

**AFFIRMATIVE ACTION
COMPLIANCE PLAN
FOR WOMEN AND MINORITIES**

Effective Dates: 09/30/2002 – 10/01/2003

Prepared by: Cheryl K. Wells
EEO Director

Phone Number: 817-735-2218

Approved by: Ronald R. Blanck, D.O.
President

Phone Number: 817-735-2555

Establishment's Name: The University of North Texas Health Science Center
at Fort Worth

Establishment's Address: 3500 Camp Bowie Blvd.
Fort Worth, Texas 76107

Table of Contents

	<u>Page</u>
1. Preface	3
2. EEO Policy Statement	5
3. Establishment of Responsibilities for Implementation	8
A. Designation of Responsibilities of EEO Administrator	9
B. Responsibilities of Management	11
4. Identification and Correction of Problem Areas	12
A. Identification of Potential Problem Areas	12
B. Special Corrective Actions	14
5. Accomplishment of Prior Year Placement Goals	16
6. Development and Execution of Action-Oriented Programs	18
7. Internal Audit and Reporting Systems	19
8. Compliance with OFCCP Sex Discrimination Guidelines	20
9. Dissemination of EEO Policy Statement	22
A. Internal Dissemination	22
B. External Dissemination (with attachments)	23
10. Historically Underutilized Business	25
11. Support of Community Affirmative Action Programs (with attachments)	26
12. Policy with respect to harassment	27
13. Statements Concerning Consideration of Minorities & Females not now in the workforce	28
14. Affirmative Action Plan for Workers with Disabilities and Qualified Covered Veterans	29
A. Policy Statement	30
B. Review of Personnel Processes	32
C. Physical and Mental Qualifications	33
D. Reasonable Accommodation to Physical and Mental Limitations	34
E. Harassment	35
F. External Dissemination of Policy, Outreach and Positive Recruitment	36
G. Internal Dissemination of Policy	37
H. Audit and Reporting System	39
I. Responsibility for Implementation	40
J. Training	41
15. Equal Employment Opportunity Policy on Religion and National Origin	42

1. PREFACE

UNT Health Science Center at Fort Worth (UNT Health Science Center) is fully committed to the concept and practice of equal opportunity and affirmative action in all aspects of employment. The management of UNT Health Science Center has voluntarily prepared this written Affirmative Action Compliance Plan (AAP) in conformity with E. O. 11246 and the implementing regulations of OFCCP, 41 CFR Part 60-1 & 60-2 (amended December 13, 2000).

In the preparation of this AAP, the terminology used in E.O.11246 and its implementing regulations have been used as a guide by UNT Health Science Center. Therefore, the use of such terms as “underutilization,” “deficiency,” “concentration,” “affected class,” etc., should not be construed as an admission by UNT Health Science Center, in whole or in part, that either minorities or women have been or are presently being underutilized, concentrated, or discriminated against in any way in violation of federal, state, or local fair employment practice laws. Further, nothing contained in the AAP or its supporting data should be construed as an admission by the institution, in whole or in part, that it has contravened such federal, state, or local employment practice laws.

In developing and implementing this AAP, UNT Health Science Center has been guided by its established policy of providing equal employment opportunity. Any goals that the institution has established herein are not intended as rigid, inflexible quotas that must be met, but rather as targets reasonably attainable by applying every good faith effort in implementing this AAP. The use effect of goals in this AAP is not intended to discriminate against an individual or group of individuals with respect to any employment opportunity for which he, she, or they are

qualified on the grounds that he, she, or they are not the beneficiaries of affirmative action themselves. Indeed, nothing herein is intended to sanction the discriminatory treatment of any person. Thus, the AACP has been developed in strict reliance upon the Guidelines on Affirmative Action issued by the Equal Employment Opportunity Commission (EEOC) (29 CFR Part 1608).

The material set forth in the AACP is deemed to constitute trade secrets, operations information, confidential statistical data, and other confidential commercial and financial data, within the meaning of the Freedom of Information Act, U.S.C. 552, Title VII of the Civil Rights Act of 1964 (as amended), 42 U.S.C. 2000e et seq., the Trade Secrets Act, 18 U.S.C. 1905, and 44 U.S.C. 3508, the disclosure of which is prohibited by law and would subject the individual making the disclosure to criminal and/or civil sanctions.

2. EEO Policy Statement Reaffirming Commitment to Equal Employment Opportunity

It has been, and shall continue to be the policy of UNT Health Science Center to direct our employment and personnel practices toward assuring equal opportunity for all employees and job applicants. Consequently, UNT Health Science Center intends that all personnel activities or actions relating to recruiting and hiring be free of discriminatory practices based on race, color, sex, age, religion, national origin, disability or veteran status.

UNT Health Science Center's EEO Administrator, Cheryl K. Wells, has been appointed by the President as the Equal Employment Opportunity (EEO) Administrator. The EEO Administrator is responsible for overseeing UNT Health Science Center's Affirmative Action Programs. Ms. Wells will monitor the program and complete formal, semi-annual reports to senior management. These program reports will serve as a basis for appropriate action to correct any program deficiencies.

