

Executive Order 11246 Federal Affirmative Action Program

Affirmative Action Plan for Calendar Year 2014

University of Wisconsin Colleges
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I. Equal Employment Opportunity/Affirmative Action Statement

It has been, and will continue to be, the policy of UW Colleges (UWC) to promote the full realization of equal employment opportunity for minorities, women and persons with disabilities through a comprehensive affirmative action program. Affirmative action efforts for women, racial or ethnic minorities, persons with disabilities, and veterans will be undertaken to ensure equal opportunity and to overcome the present effects of past discrimination. The policy applies to all units and governs employment of all employees of UW Colleges, and covers all aspects of the employment relationship. In conformity with applicable University of Wisconsin System and Board of Regents policies, the chancellor of UW Colleges provides the Office of Inclusion with an adequate budget and staff commensurate with the responsibility for ensuring AA/EEO compliance and will maintain an affirmative action/equal opportunity committee. Furthermore, UW Colleges is committed to providing reasonable accommodations for persons with disabilities to ensure equal access to employment and to all benefits associated with employment, and provides reasonable accommodations for religious practices upon request from employees.

In accordance with applicable federal laws, state statutes, and University of Wisconsin System and Board of Regents policies, the University of Wisconsin Colleges will protect and provide redress against discrimination or harassment in employment and educational opportunities on the basis of age, race, color, religion, creed, national origin, ancestry, sex, marital status, parental status, pregnancy, sexual orientation, gender identity or expression, cultural identity or expression, disability, arrest record, conviction record, veteran status or membership in the national guard, state defense force or any other reserve component of the military forces of the United States or Wisconsin. Any employee, student, or member of the public who believe they have witnessed unlawful discrimination or harassment, or feel they have been the target of unlawful discrimination or harassment, are encouraged to report the incident to a supervisor, campus administrator, HR professional, or to the Affirmative Action Officer in the Office of Inclusion. Retaliation against a person who files a discrimination complaint is also a form of discrimination which is against the law and will not be tolerated.

Complaint processes and procedures are available for all employees, students, and members of the public alleging unlawful discrimination and/or harassment in the employment setting can be found on the Office of Inclusion's website at <http://inclusion.uwex.uwc.edu/policies>. Notice of fair employment rights and procedures are posted at the various personnel offices as well as at all employing units.

An Affirmative Action Plan compendium will be posted on the Office of Inclusion website at http://www.uwex.uwc.edu/inclusion/resources/aa_eeo. In addition, this Affirmative Action Plan can be viewed in its entirety during normal business hours at the following locations: the Dean's Office at any of the 13 UWC campuses, the UWC Office of Human Resources at 432 N. Lake Street, Room 103, Madison, WI 53706, or the Office of Inclusion, 432 N. Lake Street, Room 501, Madison, WI 53706. To request this affirmative action plan in an alternative format, please call 608-262-0277 or 7-1-1 for Wisconsin Relay.

Aaron Brower, Interim Chancellor

Date

II. Responsibility for Implementation of the Affirmative Action Plan

The University of Wisconsin Colleges is a multi-campus institution that prepares students for success at the baccalaureate level of education, provides a liberal arts general education that is accessible and affordable, and advances the Wisconsin Idea by bringing the resources of the University to the people of the state and the communities that provide and support its campuses.

Interim Chancellor Aaron Brower, is the chief executive officer of the UW Colleges and UW-Extension and reports to the president of the UW System, Ray Cross. The chancellor and a central executive administrative staff are located in Madison, Wisconsin. Each of the 13 UW Colleges campuses is administered by a campus executive officer/dean, who reports to the chancellor, as well as an assistant dean for administrative services, an assistant dean for student services, and several administrative directors who report to the campus dean.

As the chief executive officer of UW Colleges, the Chancellor has the overall responsibility for UWC's equal employment opportunity and affirmative action programs. The operational aspects of the EEO/AA program are delegated to various offices within UWC. In the absence of the Chancellor, per Wisconsin Statute, the Provost/Vice Chancellor assumes the responsibilities of the chief executive officer.

