## **AFFIRMATIVE ACTION PROGRAMS**

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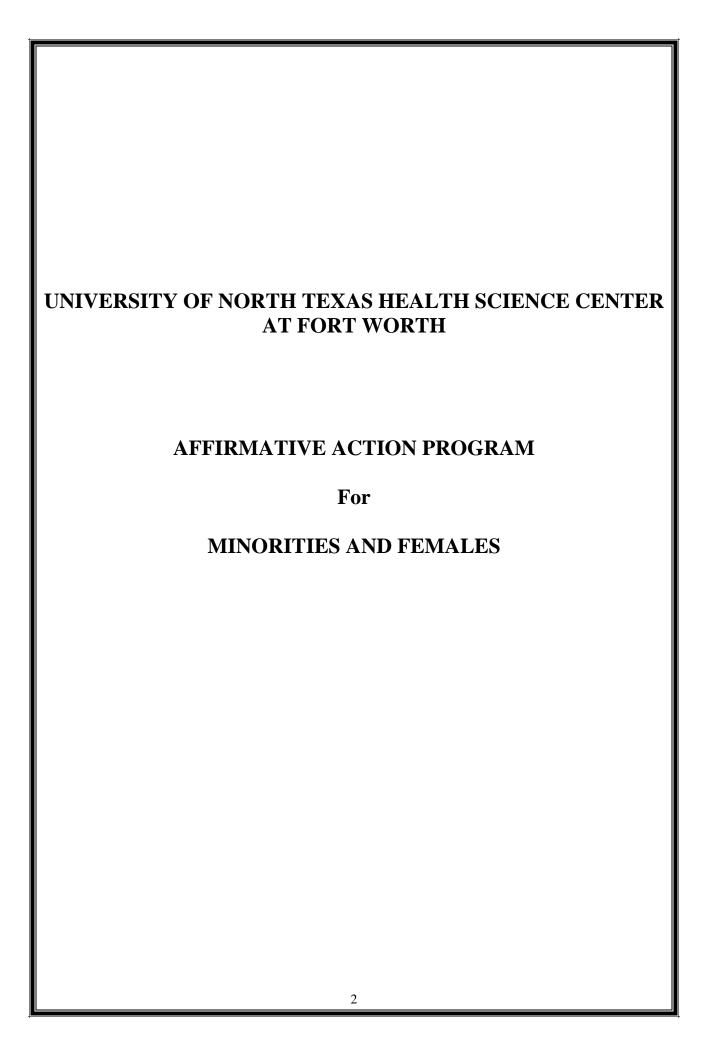
Director Equal Employment Opportunity

**President**: Scott Ransom, D.O.

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

Fort Worth, TX

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



# UNIVERSITY OF NORTH TEXAS HEALTH SCIENCE CENTER AT FORT WORTH

## AFFIRMATIVE ACTION PROGRAM FOR MINORITIES AND FEMALES

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### **EEO Policy Statement**

The following EEO Policy statement is posted on UNT Health Science Center's bulletin board as well as placed where applicants can view it.

- 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 because he or she is a special disabled veteran, newly separated veteran, a campaign veteran, or an armed forces service medal veteran (i.e., qualified protected veterans) 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, terminations, UNT Health Science Center sponsored training, and social and recreational programs shall be administered without regard to race, color, religion, national origin, sex, age, disability or qualified protected 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, or protected veterans 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 between 8:00AM and 5:00PM at the Human Resource Services/EEO department. 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 and confidential and will not result in retaliation of any sort.
- 7. Employees are invited to self-identify as an individual with a disability or protected veteran status. 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, or any other federal, state or local law requiring equal opportunity for disabled persons or qualified protected 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 qualified individuals with disabilities and qualified protected 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.

Scott Ransom, D.O., President UNT Health Science Center

## II. Establishment of Responsibilities for Implementation of the Written Affirmative Action Program (41 CFR 60-2.17(a)

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

The EEO Administrator has the primary management responsibility, authority, and resources for ensuring full compliance with the provisions of E.O. 11246, as amended, and it's implementing regulations. The EEO Administrator's appointment and a description of the position's basic responsibilities have been communicated to all levels of personnel in the UNT Health Science Center. The responsibilities of the EEO Administrator include, but are not necessarily limited to, the following:

- 1. Developing Equal Employment Opportunity (EEO) policy statements, affirmative action programs, and internal and external communication procedures;
- 2. Assisting in the identification of AAP/EEO problems;
- 3. Assisting management in arriving at effective solutions to AAP/EEO problems;
- 4. Designing and implementing an internal audit and reporting system that:
  - a. Measures the effectiveness of UNT Health Science Center's program;
  - b. Determines the degree to which AAP goals and objectives are met; and
  - c. Identifies the need for remedial action;
- 5. Keeping UNT Health Science Center's management informed of equal opportunity progress and reporting potential problem areas within UNT Health Science Center through reports;
- 6. Reviewing UNT Health Science Center's AAP for qualified minorities and women with management to ensure that the policy is understood and is followed in all personnel activities;
- 7. Auditing the contents of UNT Health Science Center's bulletin board to ensure compliance information is posted and up-to-date; and
- 8. Serving as liaison between UNT Health Science Center and enforcement agencies.

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

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

- 1. Assisting in the identification of problem areas, formulating solutions, and establishing departmental goals and objectives when necessary;
- 2. Reviewing the qualifications of all applicants and employees to ensure qualified individuals are treated in a nondiscriminatory manner when hiring, promotion, transfer, and termination actions occur; and
- 3. Reviewing the job performance of each employee to assess whether personnel actions are justified based on the employee's performance of his or her duties and responsibilities.

### III. Identification and Correction of Problem Areas (41 CFR 60-2.17(b)

The UNT Health Science Center performs in-depth analysis of its total employment process to determine if there are areas where minority and/or female groups face impediments to equal opportunity. The following analyses are conducted in order to reveal any potential problem areas:

Placement Goals: An analysis of incumbency versus availability is performed in order to
determine if there are any job groups where underutilizations exist for females and/or
minorities. Where a significant shortfall does exist, as defined by the methodology the UNT
Health Science Center uses to determine underutilization, Placement Goals are set (see the
Placement Goals report which follows this section).

For job groups that have Placement Goals, steps will be taken in order to increase the percentage of qualified females and/or minorities applying for positions both externally and internally. These steps may include but are not limited to the following:

- 1. Recruiting at colleges and universities with a significant percentage of minority and female students;
- 2. Publishing job advertisements in newspapers and/or magazines that target females and/or minorities;
- 3. Offering mentorship programs for female and minority employees;
- 4. Offering job training for advancement of females and minorities currently employed by UNT Health Science Center in order to increase their chances of advancing within UNT Health Science Center:
- 5. Offering tuition reimbursement to employees to obtain training that will increase their chances of advancing within UNT Health Science Center at Fort Worth;
- 6. Using recruitment companies that specifically target females and minorities; and
- 7. Continuing to use the services of our state employment office.
- Review of Employment Decisions: Review of employment decisions are made in order to determine whether or not females/minorities are selected at a less favorable rate than males/non-minorities.

3. Review of Hires/Promotions: Whenever females/minorities are selected at a lower rate than males/non-minorities, a review of the applicant flow is conducted to determine possible reasons why females/minorities were not selected at a more favorable rate. If the UNT Health Science Center is not attracting enough females/minorities that fit the qualifications for the job groups, good faith efforts will be put into place to attempt to improve the applicant flow of qualified females/minorities.

**Review of Terminations:** For non-voluntary terminations, if females/minorities are being terminated at a higher rate than males/non-minorities, a review of the employee files will be made to ensure that the UNT Health Science Center is applying its policies and procedures for termination equally for protected as well as non-protected classes. Exit interviews are also reviewed to confirm voluntary reasons for leaving the UNT Health Science Center.

4. **Compensation:** Annually compensation is reviewed in order to determine if there are any discrepancies in pay when comparing female to male rates of pay or minorities versus non-minorities rates of pay. If on average females and/or minorities are being paid less within the same salary grade/band and/or job title, a review if the difference can be explained away by taking into consideration factors such as time in the job, prior work experience, performance ratings, education, etc. If the difference in pay cannot be justified, the UNT Health Science Center will put a plan in place to rectify the difference in pay for the protected class member(s).

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

The UNT Health Science Center developed action-oriented programs (see Section V) designed to accomplish the established goals and objectives, thereby enhancing the employment and advancement opportunities in the UNT Health Science for females and minorities.

#### Job Group H1.1 Managers/Assistant/Associate – Minority

Black 12.16 availability vs. 6.82 utilization
Asian 4.08 availability vs. 0 utilization
Native American 1.00 availability vs. 0 utilization
Hispanic 11.87 availability vs. 9.09 utilization

UNT Health Science Center will target area educational institutions that have a large minority enrollment and attempt to participate in any Job Fairs these institutions offer. UNT Health Science Center will advertise openings through professional magazines that target minorities, specifically Black, Asian, Native American, and Hispanic. UNT Health Science Center will research training opportunities to be offered.