UNT Health Science Center has established this voluntary written AAP to promote affirmative action and provide equal employment opportunity. This Program has been prepared in conformity with Executive Order 11246, as amended, and the implementing regulations of the Department of Labor's Office of Federal Contract Compliance Programs (OFCCP). The AAP is designed to provide guidance to management with respect to UNT Health Science Center's commitment to the full implementation of its EEO and Affirmative Action Policy. UNT Health Science Center's official EEO policy statement, signed by UNT Health Science Center's President, Ronald R. Blanck, D.O. is attached. UNT Health Science Center's equal employment opportunity and affirmative action policies include the following commitments:

1. To continue to provide equal employment opportunity to all qualified persons, and to continue to recruit and hire without regard to race, color, sex, age, religion, national origin, disability or veteran status.
2. To continue to provide equal employment opportunity to all qualified persons and to continue to train, promote and compensate persons in all jobs without regard to race, color, sex, age, religion, national origin, disability or veteran status.
3. To identify and analyze all areas of UNT Health Science Center's employment process in order to further the principles of equal employment opportunity. Employment decisions are made on the basis of furthering the objectives of equal employment.
4. To ensure that all personnel actions affecting employees in the areas of compensation, benefits, transfers, layoffs, returns from layoff, UNT Health Science Center sponsored training, education, tuition assistance, and social and recreational programs will be made without regard to race, color, sex, age, religion, national origin, disability or veteran status. UNT Health Science Center periodically reviews its personnel actions and collects data on a continuing basis for the purpose of monitoring such actions.
5. To monitor all employee benefit plans, including retirement, pension, disability and insurance benefits and to ensure that these benefits are in conformity with federal and state laws and regulations governing equal employment opportunity.

The EEO Administrator meets periodically with the appropriate management officials to review UNT Health Science Center's EEO progress and to develop AAP objectives, should they be required. The entire AAP is reviewed and updated annually.

The University of North Texas Health Science Center at Fort Worth
Equal Employment Opportunity and Affirmative Action Policies

1. The University of North Texas Health Science Center at Fort Worth (UNT Health Science Center), through its responsible managers, recruits, hires, upgrades, trains, and promotes in all job titles without regard to race, color, religion, sex, national origin, age, disability or veteran status, except where an accommodation is unavailable and/or it is a bona fide occupational qualification.
2. Managers shall ensure that all personnel actions such as compensation, benefits, layoffs, returns from layoffs, UNT Health Science Center-sponsored training, educational tuition assistance, and social and recreational programs shall be administered without regard to race, color, religion, national origin, sex, age, disability or veteran status, except where an accommodation is unavailable and/or it is a bona fide occupational qualification.
3. Managers shall base employment decisions on the principles of equal employment opportunity and with the intent to further UNT Health Science Center's commitment to affirmative action and equal employment. At no time will any covered employee, or covered applicant for employment, who exercises his/her rights pursuant to UNT Health Science Center's Affirmative Action Policy be subject to discipline, or have his/her opportunities for employment adversely affected.
4. Managers shall take affirmative action to ensure that qualified minority group individuals, females, disabled veterans, veterans who served active duty in the Armed Forces during a war or in a campaign or expedition for which a campaign badge has been authorized, and persons with a disability are introduced into the workforce, are encouraged to aspire for promotion, and are considered as promotional opportunities arise.
5. UNT Health Science Center invites any employee or any applicant for employment to review UNT Health Science Center's written Affirmative Action Programs. These programs are available for inspection upon request Monday – Friday between the hours of 8:00 a.m. and 5:00 p.m., in the EEO Office located in EAD, room 265. Any questions should be directed to me, your supervisor, or Cheryl K. Wells, EEO Administrator.
6. Applicants are encouraged to identify their race and sex. This self-identification is strictly voluntary, confidential and will not result in retaliation of any sort.
7. Employees are invited to self-identify as an individual with a disability or qualified covered Veteran. This self-identification is strictly voluntary, confidential and will not result in retaliation of any sort.
8. Employees and applicants shall not be subjected to harassment, intimidation, threats, coercion or discrimination because they have engaged in or may engage in any of the following activities: (1) filing a complaint; (2) assisting or participating in an investigation, compliance review, hearing, or any other activity related to the administration of Section 503 of the Rehabilitation Act of 1973, as amended, the Vietnam Era Veterans' Readjustment Assistance Act of 1974 (VEVRAA), as amended, Jobs for Veterans Act of 2002, or any other federal, state or local law requiring equal opportunity for disabled persons or qualified covered veterans or; (3) opposing any act or practice made unlawful by Section 503, VEVRAA or its implementing regulations in this part or any other federal, state or local law requiring equal opportunity for disabled persons or for special disabled veterans or covered veterans; or (4) exercising any other right protected by Section 503 or its implementing regulations in this part or any other right protected by VEVRAA or its implementing regulations in this part.

Ronald R. Blanck, D.O.
President
UNT Health Science Center
October 1, 2003

3. Establishment of Responsibilities for Implementation of the Written Affirmative Action Compliance Plan (41 CFR 60-2.17(a))

The implementation of the AACP follows the requirements of the regulations issued by OFCCP, specifically Government contractors, Affirmative Action requirements, and Final Rule. With respect to the requirement that UNT Health Science Center designate an individual responsible for implementation of the AACP, UNT Health Science Center has appointed a specific institution executive with that responsibility. Further, UNT Health Science Center has made known to each level of supervision that its work performance will be evaluated, in part, on the basis of its efforts to assure the success of the EEO objectives. Actions by supervisory personnel inconsistent with this policy and with the AACP will not be tolerated.

A. Designation of Responsibilities of EEO Administrator (41 CFR 60-2.17(a))

October 1, 2003

TO: All UNT Health Science Center Employees

FROM: Ronald R. Blanck, D.O.
President

RE: Appointment of Cheryl K. Wells as Equal Employment Opportunity Administrator

Cheryl K. Wells has been appointed as UNT Health Science Center's Equal Employment Opportunity (EEO) Administrator.