The Chancellor has delegated oversight responsibilities for AA/EEO compliance to the Office of Inclusion. The Director of the Office of Inclusion has assigned operational aspects of AA/EEO compliance to staff within the office, specifically the Assistant to the Chancellor for Affirmative Action (AA Officer) and the Civil Rights Specialist. In this capacity, OEDI staff has the full support and access to senior management officials including the Chancellor, Deans and Directors, and other members of the administration who have AA/EEO responsibilities. OEDI staff members are responsible and accountable for:

- developing AA/EEO policies and processes;
- assisting in the development of AA/EEO compliant personnel processes;
- working with the Director of Personnel to design audit and reporting systems to monitor compliance;
- investigating, resolving, or otherwise recommending to the Chancellor the disposition of complaints of unlawful discrimination;
- coordinating the development of the annual Affirmative Action Plan;
- developing AA/EEO training programs;
- assisting management in identifying problem areas and in arriving at solutions;
- submitting required reports to external agencies;
- serving as a liaison between UW Colleges, UW System legal counsel, and enforcement agencies; and
- keeping management informed on the latest developments in AA/EEO laws and best practices.

The Provost and Vice Chancellor, Associate and Assistant Vice Chancellors, Campus Deans (incl. Assoc & Asst Deans), Department Chairs, Directors, and other supervisory personnel are responsible and accountable for the implementation of the affirmative action program within their units and for units reporting directly to them. Specific responsibilities include, but are not limited to:

- collecting and reporting data required for monitoring the affirmative action program;

- preparing position announcements, advertising copy, and recruitment plans per established personnel and affirmative action policies and procedures;
- ensuring that the AA/EEO statement “UW Colleges is an equal opportunity/affirmative action employer” is included in all employment advertisements and in all web and print media (i.e., brochures, annual reports, etc.)
- ensuring that criteria established for recruitment, hire, promotion, termination are applied fairly during the selection process;
- maintaining equitable processes for hires, promotions, transfers, layoffs, and terminations;
- creating and maintaining a working environment free of discrimination and harassment;
- working with the Office of Inclusion to provide accommodations to employees with disabilities (including pregnancy) or religious accommodations; ensuring proper AA/EEO posting requirements at all UWC facilities; and,
- promoting the affirmative action/equal opportunity commitments of UW Colleges to campus communities and other constituents including developing relationships with organizations that assist women, minorities, veterans, and persons with disabilities in employment.

The Director of Human Resources is responsible and accountable for the following aspects of the affirmative action program:

- working with the AA Officer to develop personnel processes that are AA/EEO compliant;
- working with the AA Officer to design audit and reporting systems to measure program effectiveness;
- monitoring the hiring process to ensure good faith efforts are made to recruit, interview, and appoint women and minorities;
- monitoring the implementation and evaluating the results of action plans that address problem areas;
- serving as the liaison between UW Colleges, UW System legal counsel, and enforcement agencies;
- initiating salary equity studies;
- ensuring that all employees and prospective employees have the opportunity to identify race/ethnicity, disability, and/or veteran status;
- providing necessary personnel data to the Office of Inclusion, including institutional hire, promotion, and termination data;
- such other activities as may be delegated by the Chancellor to promote the affirmative action program of UW Colleges.

The Vice Chancellor for Administrative and Financial Services is responsible and accountable for the following aspects of the affirmative action program:

- ensuring that all facilities owned or maintained by UWC are desegregated and accessible for persons with disabilities, and that gender-specific facilities such as locker rooms and restrooms are comparable.
- Ensuring that written notification of the EEO/AA policy is sent to subcontractors, vendors and suppliers requesting appropriate action on their part. The equal opportunity clauses that are found at 60-1.4, 250.4 and 741.4 will be referenced in all purchase orders, leases, contracts, etc. covered by Executive Order 11246, as amended; and the Readjustment Assistance Act of 1974; and the Rehabilitation Act of 1974, as amended.

Finally, equal opportunity/affirmative action efforts are the responsibility of all members of the university community. Performance evaluation of administrators and hiring authorities will include an assessment of, attention to and support of affirmative action and are evaluated annually on the basis of their performance with respect to these important institutional policies and principles.

III. Dissemination of Equal Opportunity/Affirmative Action Policy

The University of Wisconsin Colleges Equal Employment Opportunity/Affirmative Action (EEO/AA) Policy Statement will be disseminated throughout UW Colleges and to all employees--students, limited term, project, classified personnel, academic staff, faculty, deans, directors, and other limited appointees.

