-741.44(a)

It is the policy of the Chancellor's Office and my personal commitment that equal employment opportunity be provided in the employment and advancement for all persons regardless of race, religion, color, national origin, sex, age, sexual orientation/gender identity and status as a protected veteran or individual with a disability at all levels of employment, including the executive level. The Chancellor's Office does not and will not discriminate against any applicant or employee regardless of race, religion, color, national origin, sex, age, sexual orientation/gender identity and status as a protected veteran and/or individual with a disability to any position for which the applicant or employee is qualified. In addition, the Chancellor's Office is committed to a policy of taking affirmative action to employ and advance in employment qualified protected veteran employees and qualified employees with disabilities at all levels, including the executive level. Such affirmative action shall apply to all employment practices, including, but not limited to hiring, upgrading, demotion or transfer, recruitment, recruitment advertising, layoff or termination, rates of pay or other forms of compensation, and selection for training, including apprenticeship and on-the-job training. Decisions related to personnel policies and practices shall be made on the basis of an individual's capacity to perform a particular job and the feasibility of any necessary job accommodation. The Chancellor's Office will make every effort to provide reasonable accommodations to any physical and mental limitations of individuals with disabilities and to disabled veterans.

Employees and applicants shall not be subjected to harassment, intimidation, threats, coercion or discrimination because they have engaged in or may engage in any activity protected by state, federal or local anti-discrimination laws including 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 the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended (VEVRAA) or any other Federal, state or local law requiring equal opportunity for disabled veterans, recently separated veterans, active wartime or campaign badge veterans, or Armed Forces service medal veterans or Section 503 of the Rehabilitation Act of 1973, as amended (Section 503) or any other federal, state or local law requiring equal opportunity for disabled persons;;
- (3) Opposing any act or practice made unlawful by VEVRAA or its implementing regulations or any other federal, state or local law requiring equal opportunity for disabled veterans, recently separated veterans, active wartime or campaign badge veterans, or Armed Forces service medal veterans or section 503 or its implementing regulations or any other federal, state or local law requiring equal opportunity for disabled persons; or
- (4) Exercising any other right protected by VEVRAA or Section 503 or their implementing regulations.


Our obligations in this area stem from not only adherence to various state and federal regulations, but also from our commitment as an employer in this community to provide job opportunities to all persons regardless of race, religion, color, national origin, sex, age, sexual orientation/gender identity and status as a protected veteran or an individual with disability. The Chancellor's Office's EEO policy and affirmative action obligations include my full support.

The Chancellor's Office will also continually design and implement audit and reporting systems that will measure the effectiveness and the compliance of the AAP, identify the need for remedial actions, determine if objectives were attained, and determine if opportunities to participate in company-sponsored activities were extended to all employees and applicants.

The Chancellor's Office is also committed to abiding with the Pay Transparency Nondiscrimination Provisions and therefore, 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. The Chancellor's Office's employees who have access to the compensation information of other employees or applicants as part of their essential job functions are informed and trained to not disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) a 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 Chancellor's Office's legal duty to furnish the information.

It is also the Chancellor's Office's policy not to discriminate because of a person's relationship or association with a protected veteran. This includes spouses and other family members. Also, the Chancellor's Office will safeguard the fair and equitable treatment of protected veteran spouses and family members with regard to all employment actions and prohibit harassment of applicants and employees because of their relationship or association with a protected veteran.

If you have any questions regarding our equal employment opportunity, harassment policies or the complaint procedure, you may contact your local Human Resources representative. Parts of the Affirmative Action Plan may be reviewed, as appropriate, by making an appointment with a local Human Resources representative.



(Signature)

Dr. Joseph I. Castro
Chancellor

January 4, 2021

CHAPTER B: REVIEW OF PERSONNEL PROCESSES
41 C.F.R. §§ 60-300.44(b); 60-741.44(b)

To ensure that all personnel activities are conducted in a job-related manner which provides and promotes equal employment opportunity for all known protected veterans and employees and applicants with disabilities, reviews are periodically made of the Chancellor's Office's examination and selection methods to identify barriers to employment, training, and promotion.