As the EEO Administrator, Ms. Wells must have the authority, resources, support of and access to top management to ensure the effective implementation of the affirmative action program. Should anyone have any questions regarding Ms. Wells' authority, or role as the UNT Health Science Center's EEO Administrator, please contact me immediately.

Ms. Wells' responsibilities include the following:

1. Developing and implementing UNT Health Science Center's EEO and affirmative action policies and procedures to ensure that the requirements of Executive Order 11246, as amended, and the OFCCP implementing regulations are satisfied.
2. Developing, modifying and maintaining written affirmative action programs (AAPs), in compliance with the applicable rules and regulations of the OFCCP.
3. Evaluating EEO and affirmative action progress at UNT Health Science Center. This evaluation includes the establishing of placement rate goals that are reasonable, attainable and consistent with UNT Health Science Center's affirmative action commitment.
4. Assisting UNT Health Science Center's management in reaching solutions to problems that may arise as UNT Health Science Center's AAPs are implemented.
5. Designing and implementing audit and reporting systems that will permit the continuous monitoring of UNT Health Science Center's EEO and affirmative action progress. These systems will be used to:
 - a) Measure the effectiveness of UNT Health Science Center's AAP;
 - b) Determine the degree to which UNT Health Science Center's objectives and placement rate goals have been achieved; and,
 - c) Indicate any need for additional action.

6. Serving as UNT Health Science Center's representative in its dealings with federal and state EEO agencies.
7. Serving as a liaison with minority organizations, female organizations, and community action groups concerned with the employment opportunities of minorities and females.
8. Assisting in the investigation, handling and disposition of employee discrimination and sexual harassment complaints.
9. Supervising and assisting in the modifications of the written AAPs.
10. Supervising and assisting in the completion of EEO Reports, Vets 100 Reports and EO Surveys.

Your full cooperation and support to assist Ms. Wells in this important task is expected and necessary.

B. The Responsibilities of UNT Health Science Center's Management to Ensure Implementation of the AACP (41 CFR 60-2.17(a))

In implementing this written Affirmative Action Compliance Plan, the responsibilities of UNT Health Science Center's supervisors and other management people working with the EEO Administrator include, but are not necessarily limited to, the following:

- * Helping evaluate EEO progress and develop alternative approaches, including the establishment of department or other unit goals, where applicable.
- * Periodically auditing training programs and hiring and promotion patterns in an effort to ensure that any impediments to achieving the goals are removed.
- * Selectively reviewing the qualifications of employees who are transferred or promoted, to ensure that minorities and women are being given full opportunity with respect to such personnel actions.
- * Providing career counseling for employees who request it.
- * Periodically making audits to ensure that UNT Health Science Center continues to comply in such EEO areas as the proper display of posters, provision of desegregated facilities, provision of comparable facilities for both genders, and encouragement of full participation by minority and women employees in all institution-sponsored educational, training, recreational, and social activities.
- * Communicating with supervisors and other management employees in order to apprise them that their work performance is being evaluated, in part, on the basis of their Affirmative Action Progress.

4. Identification and Correction of Problem Areas

A. Identification of Potential Problem Areas (41 CFR 60-2.17(b))

In making an in-depth analysis of UNT Health Science Center's total employment process, particular attention has been paid to those EEO categories where minority groups and women may face impediments to equal opportunity. A detailed discussion of this subject is set forth in the Utilization Analysis section of the AACP. However, in general terms, the institution has continued to make progress in placing minorities and women in various organizational units and job groups. Further, the institution's analysis has found that minorities and women are not restricted to any particular organizational unit or job. At the present time, minorities and women are involved in all major departments and units at the institution, and their progress into high-level jobs continues. An analysis of the personnel practices and procedures of the institution has revealed the following:

- * The composition of the workforce in terms of the overall numbers of minority groups and women continues to reflect the institution's strong commitment to equal employment opportunity.
- * UNT Health Science Center's intention is to examine periodically the workforce composition and to establish appropriate goals in order to improve the representation of minorities and women where impediments may exist.
- * Percentage placement goals are established when the population of women or minorities in a job group is significantly less than the determined availability. Underutilized job groups are listed on the Utilization Analysis report. It is the institution's intention to establish appropriate goals in order to improve the representation of minorities and women where disparities exist. This goal should in no way be considered a quota. Such goals (including consideration of the prescribed availability factors) are contained on the 2-Factor Analysis section of the AACP.

Data Sources: The data sources used in calculating workforce availability include:
– 1990 EEO Special File, Bureau of the Census

- * UNT Health Science Center has examined its total selection process, including position descriptions, job titles, application forms, interview procedures, referral procedures, the final selection process, training, compensation systems, and personnel activities. The result of this review has been to ensure that such personnel practices are being uniformly applied without regard to race, color, age, religion, disability, military status, gender, or national origin. The EEO Administrator is responsible for reviewing this selection process periodically to assure that any requisite qualifications are job-related and nondiscriminatory, and that all selection procedures are gender and race neutral.
- * Further, UNT Health Science Center plans to select sample job groups -- those with significant numbers of incumbent employees and with substantial employment opportunities -- for adverse impact studies, to be conducted in compliance with

Uniform Guidelines on Employee Selection Procedures, 41 CFR Part 60-3 (1978). The results will be reviewed and appropriate action taken where disparities are found.