A. Internal Policy Dissemination

The EEO/AA policy statement will be *disseminated internally* as follows:

- Included in UW Colleges policy manuals such as the UW Colleges Unclassified Personnel Guidelines, Classified Personnel Policies, and in any Search and Screen Guidelines. Also included in any divisional, departmental, and/or unit personnel policies manuals and employee handbooks.
- Distributed to the Executive Committee, the Secretary of the Faculty and Academic Staff, all Human Resources/Personnel Officers and to all management officials, administrators and/or supervisors of UW Colleges.
- Publicized annually in the institutional periodical(s) and in divisional newsletters directed toward employees, students/clientele and other participants in UW Colleges education. Also, published as an insert in these and other communication vehicles for both internal and external audiences.
- Addressed in special meetings with executive, management and supervisory personnel to explain the intent of the policy and to explain individual responsibility for effective implementation and to make clear the Chancellor's commitment.
- Addressed during employee orientation sessions, other supervisory or management training sessions, or during special meetings with other employees to discuss the policy and to explain individual employee responsibilities.
- Discussed in meetings with union officials to inform them of the policy and to request their cooperation.
- Published in UW Colleges publications and articles covering EEO/AA programs, progress reports and promotions or other achievements of minority and women employees, and employees with disabilities.
- Conveyed in nondiscrimination clauses in all union agreements and in all contractual provisions reviewed to ensure they are nondiscriminatory.
- Communicated in writing to employees; provide information to enable employees to be aware of and avail themselves of its benefits.
- Conveyed in handbooks, and other publications monitored to ensure that minority and non-minority women, men and people with disabilities are depicted.

- The phrase "UW Colleges is an Affirmative Action/Equal Opportunity Employer, minorities, women, veterans, and persons with disabilities are encouraged to apply" or other appropriate nondiscrimination and affirmative action statement included in all employment advertisements and announcements.

B. External Dissemination

The EEO/AA policy statement will be disseminated *externally* as follows:

- All major recruiting sources will be informed both verbally and in writing of our commitment to employ minorities, women, and individuals with disabilities, disabled and Vietnam Era veterans, stipulating that these resources actively recruit and refer individuals in these categories for vacancies, and will comply with all AA/EEO laws and policies.
- All recruiting literature will contain an Affirmative Action/Equal Employment Opportunity statement.
- Written notification of the EEO/AA policy will be sent to subcontractors, vendors and suppliers requesting appropriate action on their part. The equal opportunity clauses that are found at 60-1.4, 250.4 and 741.4 will be referenced in all purchase orders, leases, contracts, etc. covered by Executive Order 11246, as amended; and the Readjustment Assistance Act of 1974; and the Rehabilitation Act of 1974, as amended.
- Prospective employees will be made aware of the existence of the affirmative action program, and will be provided information to enable them to avail themselves of its benefits.
- Written notification of EEO/AA policy sent to minority and women's organizations, community based organizations, community leaders, secondary schools, colleges and universities serving Hispanic/Latino, Native American/American Indian and Black or African American students.¹
- Minority and non-minority men, women and people with disabilities shall be depicted in consumer and help wanted advertising.

C. Outreach and Recruitment

UW Colleges will review its employment practices to ensure that its personnel policies and practices are consistent with its Affirmative Action Program for the employment and advancement of minorities, women, individuals with disabilities and covered veterans. In conjunction with these programs, hiring authorities (deans, directors, unit administrators, managers and supervisors) and human resources/personnel officers within UW Colleges will undertake the following outreach and positive recruitment activities:

- Position announcements for all UW Colleges positions will be sent to Job Service of Wisconsin. Where feasible, recruiting programs will be established with these offices, which provide assistance in locating qualified applicants.

¹ "...colleges and universities serving..." refers to institutions on higher education with student populations where the student population is 25% or more Native American/American Indian, Hispanic/Latino and/or Black or African American.