- 1) The Chancellor's Office periodically conduct a review of its employment processes to ensure thorough and systematic consideration of the job qualifications of 1) known protected veteran applicants and employees; and 2) applicants and employees with disabilities for job vacancies filled either by external hiring or internal promotions/transfers, as well as for all training opportunities available. In order to determine whether an individual is qualified for a particular job, a close examination of the content of the job is made, as well as a review of the job qualifications of known protected veterans and individuals with disabilities, both applicants and employees. In determining the qualifications of a protected veteran, consideration is given only to that portion of the military record, including discharge papers, relevant to the job qualifications for which the veteran is being considered.
- 2) The Chancellor's Office ensures that its personnel processes do not stereotype individuals with disabilities or protected veterans in a manner which limits their access to jobs for which they are qualified.
- 3) The Chancellor's Office ensures that applicants and employees with disabilities have equal access to its personnel processes, including those implemented through information and communication technologies.
- 4) The Chancellor's Office provides reasonable accommodations, unless such accommodations will cause undue hardship to the Chancellor's Office, to applicants and employees with disabilities to ensure that equal employment opportunity are extended in the operation of its personnel processes.
- 5) The Chancellor's Office ensures that information and communications systems are accessible to all employees and applicants with disabilities even in the absence of a specific request for accommodation.

CHAPTER C: PHYSICAL AND MENTAL QUALIFICATIONS
41 C.F.R. §§ 60-300.44(c); 60-741.44(c)

To ensure that all physical and mental qualifications and requirements are job-related and promote equal employment opportunity for all known protected veterans and employees and applicants with qualified disabilities, reviews are periodically made of the Chancellor's Office's physical and mental qualifications and requirements as they relate to employment, training, and promotion.

The Chancellor's Office's physical and mental job requirements are reviewed to determine whether or not they are job-related and consistent with business necessity and safe performance on the job.

Schedule for Review: Any previously reviewed classification will be reviewed again if there is a change in working conditions which affects the job's physical or mental requirements (e.g., new requirements, new equipment, etc.)

**CHAPTER D: REASONABLE ACCOMMODATION TO PHYSICAL AND MENTAL
LIMITATIONS**

41 C.F.R §§ 60-300.44(d); 60-741.44(d)

The Chancellor's Office will make every effort to provide reasonable accommodations to physical and mental limitations of applicants and employees with disabilities or who are disabled veterans unless it can demonstrate that the accommodations would impose an undue hardship on the operation of business. Such reasonable accommodations are implemented in the Chancellor's Office's electronic and/or online application systems. The Chancellor's Office ensures that qualified applicants and employees with disabilities, who are unable to fully utilize the system, are provided equal opportunities to apply and be considered for all jobs. The Chancellor's Office will confidentially review performance issues of employees with known disabilities to determine whether a reasonable accommodation is needed when: 1) the employee is having significant difficulty with job performance, and 2) it is reasonable to conclude that the problem is related to the known disability.

CHAPTER E: HARASSMENT
41 C.F.R. §§ 60-300.44(e); 60-741.44(e)

The Chancellor's Office has developed and implemented a set of procedures to ensure that its employees with disabilities and protected veterans are not harassed due to those conditions. A copy of the sexual harassment policy, which includes a section prohibiting harassment of individuals with disabilities and/or protected veterans are available for distribution to new as well as to existing employees.

The Chancellor's Office also takes affirmative steps to ensure policies and procedures are implemented to meet sexual harassment laws within the State of California.

**CHAPTER F: EXTERNAL DISSEMINATION OF POLICY, OUTREACH AND
POSITIVE RECRUITMENT**
41 C.F.R. §§ 60-300.44(f); 60-741.44(f)

Based upon the Chancellor's Office's review of its personnel policies as described in Chapter B, the following activities will be implemented or continued to further enhance our affirmative action efforts. All activities are the responsibility of the Senior Director, Chancellor's Office Human Resources, and the Associate Director, HR, Talent Acquisition and Workforce Planning.

