

SECTION V.
AUDIT AND REPORTING SYSTEMS AND RECORDKEEPING

A. Objectives. The University carries out audit and reporting activities in connection with the affirmative action obligations set forth in this program. These activities are designed to accomplish the following objectives:

- Measure the effectiveness of this EEO/AA program
- Document personnel activities
- Identify problem areas where remedial action may be needed
- Determine the degree to which any designated goals and objectives have been attained
- Determine whether known individuals with a disability and known protected veterans have had the opportunity to participate in University sponsored educational, training, and other activities
- Measure the University's compliance with specific obligations stated in this affirmative action program
- Document compliance efforts

Some audit activities are conducted in connection with the preparation and issuance of this plan.

B. Responsible Officials. The EEO Coordinators identified in Section II above have been given the responsibility to insure that appropriate audit and reporting actions are taken.

C. Monitoring of Employment Procedures. The University's Coordinators review and monitor at least annually faculty and staff hiring and promotion procedures, education and training opportunities, and other employment benefits in the context of the University's stated EEO/AA obligations.

D. Data Analysis. Each year the University conducts several analyses of its affirmative action program for individuals with a disability and protected veterans, pursuant to the requirements of applicable federal regulations.

1. Applicant/Hire Analysis.

a. General. The University collects and reviews annually the following information for the preceding year regarding applicants and employees:

- The number of applicants who self-identify as individuals with a disability and protected veterans, and, in addition, the number of applicants who are otherwise known to fit into either such category
- The total number of job openings and the total number of jobs filled
- The total number of applicants for all jobs
- The total number of individuals with a disability and protected veterans who were hired
- The total number of applicants hired

b. Benchmark - Protected Veterans. A hiring benchmark based on the national percentage of protected veterans in the work force, as provided by the Office of Federal Contract Compliance Programs (OFFCP), is established by the University. This benchmark is regarded as a means of measuring progress toward achieving equal employment opportunity for protected veterans. Currently this figure is 8%. The foregoing data is maintained by the University for three years.

2. Utilization Analysis. The University reviews the previous year's outreach and recruitment efforts in terms of the effectiveness of those efforts in identifying and recruiting qualified individuals with a disability. This review involves comparing the utilization of faculty and staff who have a disability with a utilization goal of 7% for each job group, as established by the OFCCP. Utilization data is also collected and reviewed for protected veterans.

E. Reporting. Managers and supervisors are asked to report to the EEO/AA Coordinator any current or foreseeable problems or problem areas involving individuals with a disability or protected veterans who are applicants or employees. Suggestions or recommendations for resolving such problems are solicited from the managers and supervisors.

F. Periodic Meetings. EEO Coordinators meet at least once, mid-way through the annual period encompassed by this Affirmative Action Plan, to review activities conducted

hereunder and data regarding the representation of individuals with a disability and protected veterans in its workforce. EEO problem areas, such as a drop in the number or percentage of qualified disabled or protected veteran employees, grievances by individuals in these groups, etc. are discussed and suggestions and/or recommended remedial actions are, where possible, identified.

G. VETS-4212 Report. The University submits an annual VETS-4212 report to the Department of Labor indicating the number of employees in its workforce, by job category, who are protected veterans. The report also requires a statement of the number of new hires during the reporting period who are protected veterans. This report is based on data obtained principally from new hires as a result of the invitation to self-identify (see Exhibits 1 and 2). This data and the VETS-4212 report provide a means of measuring the effectiveness of this EEO/AA program.

H. Recordkeeping. The University retains all personnel records for a period of three years from the date the record was made or three years from the date of the personnel action involved, whichever occurs later. These records include, but are not limited to, job advertisements and posting, applications and resumes, tests and test results, interview notes, records relating to requests for reasonable accommodation, the results of any physical examination, and any other records relating to hiring, assignment, promotion, demotion, transfer, lay-off or termination, rates of pay or other terms of compensation, selection for training, etc. of employees.