- * UNT Health Science Center's physical facilities, sponsored recreation and social events, and special programs, including educational assistance, are all applied and made available on a nondiscriminatory basis. The use of UNT Health Science Center facilities will not be permitted on any basis inconsistent with the equal employment opportunity policy. All new employees are advised that all employee benefits, salaries, and benefit programs are administered in a totally nondiscriminatory fashion. The EEO Administrator is responsible for periodically reviewing these personnel areas to ensure that there is no such discrimination.
- * An examination of UNT Health Science Center's seniority practices has been made, resulting in findings that nondiscriminatory standards are used. Length of service is a factor for consideration in promotion, but the job-related qualifications of an individual are of even greater importance. Further, good faith efforts have been made to encourage minority and women employees to attain qualifications that will improve their opportunities for advancement.
- * Management desires to make the work environment in the institution supportive of EEO and has made efforts to obtain the views of the employees.

B. Special Corrective Actions (41 CFR 60-2.17(b))

We have conducted this analysis in order to ensure that UNT Health Science Center's commitment to EEO and affirmative action is being fully implemented. Having completed such an analysis, UNT Health Science Center has concluded the following:

- * Where problem areas are identified in any job group, placement goals are developed (see 41 CFR 60-2.16(a)), and goals have been established. This goal should in no way be considered a quota. The appropriate procedure for determining whether underutilization exists in any job group is to determine if there are any statistically significant differences between the actual number of minorities or females in a particular job group and the number theoretically expected from availability analysis. UNT Health Science Center believes it is reasonable that no goal is necessary where underutilization is less than one whole person.
- * UNT Health Science Center will make good faith efforts in the future to remove identified barriers, expand employment opportunities, and produce measurable results dependent upon the business conditions and number of placement opportunities which may occur. The table on the following report summarizes the goals that have been established for the program year.
- * The selection process employed is nondiscriminatory, and no standards are used which have the effect of eliminating from consideration a significantly higher percentage of minorities or women than of non-minorities or men, given availability.
- * Position descriptions are reviewed periodically and properly identify job-related requirements.
- * For supervisory or management positions, the ratio of referrals to hires for minorities or women does not indicate that a higher percentage of minorities or women is being rejected as compared to the percentage of non-minorities or men. Employment interviewing and screening is performed by personnel fully cognizant of UNT Health Science Center's policy of EEO.
- * Minorities and women are not excluded from any UNT Health Science Center-sponsored activities or programs, and such programs are fully integrated.
- * No de facto segregation exists at UNT Health Science Center.
- * No artificial barriers or restrictive seniority provisions that result in overt or inadvertent discrimination exist at UNT Health Science Center.

- * Support for UNT Health Science Center's policy of equal employment opportunity on the part of managers, supervisors, and employees is strong. The written Affirmative Action Compliance Plan has been fully communicated and has support at all levels of management.
- * The techniques that have been established for evaluating the effectiveness of the AACP include periodic review by the EEO Administrator of the data contained in the Required Support Data section. Further, the EEO Administrator makes continuing and periodic reports to management regarding the status of the AACP and the progress being made.
- * There is no lack of access to suitable housing, which might impede the employment of minorities and women by UNT Health Science Center.
- * Transportation, both public and private, is not a significant problem with respect to minority and female employment.
- * EEO posters provided by the federal government are prominently displayed in appropriate places at UNT Health Science Center.
- * A thorough analysis of the compensation, promotion, selection, and other policies and practices of UNT Health Science Center indicates that no gender, race, or ethnicity-based disparities exist.

5. Accomplishment of Prior Year Placement Goals
(41 CFR 60-1.40(c)) 41 CFR 60-1.12(b), -2.1(c) and -2.16

UNT Health Science Center has developed action-oriented programs designed to accomplish the established goals and objectives, thereby enhancing the employment and advancement opportunities within the institution for minorities and women. These efforts resulted in achieving some goals and objectives, making significant progress toward accomplishing others, and strengthening the affirmative action program overall. The results of the prior year's Affirmative Action Plan are identified on the following report.

This report references the job group representation in the 2002 affirmative action plan as well as the placement goal(s) set. Additionally, the actual hires, transfers into and promotions into groups in the AAP year are identified as placements for the purposes of this analysis. Placement goals for underutilized job groups equal to the estimated availability of minorities and females for the job group.

Job Group	2002 Job Group Representation					Placement Goal		Placements		
	Total	Minority	Min %	Female	Fem %	Minority	Female	Total	Minority	Min Rate
Exec	49	7	14.3%	17	34.7%		52.6%	6	0	0.0%
Faculty	196	49	25.0%	44	22.4%		37.1%	8	3	37.5%

* The difference between the actual placement and the placement goal is less than a whole person.

6. The Development and Execution of Action-Oriented Programs (41 CFR 60-2.17(c))

The following action-oriented programs or procedures designed to further UNT Health Science Center's commitment to Equal Employment Opportunity are continuing:

- A. Work specifications are monitored and changed as necessary to ensure that they do not screen out minorities and women and that they are job-related.
- B. UNT Health Science Center continues to evaluate the entire selection process and to make every good faith effort to select persons according to ability and qualifications, while recognizing its commitment to take affirmative action to remove impediments to women and minority entrants. Recruitment sources are notified of UNT Health Science Center's policy of nondiscrimination. There is no department or job group in the institution that is limited or closed to employees of a particular race, color, age, religion, disability, military status, gender, or national origin. Further, to help bring about Equal Employment Opportunity, the institution analyzes all selection techniques and employment standards periodically and, where they are found to create a potential impediment for minorities or women, to revise them unless they are job-related.
- C. UNT Health Science Center uses the following techniques to maintain a satisfactory flow of qualified minority and women applicants:
 - 1. Encouragement of minority and women employees to refer friends to UNT Health Science Center for potential employment.
 - 2. Inclusion of special recruitment efforts designed to reach minorities and women at all schools.
- D. UNT Health Science Center will periodically review its promotion criteria and procedures to ensure that promotional decisions are made without regard to race, color, age, religion, disability, military status, gender, or national origin. In an effort to maintain acceptable promotion rates for qualified minorities and women, UNT Health Science Center utilizes the following procedures:
 - 1. Providing job training, including such assistance as tuition fee waiver.
 - 2. Providing an employee evaluation program.
 - 3. Reviewing work specifications to ensure job-relatedness.
 - 4. Reviewing promotional decisions and requiring such decisions to be justified on a nondiscriminatory basis.
- E. UNT Health Science Center continually makes certain that its facilities and institutionally sponsored social and recreational activities are not segregated, and actively encourages all employees to participate in any such events.