- 1) Initiate and maintain communication with organizations having special interests in the recruitment of and job accommodations for protected veterans and individuals with disabilities.
- 2) Include workers with disabilities when employees are pictured in consumer, promotional, or help wanted advertising.
- 3) Disseminate information concerning employment opportunities to radio and television stations, and to publications that primarily reach protected veterans and individuals with disabilities.
- 4) Provide information emphasizing job opportunities for protected veterans and individuals with disabilities to all local educational institutions, public and private.
- 5) Inform all recruiting sources, in writing and orally, of the Chancellor's Office's affirmative action policy for protected veterans and individuals with disabilities.
- 6) List with the State Employment Development Department all suitable job openings.

The exemptions for posting jobs are when positions are,

- (1) executive and top management positions,
- (2) positions that will be filled from within the contractor's organization,
- (3) and positions lasting three days or less.

This is an on-going activity. A listing of job opportunities reported to the local State Employment Service Delivery System is always kept current.

- 7) Send written notification of the Chancellor's Office's affirmative action policy to all subcontractors, vendors, and suppliers requesting appropriate action on their part. This includes their obligation to annually file their EEO Reporting form and VETS-4212 form and, for employers with 50 or more employees and contracts of \$50,000 or more, their obligation to develop a written affirmative action plan.
- 8) Conduct formal briefing sessions with representatives from recruiting sources. Include as part of the briefing sessions, facility tours, clear and concise explanations of current and future job openings, position descriptions, worker specifications, explanations of the Chancellor's Office's selection process, and recruiting literature. Arrange for referral of applicants, follow up with sources, and feedback on disposition of applicants.

- 9) Participate in veterans "job fairs" and work study programs with Veterans' Administration rehabilitation facilities and schools which specialize in training or educating protected veterans.
- 10) The Chancellor's Office will also grant leaves of absence to employees who participate in honor guards for the funeral of veterans.
- 11) Annually review the outreach and recruitment efforts taken over the previous twelve months to evaluate their effectiveness in identifying and recruiting qualified protected veterans and individuals with disabilities. Identify and implement alternative efforts, if previous efforts are not effective.
- 12) Ensure that activities undertaken to comply with the obligations of this section are documented and such documents are retained for a period of three (3) years.

CHAPTER G: INTERNAL DISSEMINATION OF POLICY
41 C.F.R. §§ 60-300.44(g); 60-741.44(g)

In order to gain positive support and understanding for the affirmative action program for protected veterans and individuals with disabilities the Chancellor's Office will implement or continue to implement the following internal dissemination procedures, all of which are the responsibility of the Senior Director, Chancellor's Office Human Resources, and the Associate Director, HR, Talent Acquisition and Workforce Planning. The following policies and procedures are designed to foster support and understanding from the Chancellor's Office's executive staff, management, supervisors, and other employees in an effort to encourage all employees to take the necessary actions to aid the Chancellor's Office in meeting its obligations.

- 1) Include the policy in the Chancellor's Office's policy manual and other in-house publications.
- 2) Conduct special meetings with executive, management, and supervisory personnel to explain the intent of the policy and individual responsibility for effective implementation, making clear the Chancellor' attitude.
- 3) Schedule training sessions for all employees involved in recruiting, selection, promotion, and other related employment issues for protected veterans and individuals with disabilities.
- 4) Discuss the policy thoroughly in both employee orientation and management training programs.
- 5) Inform union officials of the contractor's policy, and request their cooperation.

CHAPTER H: AUDIT AND REPORTING SYSTEM
41 C.F.R. §§ 60-300.44(h); 60-741.44(h)

The Chancellor's Office has developed and currently implements an audit and reporting system that addresses the following:

- 1) Measures the effectiveness of the Chancellor's Office's overall affirmative action program and whether the Chancellor's Office is in compliance with specific obligations.
- 2) Indicates the need for remedial action. Any corrective actions will be the responsibility of the Senior Director, Chancellor's Office Human Resources, and the Associate Director, HR, Talent Acquisition and Workforce Planning.
- 3) Measures the degree to which the Chancellor's Office's objectives are being met.
- 4) Whether there are any undue hurdles for individuals with disabilities and protected veterans regarding company sponsored educational, training, recreational, and social activities. This will also include, but not limited, to the review of the on-line and electronic application system to determine their accessibility and ensuring that procedures to request for accommodations are prominently displayed and that individuals with disabilities can readily obtain the needed accommodation.
- 5) Ensures that outreach activities are documented and that such documents are kept for at least a period of three (3) years.