- Human Resources/Personnel Officers and others with recruitment or hiring responsibilities shall take positive action steps to recruit minorities, women, persons with disabilities and veterans to perform the jobs for which UW Colleges hires.
- Promotional packets shall be developed and distributed to interested individuals and organizations. Minorities, women and persons with disabilities will be featured in print or video publications developed. These packets should include information regarding:
 - UW Colleges, University System and state government structure
 - Institutional and divisional mission statements
 - All projected job opportunity forecasts and position descriptions (including permanent Classified and Unclassified, LTE and Project positions)
 - Application procedures and test dates (if applicable)
 - Employee benefits, hours of work and location
 - A list of UW Colleges affirmative action and human resources contacts
- Establish ongoing relationships with colleges (including technical colleges) and universities to expand recruitment sources. Offer services to educational institutions such as:
 - Active participation by Human Resources/Personnel, Affirmative Action and other staff in Career Day or other recruitment programs. Visit schools to provide information to students on career options in UW Colleges.
 - Communicate to students the opportunities for part-time or summer employment opportunities that exist in UW Colleges.
 - Furnish recruitment outreach packets to student audiences where applicable.
- Foster relationships with Community Based Organizations (CBOs) to expand sources for recruitment. This should include groups that serve racial/ethnic minorities, females, veterans and persons with disabilities.
- Use resources in the Office of Inclusion to assist in the identification of individuals and organizations to assist with recruitment of affirmative action group members.
- Establish relationships with CBOs to explain UW Colleges programs and advise them of resources. Write letters and initiate follow-up phone calls to establish personal dialogue and professional relationship with the CBOs.
- Arrange visits to CBO offices and make presentations to their membership or other constituents to complement UW Colleges outreach efforts.
- Invite CBO leaders to visit the campus/department/unit to explain UW Colleges employment opportunities and expose to UW Colleges work environment.
- Advertise position vacancies and job announcements in CBO newsletters or other communication vehicles.
- The Chancellor, Deans and Directors or other appropriate staff will seek opportunities to attend annual banquets or other special events sponsored by CBOs.
- Establish connections with members of clergy that provide services to various racial/ethnic, women or people with disabilities.

- Hiring authorities shall advertise employment opportunities in community papers, magazines or other media outlets that serve racial/ethnic minorities, women and people with disabilities. In addition they shall:
- Allocate a portion of recruitment and advertising budgets to achieve broad coverage thereby contributing to the creation of diverse applicant pools.
- Work with the communications specialists in each division to arrange for the publication of special feature stories about UW Colleges, particularly those that depict women, racial/ethnic minorities and people with disabilities.

IV. Statistical Measures Used in this Report

To determine whether or not minorities and women are fairly represented in the workforce; their representation is compared to their availability in the reasonable recruitment area. This process includes four steps: (1) the development of a current workforce analysis; (2) the grouping of job titles into job groups; (3) the determination of availability of women and minorities in reasonable recruitment areas within those job groups; and 4) a comparison of job group incumbents with estimated availability.

A. Workforce Analysis (41 CRF § 60-2.11 (a)) - Appendix A

The workforce analysis provides a listing of each job title in each department. The following information is given for each job title: the total number of incumbents, the total number of female and male incumbents, the total number of minority incumbents, and the total number of female and male incumbents in each race or ethnic category. The workforce data is obtained from the UW System payroll database, and is a snapshot of UWCs workforce as of the last payroll of October, 2013. This section also includes the included/excluded employee report, which identifies the employees who are paid through the University of Wisconsin-Extension, but who work for both UWC and UWEX. UWC's chancellor is excluded from the analysis as all chancellors are hired by the UW System President and are included in their affirmative action plan.

B. Job Group Analysis (41 CFR § 60-2.12 and 60-2.13) - Appendix B

All Titles from the workforce analysis are placed into job groups having similar content, wage rates, and opportunities. Job groups for classified staff are grouped according to the job groups assigned by the State of Wisconsin Office of State Employment Relations (OSER). Job Groups for Unclassified Staff, Faculty, and Instructional Academic Staff are grouped first according to UW System's Unclassified Personnel Guidelines #Unclassified Personnel Guidelines #4, and then by faculty department for faculty or IAS titles or functional area for administrative titles. Job Groups for all titles apply institution-wide.

Titles within job groups are ranked from the lowest to the highest paid. For each job title, the following information is provided: the total number of incumbents, the total number of female incumbents, and the total number of minority incumbents.

C. Availability Analysis (41 CFR § 60-2.14) - Appendix C

The availability analysis calculates the expected participation level of minorities and women in each job group based on reasonable recruitment areas. The availability percentages are referenced in the Incumbency v. Availability Summary, which may be found in Section III of this volume.