7. Internal Audit and Reporting Systems (41 CFR 60-2.17(d))

UNT Health Science Center believes that one of the most important elements in effectively implementing a written Affirmative Action Compliance Plan is an adequate internal audit and reporting system. Through this system, the total program can be monitored for effectiveness, and management can be kept informed. For this purpose, UNT Health Science Center has established the following internal audit and reporting system:

- * Monitor records at all levels of personnel activity to ensure a nondiscriminatory policy is carried out.
- * Progress toward meeting goals is monitored periodically. Results of the monitoring analysis are communicated with recommendations, if necessary, to management.
- * Where necessary, the EEO Administrator communicates with senior management at least once a year at a minimum concerning recommendations to improve AACP results.

8. Compliance with OFCCP Sex Discrimination Guidelines - 41 C.F.R. 60-20

UNT Health Science Center complies with the sex discrimination guidelines. UNT Health Science Center's compliance is achieved through the following procedures:

1. UNT Health Science Center's employment advertising does not express a sex preference, nor does it appear in sex-segregated columns.
2. Applicants and employees of both sexes are recruited for all positions.
3. UNT Health Science Center's employee manual and employment application forms expressly state that UNT Health Science Center does not discriminate on the basis of sex.
4. UNT Health Science Center never relies upon any existing or repealed state female "protective" laws to deny female employees the right to any job they are qualified to perform.
5. UNT Health Science Center makes no distinction based upon sex with regard to employment opportunities, wages, hours or other terms and conditions of employment.
6. UNT Health Science Center makes no distinction between married and unmarried persons.
7. UNT Health Science Center does not deny employment to females with young children.
8. UNT Health Science Center complies with the Age Discrimination in Employment Act and does not terminate employees of either sex when they reach a certain age.

9. UNT Health Science Center provides appropriate physical facilities for both sexes.
10. UNT Health Science Center complies with the 1978 Pregnancy Discrimination Act, as amended, and Title VII of the 1964 Civil Rights Act. Company's leave of absence policy is uniformly applied regardless of sex. Maternity leave is treated like any other short-term disability leave.
11. UNT Health Science Center's wage rates are not related to or based on the sex of employees.
12. In conformance with 41 C.F.R. 60-20, UNT Health Science Center will continue to take affirmative action as follows:
 - a) Recruit females and encourage existing female employees to apply for positions that have been traditionally male.
 - b) Encourage females to access the educational fees cost reduction benefit.
 - c) Ensure that there is equal access to the educational fees cost reduction benefit, regardless of sex.
 - d) Should formal management training programs be created, ensure that females are encouraged to apply and qualified female applicants are accepted.
 - e) Ensure that senior management has been made aware of the requirements set forth above.

9. Dissemination of EEO Policy Statement

A. Internal Dissemination

UNT Health Science Center has successfully developed techniques for assuring continued dissemination of its EEO policy. The following statements reflect UNT Health Science Center's ongoing policies and internal dissemination programs:

1. UNT Health Science Center's EEO policy is included within our Employee Manual, and where appropriate, publicized in employee newsletter, annual report and other media.
2. Annual meetings are conducted with executive, managerial, and supervisory employees for the purpose of: (a) explaining the intent of UNT Health Science Center's EEO policy, and (b) confirming managerial responsibility for AAP implementation. At such meetings, the EEO Administrator will explain UNT Health Science Center's Affirmative Action Program and confirm the President's commitment to AAP.
2. During orientation meetings scheduled for new employees, UNT Health Science Center's EEO and AAP policies are discussed and explained.
3. As part of UNT Health Science Center's in-house training programs, EEO policies are discussed.
4. UNT Health Science Center posts its equal employment opportunity policy on bulletin boards. Additionally, the following items are prominently displayed at all locations:
 - a) "Equal Opportunity is the Law" poster;
 - b) The federal polygraph law poster;

- c) The federal minimum wage poster;
- d) The federal OSHA poster; and
- e) The “Family Medical Leave Act” poster.
- f) Public Information Act
- g) Whistle Blower Act
- h) Texas Employment Commission Notification
- i) Texas Commission for Human Rights Poster

5. Should employees be featured in advertising, employee handbooks or similar publications, both minority and non-minority and male and female employees will be included.

UNT Health Science Center has communicated to its employees the existence of its AAP and will make available the necessary information so that employees will be able to avail themselves of the AAP benefits.

6. Through its words and actions, UNT Health Science Center will continue to demonstrate to its employees that it will not tolerate the harassment of any employee with regards to race, color, sex, age, religion, national origin, disability or veteran status.

B. External Dissemination

UNT Health Science Center’s EEO policies are disseminated externally through the following procedures:

1. UNT Health Science Center informs all recruitment sources, both verbally and in writing, of our commitment to affirmative action. Contained within all communications to recruitment sources is a statement that all job applicants will be treated without regard to race, color, sex, age, religion, national origin, disability or veteran status. Various minority and female organizations have been contacted.
2. UNT Health Science Center will incorporate an equal employment opportunity clause

on purchase orders, as well as prominently display this clause on its employment applications.