CHAPTER I: RESPONSIBILITY FOR IMPLEMENTATION
41 C.F.R. §§ 60-300.44(i); 60-741.44(i)

As part of its efforts to ensure equal employment opportunity to protected veterans and individuals with disabilities, the Chancellor's Office has designated specific responsibilities to various staff to ensure the AAP focuses on all components of the employment system. To that end, the Chancellor, Vice Chancellor for Human Resources, the Assistant Vice Chancellor, Workforce Strategies & Chancellor's Office Human Resources, the Senior Director, Chancellor's Office Human Resources, the Associate Director, HR, Talent Acquisition and Workforce Planning, and those employed as supervisors and managers have undertaken the responsibilities described below.

Chancellor

The Chancellor is responsible for providing top management support for the Chancellor's Office's AAP. This person issues a memo annually to reaffirm the Chancellor's Office's Equal Employment Opportunity Policy and to make known to all employees and applicants the commitment of Senior Management to EEO and affirmative action. Additional responsibilities include, but are not limited to:

- 1) Designating appropriate personnel with the responsibility for overseeing, administering, implementing, and monitoring the Chancellor's Office's AAP. Ensuring that these personnel are identified in writing by name and job title.
- 2) Ensuring that designated personnel responsible for all AAP components are given the necessary authority and top management support and staffing to successfully implement their assigned responsibilities.
- 3) Imparting the personal direction that ensures total involvement and commitment to equal employment opportunity programs through the Chancellor's Office's AAP.

Vice Chancellor for Human Resources and Assistant Vice Chancellor, Workforce Strategies & Chancellor's Office Human Resources

The Vice Chancellor for Human Resources and the Assistant Vice Chancellor, Workforce Strategies & Chancellor's Office Human Resources are responsible for overall supervision of the AAP and ensure, through the Senior Director, Chancellor's Office Human Resources, the Associate Director, HR, Talent Acquisition and Workforce Planning, and department managers and supervisors, that all relevant policies and procedures are adhered to. Successful implementation of this program is a basis for evaluating the Senior Director, Chancellor's Office Human Resources, and the Associate Director, HR, Talent Acquisition and Workforce Planning's effective work performance. Responsibilities include, but are not limited to, the following:

- 1) Presenting all needed recommendations and procedural changes to Senior Management concerning EEO and affirmative action and ensuring that Senior Management is kept informed of the Chancellor's Office's compliance status.

- 2) Maintaining Company-wide management support and cooperation for the Chancellor's Office's AAP.
- 3) Collaborating with Senior Management on EEO and AAP issues.
- 4) Responsible for ensuring overall the Chancellor's Office's compliance with the AAP.
- 5) Ensuring that the AAP is updated annually for all establishments.
- 6) Providing guidance and direction to the Senior Director, Chancellor's Office Human Resources, and the Associate Director, HR, Talent Acquisition and Workforce Planning.
- 7) Ensuring that relevant staff, (i.e., Senior Director, Chancellor's Office Human Resources, Associate Director, HR, Talent Acquisition and Workforce Planning, managers, and supervisors) are aware that their work performance is being evaluated in part on the basis of their equal employment opportunity efforts and results.
- 8) Ensuring the Chancellor's Office's VETS-4212 form is filed annually with the Veterans' Employment and Training Service (VETS).