Most job group categories use data from the 2010 United States Census. The census areas used vary by job group but use United States and Wisconsin for recruitment areas. United States Census data is also used for faculty job groups, in addition to 2012 graduation data from the Integrated Postsecondary Education Data System (IPEDS) in these job groups.

The Wisconsin Office of State Employment Relations determines availability and goals for classified job groups.

D. Incumbency v. Estimated Availability (41 CFR § 60-2.15) - Appendix D

This analysis is prepared after availability rates for women and minorities in each job group are established. The percentage of women and minorities participating in each job group is compared with their estimated availability in the labor market. A Two Standard Deviation Test is used to determine if the percentage of women and minorities in the workforce is less than would reasonably be expected based on availability data. If the difference is more than two standard deviations, a placement goal is established for that job group and a problem area is identified. In the instance of a small job group where standard deviation is not appropriate, any difference is shown and a goal is identified for that job group. The Incumbency v. Estimated Availability Analysis Report is included in this volume as Appendix C.

V. Placement Goals by Job Group (41 CFR § 60-2.16)

The University of Wisconsin Colleges (UWC) is a federal government contractor and, as such, has an obligation to comply with federal affirmative action regulations. Where required by law and in accordance with the U.S. Labor Department Office of Federal Contract Compliance Programs (OFCCP)-recommendations for compliance with Executive Order 11246, UWC has established placement goals for jobs where women or minorities are not currently participating in the numbers expected by their availability. However, it is important to note that, pursuant to Executive Order 11246, federal contractors cannot engage in the use of employment preferences or quotas. Specifically, the OFCCP has been clear that a covered federal contractor or subcontractor may always employ the “best qualified” candidate for the position in question, even if minorities and women have been “underutilized” in that particular area of employment.

Properly understood, OFCCP goals are most useful in establishing recruitment pool selection percentages to insure that recruiters have the opportunity to know the size of the available pool of qualified candidates to help inform whether their recruiting efforts are sufficiently comprehensive. In other words, OFCCP’s “Placement Goals” operate in the way of a “quality control check” to help recruiters know if they have successfully recruited to the extent of the availability of the market.

Based on Incumbency v. Availability Analysis, the Office of Inclusion has established placement goals for the following job groups. UWC will make a good faith effort to recruit, hire, and promote women and minorities in the following job groups at the rates indicated.

Job Group	Women	Minorities
265 General Laborer		Yes
A01 Academic Administrators	Yes	Yes
A04 Program Managers		Yes
A06 Student Services Professionals		Yes
F02 TEN FAC Art	Yes	
F08 TEN FAC English		Yes
F12 TEN FAC Math	Yes	
F14 TEN FAC Philosophy	Yes	
IAS Business & Economics		Yes
IAS Chemistry	Yes	
IAS Comm & Theatre Arts		Yes
IAS English		Yes
IAS History	Yes	
IAS Math		Yes
IAS Music		Yes
IAS Political Science	Yes	

VI. Identification of Problem Areas (41 CFR § 60-2.33)

The following items have been identified as problem areas for recruitment and retention of faculty and staff at UW Colleges, particularly in the job groups where underutilization of women and minorities have been identified.

- Because of UWC's statewide distribution, positions are frequently located in non-metropolitan areas or in communities with little racial or ethnic diversity, which may create difficulties in building a diverse candidate pool.
- There is very little salary flexibility in the current pay plan, and salary ranges have fallen below peer institutions and do not meet candidates' expectations. Also, for some positions, salaries are no longer competitive with what is available in private industry.
- Fringe benefit packages continue to deteriorate, and faculty and staff haven't received pay increases in approximately 5 years, which further exacerbates the compensation difficulties. UWC is also losing employees at lower titles levels (in a progression series, such as faculty) because they are recruited to other institutions with more favorable compensation packages.
- Both the state of Wisconsin and the University of Wisconsin system have been the center of political turmoil. The polarized political environment, combined with public controversies involving the UW System, create an impression of a state and university system in flux. In prior years, recruiters could promote Wisconsin's quality of life and economic opportunities, which is more difficult now given the tumultuous national media coverage and the state's troubled economic status.
- Budget reductions lead to increased pressure on all institutional activities, including recruitment-related expenses, such as advertising.
- Significant staffing vacancies within the Office of Inclusion have limited the institution's ability to offer employee professional development programming or develop new institutional initiatives. The office positions are being refilled, but the unfortunate timing of multiple vacancies in a short period of time created short-term staffing limitations. In addition, the new staff will likely require orientation before the office is fully operational again.
- Openings for positions in some job groups, such as Executive Administrators, are infrequent. When openings occur at this level, UWC is committed to recruitment among specialty groups and organizations that have substantial participation by females and/or minorities.