3. UNT Health Science Center maintains contact with and communicates to the Texas Workforce Commission [State Employment Services], as well as various other community agencies who may be potential sources of minority and females applicants, apprising them of UNT Health Science Center's EEO policy.
4. UNT Health Science Center communicates to prospective employees, through the use of its employment application and posted commitment statements from the President, our commitment to affirmative action.
5. When UNT Health Science Center advertises in newspapers for prospective employees, the advertisement will include the EEO solicitation: "We are an Equal Opportunity Employer" or "EOE" or "M/F/D/V".
6. Should UNT Health Science Center use employees in any advertising, pictures of both minority and non-minority and male and female employees will be shown.
7. UNT Health Science Center will continue to provide equal employment opportunity to all qualified persons, and to continue to recruit and hire without regard to race, color, sex, national origin or disability status.

A weekly listing of open positions is placed on the institutional website and announcements are mailed to numerous community agencies to enhance recruitment efforts. **See Attachment**

10. Historically Underutilized Businesses (HUBs)

It is the policy of the State of Texas to encourage the use of Historically Underutilized Businesses (HUBs) by state agencies and to assist agencies in the implementation of this policy through race, ethnic, and gender-neutral means. The purpose of this program is to promote full and equal business opportunities for all businesses in state contracting in accordance with the goals specified in the State of Texas Disparity Study. 1 Texas Administrative Code Section 111.11 The University of North Texas Health Science Center at Fort Worth is committed to achieving the State's goal of increasing contracting opportunities for Historically Underutilized Businesses (HUBs).

The HUB Program is under the supervision of the HUB Administrator.

11. Support of Community Affirmative Action Programs

To involve community members and gain local support for its AAP, UNT Health Science Center completes the following:

1. Where appropriate, UNT Health Science Center appoints key members of management to serve on merit employment councils, community relation boards, and similar organizations. **See attachment** for examples of institutional community involvement. This is a sample listing and is not intended to be an all-inclusive listing of community involvement.
2. When requested by secondary schools and colleges, UNT Health Science Center assists these institutions in designing programs to enable minority and female graduates to compete in the open employment market on a more equitable basis.
3. UNT Health Science Center supports programs concerned with the employment opportunities for minorities and females.

12. Policy with Respect to Harassment

It is always the policy of UNT Health Science Center to afford a hospitable, cooperative and non-coercive work environment. That policy recognizes that harassment of any kind, including harassment of a sexual nature, is improper and will not be tolerated. Anyone guilty of engaging in such harassment will be subject to appropriate discipline, up to and including discharge.

No management official may threaten or insinuate, either explicitly or implicitly, that an employee's refusal to submit to sexual advances will adversely affect an individual's employment or career development. Sexually harassing conduct, whether committed by supervisors or non-supervisory personnel, is strictly prohibited. Sexually harassing conduct may include: propositions; verbal abuse of a sexual nature; graphic verbal commentaries regarding an individual's body; sexual or degrading words used to describe an individual; and, the display of suggestive objects or pictures.

UNT Health Science Center encourages all employees that believe they have been subjected to acts of harassment, to inform their supervisor or the EEO Director immediately to ensure that appropriate action may be taken to prevent such conduct. Where appropriate, strict confidentiality will be respected.

13. Statements Concerning Consideration of Minorities and Females Not Now in the Workforce

Government regulations require that placement rate goals be established for underutilized Job Groups, that consideration is given to minorities and females not currently in UNT Health Science Center's workforce but having the requisite skills, and that affirmative action be utilized to recruit these individuals. Where possible, UNT Health Science Center allows employees to work flexible hours or offers part-time employment to individuals who qualify. UNT Health Science Center offers dependent care benefits. Where possible, UNT Health Science Center will participate in high school and college co-op programs with institutions that have a high female and/or minority enrollment.

In meeting the placement rate goals established in the Utilization Analysis, and in hiring new employees generally, UNT Health Science Center makes every good faith effort to meet its affirmative action goals and objectives.

14. Affirmative Action Plan for Workers with Disabilities and for Qualified Covered Veterans

The target veteran groups include:

- 1) *Disabled Veteran;*
- 2) *Veterans who served on active duty in the Armed Forces during a war or in a campaign or expedition for which a campaign badge has been authorized;*
- 3) *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 No. 12985;*
- 4) *Recently Separated Veterans.*

A. Policy Statement (41 CFR 60-741.44(a); 250.44(a))

Under the affirmative action obligations imposed by Section 503 of the Rehabilitation Act of 1973, Vietnam Era Veterans' Readjustment Assistance Act of 1974, Veterans Employment Opportunity Act of 1998, and Jobs for Veterans Act of 2002, it is the policy of UNT Health Science Center through a positive outreach program, to provide equal employment opportunities and to advance in employment qualified covered veterans. This policy is designed to employ and advance all qualified individuals with a disability and qualified covered veterans at all levels of employment, including the executive level. The institution's policy of providing equal employment opportunities to qualified persons with a disability and qualified covered veterans shall apply to all employment practices including, but not limited to: upgrading, demotion or transfer, layoff or termination, rates of pay or other forms of compensation, and selection for training. UNT Health Science Center attempts to comply with all of the rules, regulations, and relevant orders of the Secretary of Labor and the Office of Federal Contract Compliance Programs (OFCCP), issued pursuant to the 1973 Rehabilitation Act and the 1974 Vietnam Era Veterans' Readjustment Assistance Act, Veterans Employment Opportunity Act of 1998 and Jobs for Veterans Act of 2002.