Senior Director, Chancellor's Office Human Resources and Associate Director, HR, Talent Acquisition and Workforce Planning

The Senior Director, Chancellor's Office Human Resources, and the Associate Director, HR, Talent Acquisition and Workforce Planning are also responsible for ensuring that the directives of the Chancellor, the Vice Chancellor for Human Resources, and the Assistant Vice Chancellor, Workforce Strategies & Chancellor's Office Human Resources are implemented. Duties of the Senior Director, Chancellor's Office Human Resources, and the Associate Director, HR, Talent Acquisition and Workforce Planning include, but are not limited to, the following:

- 1) Providing direction to the Chancellor's Office's employees, as necessary, to carry out all actions required to meet the Chancellor's Office's equal employment opportunity and affirmative action commitments.
- 2) Responsible for the design and effective implementation of the AAP at all establishments.
- 3) Developing, implementing, and maintaining audit and reporting systems to measure effectiveness of equal employment opportunity programs, including those that will
 - a) Indicate need for remedial action,
 - b) Determine degree to which goals and objectives have been obtained.
- 4) Advising management in the modification and development of the Chancellor's Office's policies to ensure the enhancement of equal employment opportunity for all employees and

potential employees within existing equal employment opportunity guidelines.

- 5) Identifying problem areas and establishing procedures, goals and objectives to solve these problems.
- 6) Providing guidelines in the development, preparation, and implementation of career counseling programs for known protected veterans and employees with disabilities.
- 7) The Chancellor's Office conducts periodic audits to ensure that all required posters and the equal employment opportunity policies and AAP are displayed properly. The Chancellor's Office also conducts audits to ensure that the Invitation to Self-Identify (pre and post-offer) for protected veterans and individuals with disabilities, the Chancellor's Office's equal employment opportunity, and AAP policies are being utilized appropriately and thoroughly communicated.
- 8) Ensure that employees are re-surveyed regarding their disability status every five (5) years and send out reminders to employees, at least once during the five (5) year intervals, that they may voluntarily update their disability status at any time.
- 9) Developing policy statements, affirmative action programs, internal and external communication techniques.
- 10) Assisting line management in arriving at solutions to problems.
- 11) Serving as the liaison between the Chancellor's Office and enforcement agencies.
- 12) Serving as the liaison between the Chancellor's Office and organizations and community action groups for protected veterans and individuals with disabilities, in addition to ensuring that representatives are involved in community service programs of local organizations for protected veterans and individuals with disabilities.
- 13) Keeping management informed of the latest developments in the equal employment opportunity area.
- 14) Reviewing, reporting on, and updating the AAP annually in accordance with stated policy. Informing employees and applicants of significant changes.
- 15) Working closely with the Vice Chancellor for Human Resources, the Assistant Vice Chancellor, Workforce Strategies & Chancellor's Office Human Resources, and department managers and supervisors in coordinating the effective implementation of all identified affirmative actions.
- 16) Assisting in review and revision of all policies, procedures, and rules to ensure they are not in violation of federal or state laws and regulations.
- 17) Assisting line management in arriving at solutions to EEO/AA problems.

- 18) Reviewing results of audit and reporting systems to assess the effectiveness of the Chancellor's Office's AA programs and to direct corrective actions where necessary.
- 19) Providing guidance to managers and supervisors in taking proper action to prevent employees from being harassed in any way, through one-on-one contact, training, and disciplinary action.
- 20) Reviewing the qualifications of all employees to ensure equitable opportunity, based on job-related employment practices, is given to all for transfers and promotions.
- 21) Conducting periodic audits of: 1) training programs and hiring and promotion patterns to remove impediments to the attainment of AAP goals and objectives, and 2) the Chancellor's Office's sponsored educational, training, recreational, and social activities to ensure that all employees are encouraged to participate in accordance with policies on non-discrimination. Determine whether known protected veterans and employees with disabilities have had the opportunity to participate in all Company-sponsored educational, training, recreation and social activities.
- 22) Reviewing all job descriptions and specifications to ensure they are free of discriminatory provisions and artificial barriers. Ensuring that all requirements are job-related, that they are realistic, and that they reflect the actual work requirements of the essential job duties.