VII. Action-Oriented Programs (41 CFR. § 60-2.17(c))

A. Institutional-level activities

- 1. Increase awareness of affirmative action and equal opportunities policies and responsibilities.**

The Office of Inclusion, divisional Human Resource staff, and the Employee Assistance Office staff developed a new "Rights and Responsibilities" workshop program for all faculty and staff.

The program is offered annually, and the content rotates. The first year's content reviewed employees' rights and responsibilities relating to illegal discrimination based upon a protected status, and the second year focused on topics related to medical issues, such as medical leave, and accommodations for people with disabilities. The workshops are offered in person, but will also be recorded and posted to the institutional "foundational website," which is a clearinghouse for policies, forms, resources, and expertise relating to common Human Resource and Equal Opportunity-related issues.

The "foundational issues" website structure and content has been identified, and the website is in the Information Technology Website Development queue.

2. Reconfiguration and updating of Office of Inclusion functions

In 2006, UW Colleges and UW-Extension were administratively integrated at the direction of the UW System Board of Regents. UW-Extension's Office of Inclusion scope was expanded to include responsibility for UW Colleges faculty and staff as well. This melding proved challenging, and when the Office of Inclusion encountered multiple staff vacancies, the chancellor utilized the opportunity to conduct a review of the office's functions and configuration. The Office of Inclusion taskforce delivered a report to the chancellor, which led to a reconfiguration of the office's responsibilities, and redesign of many of the office's position descriptions. This redesign positions the Office of Inclusion for greater effectiveness and a more efficient service delivery moving forward.

3. Multicultural Awareness Program

The Multicultural Awareness Program utilizes peer facilitators to conduct 2 day workshops for UWC faculty and staff. The program encourages participants to: "Explore personal beliefs about diversity in a safe and confidential environment; Expand understanding of diversity issues and of cultures and groups; learn a common language and concepts; and learn how diversity and inclusion can help us build a vital organization." The workshop format includes interactive lecturettes, small group discussions, facilitated activities, and videos with discussion. UWC employees are encouraged to attend the workshops, and the institution reimburses employees for their lodging and travel expenses, and doesn't charge a registration fee. The workshops are held approximately 6 times a year, and open to all UWC employees.

4. UW-Extension/UW-Colleges Leadership Academy

The UW-Extension/UW Colleges Leadership Academy is a formal, two-year leadership training program for individual contributors and managers. This model leadership program enables graduates to emerge with a multidimensional perspective and competence needed to meet the challenges of a constantly changing environment, to think strategically, and to act

collaboratively as they serve the educational needs of Wisconsin residents.” The program enables promising employees to develop the knowledge and skills necessary for leadership roles. Equal Opportunity, Affirmative Action, and inclusion-related issues are often addressed in context of leadership development and the need to respond to changing environments. Participants are nominated and selected into the program, and applicant diversity is considered when establishing the participant class.

5. Comprehensive Revision and Updating of all Affirmative Action and Equal Opportunity Policies, Procedures, and Forms

Most of the UW-Extension AA/EEO related policies were created prior to the administrative integration between UW Colleges and UW-Extension. The chancellor has charged an institutional policy taskforce to conduct a comprehensive review and updating of all AA/EEO-related policies, procedures, and related materials. This review will ensure that the policies and related documents reflect current organizational structure and practices, and evolving law, and ensure that the institutional responsibilities are communicated to the public, students, applicants, and employees in an effective manner.