### Job Group H1.2 Directors – Minority

Black 9.17 availability vs. 4.44 utilization

Asian 2.19 availability vs. 0 utilization

Native American 0.95 availability vs. 0 utilization

Hispanic 6.89 availability vs. 2.22 utilization

UNT Health Science Center will target area educational institutions that have a large minority enrollment and participate in any Job Fairs these institutions offer. UNT Health Science Center will advertise openings through professional magazines that target minorities, specifically Black, Asian, Native American, and Hispanic. UNT Health Science Center will research training opportunities to be offered.

### Job Group H1.3 Executive – Female – Minority

Female – availability 54.22 vs. 17.29 utilization

Black – 10.07 availability vs. 0 utilization

Native American 0.82 availability vs. 0 utilization

Hispanic 7.12 availability vs. 4.35 utilization

UNT Health Science Center will target area educational institutions that have a large female and minority enrollment and participate in recruitment efforts involving these institutions. UNT Health Science Center will advertise openings through professional magazines that target female and minority candidates, specifically black, Native American, and Hispanic.

#### **Job Group H2-2 Mid Level Faculty – minority**

Black – availability 4.93 vs. 2.22 utilization

Native American 0.76 availability vs. 0 utilization

UNT Health Science Center will target educational institutions that have a large minority enrollment and participate in recruitment efforts involving these institutions. UNT Health Science Center will advertise openings through professional magazines that target minority candidates, specifically Black and Native American.

### Job Group H2-3 Senior Faculty – Female

Female availability 46.59 availability vs. 7.69 utilization

UNT Health Science Center will target educational institutions that have a large female enrollment and participate in recruitment efforts involving these institutions. UNT Health Science Center will advertise openings through professional magazines that target females.

### Job Group H6.0 – Skilled Crafts – Minorities

Black 6.04 availability vs. 0 utilization

Asian 1.31 availability vs. 0 utilization

Native American 1.10 availability vs. 0 utilization

Hispanic 20.14 availability vs. 11.76 utilization

UNT Health Science Center will participate in recruitment activities including job fairs in which qualified minorities are expected to attend. UNT Health Science Center will advertise openings in prominent places that target minorities qualified for these positions. Additionally, UNT Health Science Center will research training opportunities to be offered.

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.

#### **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 in UNT Health Science Center 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 placement goals are identified in this plan using the **Summary Analysis of Data** section. It is important to note that the job group sections are not categorized in the same manner due to a revision in the manner in which UNT Health Science Center reports this information to comply with OFCCP requirements and recommendations.

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

Action programs have been instituted to eliminate identified problem areas and to help achieve specific affirmative action goals. These programs may include but are not limited to the following:

- 1. Conducting annual analyses of job descriptions to ensure they accurately reflect job functions;
- 2. Making job descriptions available to recruiting sources and available to all members of management involved in the recruiting, screening, selection and promotion processes;
- 3. Evaluating the total selection process to ensure freedom from bias through:
  - Reviewing job applications and other pre-employment forms to ensure information requested is job-related;
  - b. Evaluating selection methods that may have a disparate impact to ensure that they are jobrelated and consistent with business necessity;
  - c. Training personnel and management staff on proper interview techniques; and
  - d. Training in EEO for management and supervisory staff;
- 4. Using techniques to improve recruitment and increase the flow of qualified minority and female applicants. The UNT Health Science Center may undertake the following actions:
  - Include the phrase "Equal Opportunity/Affirmative Action Employer" or other acceptable tagline in all printed employment advertisements;
  - Place help wanted advertisement, when appropriate, in local minority news media and women's interest media;
  - c. Disseminate information on job opportunities to organizations representing minorities, women and employment development agencies when job opportunities occur;

- d. Encourage all employees to refer qualified applicants;
- Actively recruit at secondary schools, junior colleges, colleges and universities with predominantly minority or female enrollments; and
- f. Request employment agencies to refer qualified minorities and women;
- 5. Preparing a self-audit of the UNT Health Science Center at Fort Worth's compensation practices;
- 6. Ensuring that all employees are given equal opportunity for promotion. This is achieved by:
  - a. Posting promotional opportunities;
  - Offering counseling to assist employees in identifying promotional opportunities, training and educational programs to enhance promotions and opportunities for job rotation or transfer; and
  - c. Evaluating job requirements for promotion.