Managers and Supervisors

In their direct day-to-day contact with the Chancellor's Office's employees, managers and supervisors have assumed certain responsibilities to help the Chancellor's Office ensure compliance with equal employment opportunity programs and effective implementation of the AAP. These include, but are not limited to the following:

- 1) Aggressively adhering to the Chancellor's Office's equal employment opportunity policy.
- 2) Supporting and assisting the Vice Chancellor for Human Resources, the Assistant Vice Chancellor, Workforce Strategies & Chancellor's Office Human Resources, the Senior Director, Chancellor's Office Human Resources, and the Associate Director, HR, Talent Acquisition and Workforce Planning in developing, maintaining, and successfully implementing the AAP.
- 3) Completing progress reports regarding the status of affirmative action programs.
- 4) Taking action to prevent harassment of employees placed through affirmative action efforts.
- 5) Assigning employees to significant jobs that might lead to greater personal growth and value, and counsel them with respect to what is needed for upward mobility within the employment structure.

- 6) Ensuring that all interviews, offers of employment and/or wage commitments are consistent with the Chancellor's Office's policy.
- 7) Implementing the internal promotion and transfer of all employees under their supervision consistent with AAP goals and objectives.
- 8) Assisting in identifying problem areas and providing needed information for establishing and meeting department affirmative action goals and objectives.
- 9) Seeking and sharing information on feasible accommodations which have been or could be made for known disabilities.

CHAPTER J: TRAINING
41 C.F.R. §§ 60-300.44(j); 60-741.44(j)

The Chancellor's Office trains all employees involved in any way with the recruitment, selection, promotion, disciplinary actions, training, and related processes of individuals with disabilities or protected veterans to ensure commitment to the Chancellor's Office's stated affirmative action goals.

CHAPTER K: DATA COLLECTION ANALYSIS
41 C.F.R. §§ 60-300.44(k); 60-741.44(k)

The Chancellor's Office has adopted the current national percentage of veterans in the civilian labor force of 5.7% as its hiring benchmark for protected veterans. The Chancellor's Office will update its hiring benchmark as new data is published and updated via the OFCCP's website. The 5.7% hiring benchmark is applied to each job group within the Chancellor's Office.

The Chancellor's Office also adopted the current national utilization goal of 7.0% for qualified individuals with disabilities. The Chancellor's Office will update its utilization goal as new data becomes available, updated and published. The 7.0% utilization goal is applied to each job group within the Chancellor's Office.

Goals and/or benchmarks do not require that the Chancellor's Office hire, promote, train, and/or retain a specified number of individuals with disabilities and/or protected veterans. These goals/benchmarks are not rigid and inflexible quotas which must be met, but are instead targets reasonably attainable by means of applying every good faith effort to make all aspects of the entire AAP work. A goal is a guidepost against which the Chancellor's Office, a community group, or a compliance agency can measure progress in remedying identified deficiencies in the Chancellor's Office's workforce.

The Chancellor's Office has collected the required data and conducted studies to identify areas of opportunities in the employment of protected veterans and individuals with disabilities. The Chancellor's Office will continue to monitor and update these studies periodically during each AAP year. In each case where the hiring benchmark for protected veterans and/or the utilization goal for individuals with disabilities are not met, affirmative actions, as appropriate, will be taken consistent with the activities mentioned in Chapter F (External Dissemination of Policy and Outreach and Positive Recruitment) and measures described in Chapter H (Internal Audit and Reporting) of this AAP.

See the *Hiring Benchmark and Utilization Goals Analyses*.

CHAPTER L: COMPENSATION
41 C.F.R. §§ 60-300.21(i); 60-741.21(i)

It is the policy of the Chancellor's Office that when offering employment or promotion to protected veterans or individuals with disabilities, the amount of compensation offered will not be reduced because of any disability income, pension, or other benefit the applicant or employee receives from another source.

The Chancellor's Office is also committed to abiding with the Pay Transparency Nondiscrimination Provisions. Employees or applicants who have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant will not be discharged or in any other manner be discriminated. Employees who have access to the compensation information of other employees or applicants as part of their essential job functions are informed and trained to not disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) a 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 Chancellor's Office's legal duty to furnish the information.