6. Enhanced Employee Data Record-keeping Capabilities

UW System created a new database system for recording employee-related data, such as timekeeping, hiring processes, appointments, etc. This system-level project replaced many campus or institutional-level databases that collect similar data and served similar functions. Although these systems provide greater consistency across the system, the transition from multiple, institutional-level databases to system-wide programs was challenging. Human Resource staff, Office of Inclusion staff, and other related staff continue to work with the Human Resource System team regarding the Talent Acquisition Management module to ensure it is meeting the recruiting needs for Affirmative Action responsibilities, and to coordinate the data collection process for analyzing diversity in applicant pools. These new systems will enable greater consistency in tracking applicant data, and more complex analysis of employee and applicant data.

7. Inclusive Search and Screen processes

UWC actively recruits and encourages qualified minorities and women to apply for vacancies. Position descriptions and job announcements indicate an appreciation for diversity, and reinforce UW-Extension’s commitment to equal opportunity employment activities. UWC sends job vacancy announcements to targeted minority and women’s associations, organizations and interest groups and encourages them to refer qualified candidates. In addition, UWC seeks to empanel balanced and diverse search committees, all of whom are encouraged to actively network for well-qualified, diverse applicants. UWC requires that executive search consultant

representatives actively recruit a diverse and well-qualified candidate pool, whenever a search firm is retained to support an executive recruitment. Finally, all search and screen committee members receive training to ensure that they understand their equal employment opportunity/affirmative action responsibilities.

VIII. Audit and Reporting Systems

The Affirmative Action Officer has the responsibility for developing and preparing the formal documents of the AAP and monitoring parts of the plan for compliance; however, responsibility for effective implementation of the plan is vested with the administrators, managers, and supervisors throughout the organization. UWC's audit and reporting system is designed to:

- Measure the effectiveness of the AAP/EEO program;
- Document personnel activities;
- Identify problem areas where remedial action is needed; and
- Determine the degree to which UWC's AAP goals and objectives have been obtained.

The following activities are reviewed at least annually to ensure freedom from discrimination or stereotyping of individuals with disabilities and protected veterans in any manner, including that which may limit their access to any job for which they are qualified:

- Recruitment, advertising, and job application procedures;
- Hiring, promotion, upgrading, award of tenure, layoff, recall from layoff;
- Rates of pay and any other forms of compensation including fringe benefits;
- Job assignments, job classifications, job descriptions, and seniority lists;
- Sick leave, leaves or absence, or any other leave;
- Training, apprenticeships, attendance at professional meetings and conferences; and
- Any other term, condition, or privilege of employment.

UWC's audit system includes an annual report to comply with its EEO/AAP responsibilities. Managers and supervisors are asked to report any current or foreseeable EEO problem areas and are asked to outline their suggestions/recommendations for solutions. If problem areas arise, the manager or supervisor is to report problem areas immediately to the Affirmative Action Officer, who will then recommend steps for remedial action to address the problem.

IX. Affirmative Action Program for Individuals with Disabilities, Special Disabled Veterans, and Vietnam Era Veterans (41 C.F.R. § 60-250, 41 C.F.R. § 60-741)

The University of Wisconsin Colleges complies with 41 Code of Federal Regulations (CFR) Part 60-250 title Affirmative Action and Nondiscrimination Obligation of Contractors and Subcontractors Regarding Special Disabled Veterans and Veterans of the Vietnam Era, as well as 41 CFR Part 60-741 titled Affirmative Action and Nondiscrimination Obligations of Contractors and Subcontractors Regarding Individuals with Disabilities. Specifically, UW Colleges:

- Ensures that an employee or applicant for employment is not discriminated against on the basis of a disability, disabled veteran status, or Vietnam era veteran status in any position for which an employee or job applicant is qualified.
- Ensures equal opportunity to employ and promote qualified individuals with disabilities and covered veterans at all levels of employment and includes all employment actions.
- Ensures UWC's participation in and involvement with community programs or events whose goal is to promote employment of qualified individuals with disabilities and covered veterans.
- Provides reasonable accommodations for qualified individuals with known disabilities, unless doing so would result in an undue hardship to the university.
- Prohibits harassment of any individual on the basis of disability, veteran's status, and all other protected characteristics.
- Complies with all applicable state and federal nondiscrimination employment laws regarding individuals with disabilities and covered veterans.
- Prohibits persons from intimidating, threatening, coercing, or discriminating against any individuals or interfering with the filing of a complaint, furnishing information or assisting in investigations, compliance hearings, or any other activity related to the administration of this Affirmative Action Plan.