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

The UNT Health Science Center believes that one of the most important elements in effectively implementing a written Affirmative Action Program 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. The UNT Health Science Center's audit and reporting system is designed to:

- 1. Measure the effectiveness of the AAP/EEO program;
- 2. Document personnel activities;
- 3. Identify problem areas where remedial action is needed; and
- 4. Determine the degree to which the UNT Health Science Center's AAP goals and objectives have been obtained.

The following personnel activities are reviewed to ensure nondiscrimination and equal employment opportunity for all individuals without regard to their race, color, gender, religion, national origin:

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

The following documents are maintained as a component of University of North Texas Health Science Center at Fort Worth's internal audit process:

- 1. An applicant flow log showing the name, race, sex, date of application, job title, interview status and the action taken for all applicants for job opportunities;
- 2. Summary data of external job offers and hires, promotions, resignations, terminations, and layoffs by job group and by sex and minority group identification;
- 3. Summary data of applicant flow by identifying, at least, total applicants, total minority applicants, and total female applicants for each job group;
- 4. Maintenance of employment applications; and
- 5. Records pertaining to University of North Texas Health Science Center at Fort Worth's compensation system.

The UNT Health Science Center's audit system includes periodic reporting which documents the UNT Health Science Center's efforts to achieve its EEO/AAP responsibilities. Managers and supervisors are asked to report any current or foreseeable EEO problem areas and are asked to outline theirs suggestions/recommendations for solutions. If problem areas arise, the manager or supervisor is to report problem areas immediately to the EEO Administrator. During the reporting cycle, the following occurs:

- 1. The EEO Administrator will discuss any problems relating to significant rejection ratios, EEO charges, etc., with management; and
- 2. The EEO Administrator will report the status of University of North Texas Health Science Center at Fort Worth's AAP goals and objectives to management. The EEO Administrator will recommend remedial actions for the effective implementation of the AAP.

THE UNIVERSITY OF NORTH TEXAS HEALTH SCIENCE CENTER AT FORT WORTH
AFFIRMATIVE ACTION PROGRAM For
QUALIFIED INDIVIDUALS WITH DISABILITIES AND QUALIFIED PROTECTED VETERANS

## THE UNIVERSITY OF NORTH TEXAS HEALTH SCIENCE CENTER AT FORT WORTH

# AFFIRMATIVE ACTION PROGRAM FOR QUALIFIED INDIVIDUALS WITH DISABILITIES AND QUALIFIED PROTECTED VETERANS

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I.	Affirmative Action Program for Qualified Individuals with Disabilities and
	<b>Qualified Protected Veterans</b>

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.

## II. 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 the UNT Health Science Center to provide equal employment opportunities and to advance in employment disabled veterans, newly separated veterans, campaign veterans, and armed forces service medal veterans (i.e. qualified protected veterans). This policy is designed to employ and advance all qualified individuals with a disability and qualified protected veterans at all levels of employment, including the executive level. The UNT Health Science Center's policy of providing equal employment opportunities to qualified persons with a disability and qualified protected 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. The 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.

The UNT Health Science Center's Affirmative Action Program for qualified persons with a disability and qualified protected veterans is reviewed and updated annually. If there are any significant changes in UNT Health Science Center's 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, The UNT Health Science Center invites all qualified protected veterans who are either employees, or who were applicants for employment, and employees who are persons with a disability or qualified protected veterans with a disability, and who wish to benefit under UNT Health Science Center's 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 disabled veterans or qualified protected 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 disabled veterans or qualified protected 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.

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

The UNT Health Science Center reviews annually its personnel processes to determine whether its present procedures ensure careful, thorough and systematic consideration of the qualifications of known qualified individuals with disabilities and qualified protected veterans. This review covers all procedures related to the filling of job vacancies either by hire or by promotion, as well as all training opportunities offered or made available to employees.

In determining the qualifications of veterans, The UNT Health Science Center limits its consideration of a qualified protected veteran's military record, including discharge papers, to only that portion of the record, which is relevant to the specific job qualifications for which the veteran is being considered.

Based upon UNT Health Science Center's review of its personnel processes, UNT Health Science Center will modify the personnel processes when necessary, and will include the development of new procedures in this Affirmative Action Program to ensure equal employment opportunity.

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

The physical and mental job qualifications of all jobs were reviewed during the plan period to ensure that, to the extent that such qualification requirements tend to screen out qualified individuals with disabilities and qualified disabled veterans, job qualifications are consistent with business necessity and the safe performance of the job.