UNT Health Science Center's Affirmative Action Program for qualified persons with a disability and qualified covered veterans is reviewed and updated annually. If there are any significant changes in institutional procedure, or if employee rights or benefits are modified as a result of an annual updating, these changes are communicated to employees and to applicants for employment.

On a strictly voluntary basis, UNT Health Science Center invites all qualified covered veterans who are either employees, or who were applicants for employment, and employees who are persons with a disability or qualified covered veterans with a disability, and who wish to benefit under the Affirmative Action Program to identify themselves to either their immediate supervisor or to the EEO Administrator. Any individual who identifies himself/herself will not be subjected to any form of harassment or retaliation based on his/her status or self-identification.

Further, this self-identification will be kept confidential.

Employees and applicants shall not be subjected to harassment, intimidation, threats, coercion or discrimination because they have engaged in or may engage in any of the following activities: (1)

filing a complaint; (2) assisting or participating in an investigation, compliance review, hearing, or any other activity related to the administration of Section 503 of the Rehabilitation Act of 1973, as amended, the Vietnam Era Veterans' Readjustment Assistance Act of 1974 (VEVRAA),

as amended, or any other federal, state or local law requiring equal opportunity for disabled persons or special disabled veterans or qualified covered veterans or; (3) opposing any act or practice made unlawful by Section 503, VEVRAA or its implementing regulations in this part or any other federal, state or local law requiring equal opportunity for disabled persons or for special disabled veterans or qualified covered veterans; or (4) exercising any other right protected

by Section 503 or its implementing regulations in this part or any other right protected by VEVRAA or its implementing regulations in this part

B. Review of Personnel Processes (41 CFR 60-741.44(b); 250.44(b))

UNT Health Science Center has reviewed its personnel processes and determined that its present procedures are careful, thorough, and systematic in their consideration of the job qualifications of

applicants and employees who are qualified covered veterans and persons with a disability.
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Health Science Center analyzes specific job qualifications every time there is a job vacancy to ensure that the qualification requirements do not tend to screen out persons with a disability or qualified covered veterans. This analysis is completed on an individual basis should a person with a disability or qualified covered veterans be excluded from an open position. All qualification requirements approved by UNT Health Science Center are job related or consistent with business necessity and the safe performance of the job.

C. Physical and Mental Qualifications (41 CFR 60-741.44(c); 250.44(c))

Whenever UNT Health Science Center applies either physical or mental job qualification requirements in the selection of applicants or employees, for employment or other changes in employment status, e.g., promotion, demotion, or training, if the qualification requirements tend to screen out individuals with a disability or qualified covered veterans, the job requirements must be related to the specific job.

When UNT Health Science Center conducts a comprehensive medical examination of a qualified covered veteran or person with a disability, the results of such an examination are kept confidential to comply with 41 C.F.R. 60-250.23(d); 741.23 (d), except that:

- 1) Supervisors, managers, and UNT Health Science Center officials may be informed regarding restrictions and accommodations for the work or duties of qualified individuals with a disability or qualified covered veterans.
- 2) Employees familiar with first aid may be informed, where and to the extent appropriate, if a qualified individual with a disability or a qualified covered veteran might require emergency treatment.
- 3) OFCCP officials investigating compliance with either the 1973 Rehabilitation Act, the 1974 Vietnam Era Veterans' Readjustment Assistance Act, Veterans Employment Opportunity Act of 1998, or Job for Veterans Act of 2002 will be informed.

D. Reasonable Accommodation to Physical and Mental Limitations
(41 CFR 60-741.44(d); 250.44(d))

It is UNT Health Science Center's policy to make a reasonable accommodation to the physical and mental limitations of any employee with a disability, qualified applicants with a disability, or qualified covered veterans, unless his/her accommodation imposes an undue hardship on the Health Science Center's business (41 C.F.R. – 741.44(d); 250-44(d)). In determining the extent of the institution's accommodation obligations, the following factors, among others, are considered:

- 1) Business necessity; and
- 2) Financial cost and expense.

Each applicant or employee is dealt with on an individual basis. Reasonable accommodations are made whenever possible and ongoing efforts include revision of facilities to make them accessible. UNT Health Science Center makes every effort to provide suitable employment for those employees who become disabled while employed by us.

E. Harassment (41 CFR 60-741.44(e); 250.44(e))

UNT Health Science Center has developed and implemented procedures to ensure that its employees are not harassed because of their status as disabled or qualified covered veterans.

F. External Dissemination of Policy, Outreach, and Positive Recruitment
(41 CFR 60-741.44(f); 250.44(f))

After reviewing and determining that the Affirmative Action Policies of UNT Health Science Center provide the required affirmative action for the employment and the advancement of qualified individuals with a disability and qualified covered veterans, UNT Health Science Center has undertaken the following outreach and positive recruitment activities:

- 1) UNT Health Science Center will continue to work with recruiting sources to ensure that disabled individuals and qualified covered veterans are aware of openings and are submitting applications.
- 2) When hiring has been required, or will be needed, UNT Health Science Center has completed recruitment activities at educational institutions that participate in the training of the disabled. UNT Health Science Center has also engaged in recruitment activities with veterans' service organizations that service special disabled veterans and other qualified covered veterans. Meaningful contacts with the above named agencies or facilities have been made for such purposes as advice, technical assistance, and referral of potential applicants who are qualified persons with a disability or qualified covered veterans.
- 3) UNT Health Science Center has included, or will include, workers with a disability and qualified covered veterans when the institution employees are pictured in consumer, promotional, or help-wanted advertising.

G. Internal Dissemination of Policy (41 CFR 60-741.44(g); 250.44(g))

In an effort to promote positive affirmative action for individuals with a disability and qualified covered veterans, UNT Health Science Center has developed internal communications that foster understanding, acceptance, and support among UNT Health Science Center's executive, management, and supervisory personnel. Additionally, all other UNT Health Science Center employees have been notified and encouraged to take the necessary action to aid the institution in meeting its affirmative action obligations. UNT Health Science Center has informed its employees and applicants for employment of its commitment to engage in affirmative action to increase the employment opportunities for qualified individuals with a disability and qualified covered veterans.

UNT Health Science Center realizes that a strong outreach program is ineffective without the adequate internal support from management personnel and other employees. In order to assure greater employee cooperation and participation in UNT Health Science Center's affirmative action efforts, the institution has adopted and disseminated an internal policy. This policy has been implemented as follows:

- 1) The policy is included in the UNT Health Science Center Personnel Policies and Procedures Manual.
- 2) The policy has been publicized in s newsletter(s) and annual reports.
- 3) The policy has been and will continue to be discussed at employee meetings.
- 4) The policy has been and will continue to be discussed in both employee orientation and management training programs.
- 5) The policy will be included in publication articles concerning accomplishments of the Health Science Center's workers with a disability and qualified covered veterans.

- 6) The policy is posted on UNT Health Science Center bulletin boards. A statement that employees and applicants are protected from coercion, intimidation, interference, or discrimination for filing a complaint or assisting in an investigation under the 1973 Rehabilitation Act, the 1974 Vietnam Era Veterans' Readjustment Assistance Act, the Veterans Employment Opportunity Act of 1998 or Job for Veterans Act of 2002 is contained with the policy.

H. Audit and Reporting System (41 CFR 60-741.44(h); 250.44(h))

UNT Health Science Center has designed and implemented audit and reporting systems that:

- 1) Measure the effectiveness of the institution's programs.
- 2) Indicate any need for remedial action.
- 3) Determine the degree to which the institution's objectives have been obtained.
- 4) Determine whether all employees identified as persons with a disability and qualified covered veterans have had the opportunity to participate in all UNT Health Science Center sponsored educational, training, recreational, and social events.
- 5) Ensure that each location of UNT Health Science Center is in compliance with the 1973 Rehabilitation Act, the 1974 Vietnam Era Veterans' Readjustment Assistance Act, Veterans Employment Opportunity Act of 1998, Jobs for Veterans Acts of 2002, applicable OFCCP regulations, and this Affirmative Action Program.

I. Responsibility for Implementation (41 CFR 60-741.44(i); 250.44(i))

The EEO Administrator is responsible for the overall execution, implementation and monitoring of the affirmative action plan for persons with a disability and qualified covered veterans with the support of all management.

Those responsibilities shall include, but not be limited to, the following:

- 1) Informing management of all new developments and opportunities affecting persons with a disability and qualified covered veterans employment.
- 2) Assisting top management in arriving at solutions to problems involving persons with a disability and qualified covered veterans.
- 3) Serving as a liaison with federal, state, or local agencies, and national disabled and qualified covered veteran's organizations.
- 4) Insuring that persons with a disability and qualified covered veterans are afforded full opportunity and encouraged to participate in all institution educational, training, and career opportunity programs.
- 5) Conducting regular discussions with local managers, supervisors, and employees to assure that the institution's policies are fair and consistent.

J. Training (41 CFR 60-741.44(i); 250.44(i))

All personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes shall be trained to ensure that the commitments in UNT Health Science Center's affirmative action program are implemented.

15. EQUAL EMPLOYMENT OPPORTUNITY POLICY ON RELIGION NATIONAL ORIGIN

Pursuant to the guidelines prohibiting discrimination on the basis of religion or national origin, 41 C.F.R. 60-50.1, et seq., UNT Health Science Center hereby reaffirms that it does not discriminate against employees, or applicants for employment, because of religion or national origin. UNT Health Science Center takes affirmative action to ensure that employees, or applicants for employment, are treated without regard to their religion or national origin. Such action includes, but is not necessarily limited to the following: employment, upgrading, demotion, transfer, recruitment, recruitment advertising, layoff, termination, rates of pay (or other forms of compensation), and selection for training.

UNT Health Science Center has reviewed its employment practices and determined that all of its employees, including those who belong to religious or ethnic groups, have received fair consideration for all job opportunities. Special attention has been directed toward executive and middle management levels. At this time, there are no deficiencies. Based upon the review, UNT Health Science Center will continue to undertake the following recruitment activities:

1. A specific policy directive will be communicated to all employees reaffirming the UNT Health Science Center's obligation to provide equal employment opportunity without regard to religion or national origin. This policy will be communicated in such a manner as to foster understanding, acceptance, and support among UNT Health Science Center's executives, managers, supervisors, and all other employees, and to encourage such persons to take the necessary action to aid UNT Health Science Center in meeting its obligations.

2. UNT Health Science Center has developed internal procedures to ensure that our obligation to provide equal employment opportunity, without regard to religion or national origin, is being fully implemented. All employment activities are reviewed by UNT Health Science Center's EEO Administrator, Cheryl K. Wells or her designee.
3. On an annual basis, UNT Health Science Center informs all management employees of our commitment to equal employment opportunity for all persons, without regard to religion or national origin.

UNT Health Science Center acknowledges its responsibility to make reasonable accommodations

for the religious observances and practices of its existing or prospective employees. An accommodation for religious purposes will only be denied should UNT Health Science Center determine that we would have to suffer undue hardship. Ms. Wells will make the final determination regarding any request for an accommodation. During this accommodation evaluation, the following factors will continue to be considered:

1. Business necessity
2. Financial costs and expenses; and
3. Resulting personnel problems