No qualification requirements were identified which had a screening effect. All job qualification requirements were found to be job-related and consistent with business necessity and safety.

The UNT Health Science Center will continue to review physical and mental job qualification requirements whenever a job is vacated and UNT Health Science Center intends to fill it through either hiring, promotion or transfer and will conduct a qualifications review whenever job duties change.

If at any time UNT Health Science Center should inquire into an employee's physical or mental condition or should conduct a medical examination prior to a change in employment status, UNT Health Science Center affirms that information obtained as a result of the inquiry will be kept confidential, except as otherwise provided for in the Section 503 regulations. The results of the examination or inquiry will be used in accordance with the Section 503 regulations as follows:

- 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 protected 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 protected veteran might require emergency treatment.
- 3. OFCCP officials investigating compliance with either the 1973 Rehabilitation Act, VEVRAA, Veterans Employment Opportunity Act of 1998, or Job for Veterans Act of 2002 will be informed.

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

It is the 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 protected veterans, unless his/her accommodation imposes an undue hardship on UNT Health Science Center's business (41 C.F.R. – 741.44(d); 250-44(d)). In determining the extent of UNT Health Science Center'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. University of North Texas Health Science Center at Fort Worth makes every effort to provide suitable employment for those employees who become disabled while employed by us.

## VI. Harassment Prevention Procedures (41 CFR 60-741.44(e); 250.44(e))

Employees of and applicants to the UNT s Health Science Center will not be subject to harassment, intimidation, threats, coercion, or discrimination because they have engaged or may engage in filing a complaint, assisting in a review, investigation, or hearing or have otherwise sought to obtain their legal rights related to any federal, state, or local law regarding EEO for qualified individuals with disabilities or qualified protected veterans. Any employees or applicants who feel that they have been subject to harassment, intimidation, threats, coercion, or discrimination because of their disability or status as a qualified protected veteran should contact the EEO Administrator for assistance. This policy is posted for employees and applicants to view.

# VII. 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 the UNT Health Science Center at Fort Worth provide the required affirmative action for the employment and the advancement of qualified individuals with a disability and qualified protected veterans, the UNT Health Science Center may undertake the following outreach and positive recruitment activities:

- The UNT Health Science Center notified all subcontractors, vendors and suppliers of UNT
  Health Science Center's EEO and AA policy regarding the employment of qualified
  individuals with disabilities and qualified protected veterans.
- 2. All recruiting sources, including State employment agencies, educational institutions and social service agencies have been informed of UNT Health Science Center's policy concerning the employment of qualified individuals with disabilities and qualified protected veterans and have been advised to actively recruit and refer qualified persons for job opportunities.
- 3. The UNT Health Science Center lists all suitable employment openings with the appropriate local office of the State Employment Service and maintains regular contact with the local Veterans Employment Representative.
- 4. The UNT Health Science Center may consider holding formal briefing sessions to invite representatives from recruitment sources and placement agencies to tour the facility, discuss current and prospective position openings, job descriptions and required qualifications and explanations of UNT Health Science Center's selection procedures.
- 5. The UNT Health Science Center may consider participating in local job fairs sponsored by support groups for qualified individuals with disabilities and qualified protected veterans
- 6. The equal employment opportunity clause concerning the employment of qualified individuals with disabilities and qualified protected veterans are included in all nonexempt subcontracts and purchase orders.

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

In an effort to promote positive affirmative action for qualified individuals with a disability and qualified protected veterans, the 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 UNT Health Science Center in meeting its affirmative action obligations. The 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/or qualified protected veterans.

The 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, UNT Health Science Center has adopted and disseminated an internal policy. This policy's dissemination may include, but is not limited to, the following:

- 1. Copies of our AAP will be made available for inspection to any employee or applicant upon request to promote understanding, acceptance and support.
- 2. Policies are re-emphasized to managers and supervisors annually.
- 3. The UNT Health Science Center's Affirmative Action policy and the EEO poster are posted on bulletin boards located throughout our facilities and work areas.
- 4. All applicants who believe they are a qualified individual with a disability, as defined in Section 503 of the Rehabilitation Act of 1973, as amended, or who are a qualified protected veteran under the equal employment opportunity provisions of VEVRAA, as amended, have been invited to identify themselves if they wish to benefit under this affirmative action program. Such invitation has been posted on bulletin boards throughout the facility and work areas. Employees may self-identify at anytime.
- 5. All employees are advised annually of the UNT Health Science Center's policy and encouraged to aid in UNT Health Science Center's affirmative action efforts to ensure a fair and effective program.
- Briefing sessions are conducted routinely for managers and supervisors to review the
  applicable regulations and to discuss such affirmative action measures as training and
  reasonable accommodation.

7	When making internal Equal Opportunity audits, implementation of this affirmative action program will be reviewed.
8	. Articles (and pictures) regarding accomplishments of employees who are qualified individuals with disabilities and qualified protected veterans shall be included in company
	and/or facility publications whenever available.
9	. At least once a year the policy is communicated and/or distributed to all employees.
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## IX. Audit and Reporting System (41 CFR 60-741.44(h); 250.44(h))

University of North Texas Health Science Center at Fort Worth has designed and implemented audit and reporting systems that:

- Measure the effectiveness of University of North Texas Health Science Center at Fort Worth's programs;
- 2. Document personnel activities;
- 3. Identify problem areas where remedial action is needed; and
- 4. Determine the degree to which University of North Texas Health Science Center at Fort Worth's AAP goals and objectives have been obtained.

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

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

University of North Texas Health Science Center at Fort Worth's audit system includes periodic reports documenting University of North Texas Health Science Center at Fort Worth's efforts to achieve 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. During the reporting, the following occurs:

- The EEO Coordinator will discuss any problems relating to significant rejection ratios, EEO charges, etc., with management; and
- 2. The EEO Coordinator will report the status of University of North Texas Health Science Center at Fort Worth's AAP goals and objectives to management. The EEO Coordinator will recommend remedial actions for the effective implementation of the AAP.

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

**A. Responsibilities of EEO Administrator**: The EEO Administrator is responsible for the overall execution, implementation and monitoring of the Affirmative Action Program for persons with a qualified disability and qualified protected veterans with the support of all management.

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

- 1. The development of the AAP for individuals with disabilities and protected veterans, policy statements, personnel policies and procedures, internal and external communication of the policy, and monitoring the effectiveness of these actions;
- Reviewing all personnel actions, policies, and procedures to ensure compliance with University of North Texas Health Science Center at Fort Worth's affirmative action obligations;
- 3. Reviewing the qualifications of all applicants and employees to ensure qualified individuals are treated in a nondiscriminatory manner when hiring, promotion, transfer and termination actions occur;
- 4. Assisting in the identification of problem areas and the development of solutions to those problems;
- 5. Monitoring the effectiveness of the program on a continuing basis through the development and implementation of an internal audit- and reporting- system that measures the effectiveness of the program.
- Keeping management informed of equal opportunity progress and problems within University of North Texas Health Science Center at Fort Worth through, at a minimum, periodic reports;
- 7. Providing department managers with a copy of the AAP for Qualified Individuals with Disabilities and Qualified Protected Veterans and reviewing the program with them on an annual basis to ensure knowledge of their responsibilities for implementation of the program;
- 8. Reviewing University of North Texas Health Science Center at Fort Worth's AAP for qualified individuals with disabilities and qualified protected veterans with all managers and supervisors at all levels to ensure that the policy is understood and is followed in all personnel activities;
- 9. Auditing the contents of company bulletin boards annually to ensure that compliance information is posted and is up-to-date;

- 10. Serving as liaison between University of North Texas Health Science Center at Fort Worth and enforcement agencies; and
- 11. Serving as liaison between University of North Texas Health Science Center at Fort Worth and organizations for qualified individuals with disabilities and qualified protected veterans.
- **B.** Responsibilities of Managers and Supervisors: Managers and supervisors are advised annually of their responsibilities under University of North Texas Health Science Center at Fort Worth's AAP for qualified individuals with disabilities and qualified protected veterans and of their obligations to:
  - Review University of North Texas Health Science Center at Fort Worth's Affirmative
    Action policy for qualified individuals with disabilities and qualified protected veterans
    with subordinate managers and supervisors to ensure that they are aware of the policy and
    understand their obligation to comply with it in all personnel actions;
  - 2. Assist in the identification of problem areas, formulate solutions, and establish departmental goals and objectives when necessary;
  - 3. Review the qualifications of all applicants and employees to ensure qualified individuals are treated in a nondiscriminatory manner when hire, promotion, transfer, and termination actions occur; and
  - 4. Review all employees' performance to ensure that non-discrimination is adhered to in all personnel activities.

XI. Training (41 CFR 60-741.44(j); 250.44(j))
All personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes shall be trained to ensure that the commitments in University of North Texas Health Science Center at Fort Worth's affirmative action program are implemented.