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WEST CHESTER
UNIVERSITY



2022 **affirmative action plan**

WEST CHESTER UNIVERSITY



**Affirmative Action Plan (AAP)
for Minorities, Females, Persons with Disabilities,
and Qualified Covered Veterans**

Plan Date:
November 1, 2021 – October 31, 2022

Prepared and Approved by:

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Approved by:

A handwritten signature in blue ink that reads "Chris Fiorentino".

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**AFFIRMATIVE ACTION PLAN (AAP)
FOR FEMALES, MINORITIES, PERSONS WITH DISABILITIES, AND
QUALIFIED COVERED VETERANS**

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I. PRELIMINARY STATEMENT & DEFINITIONS

The Civil Rights Act of 1964, 42 U.S.C. 2000(e) prohibits discrimination in employment on the basis of race, color, religion, sex, or national origin. The Act was amended in 1972 to apply to employment by state agencies, to education institutions, and to faculty employment. In order to carry out this national policy, the President of the United States directed by Executive Order 11246, and amended by Executive Order 11375, that all federal agencies should place an “affirmative action clause” in every contract in excess of \$50,000 and employers with at least 50 employees. Anyone entering into a contract with the United States, even if not otherwise obligated by law, must agree to comply with the substance of the Civil Rights Act of 1964. West Chester University is fully committed to the concept and practice of equal opportunity and affirmative action in all aspects of employment. The University has prepared this Affirmative Action Plan (AAP) voluntarily as a reaffirmation of its commitment to equal employment opportunity and affirmative action (EEO/AA).

Institutions receiving more than \$50,000 in federal contracts annually and employing greater than 50 employees are required to have a written AAP for women and minorities. The principle objectives of West Chester University’s AAP are (1) to offer and make the best possible use of all available human resources, and to increase the employment opportunities of minorities and women at all levels and in all departments of the University, and (2) to comply with all applicable governmental laws and regulations relating to nondiscrimination and affirmative action in employment, specifically Executive Order 11246, as amended, and as detailed in the implementing regulations, 41 CFR Chapter 60 by the U.S. Department of Labor, Office of Federal Contract Compliance Programs (OFCCP).

In the preparation of this AAP, the University has used the terminology used in Executive Order 11246 and its implementing regulations as a guide. Therefore, the use of such terms as “current underutilization”, “placement/class goals”, “underutilized”, etc. should not be construed as an admission by the University, in whole or in part, that in fact either minorities or women have been or are presently being underutilized, concentrated, or discriminated against in any way by the University in violation of federal, state, or local fair employment practice laws. Furthermore, nothing contained in this AAP or its supporting data should be construed as an admission by the University, in whole or in part, that it has contravened such federal, state, or local employment practice laws.

The included narrative and statistical analysis, the identification of problem areas, and the establishment of goals and timetables are required components as set out in the aforementioned regulations. Goals and timetables in the context of the implementing regulations that the University 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 the plan. The use of goals in the plan is not intended, nor is the effect of such goals intended, to discriminate against an individual or group of individuals with respect to any employment opportunities for which he, she, or they are qualified on the grounds that he, she or they are not beneficiaries of affirmative action themselves. Indeed, nothing herein is intended to sanction the discriminatory treatment of any person.

Key Terms and Definitions:

General Terms –

- **Executives** – Senior, non-represented managers classified at management level 200 and above.
- **Faculty** - Instructors, Assistant, Associate and Full Professors
- **Staff** - Non-represented managers classified at management level 190 and below, and all other employees represented by collective bargaining agreements (student employees and graduate assistants are not included).

- **Workforce** - Executives, faculty and staff (as defined above) employed as of October 31, 2021.

Race and Ethnicity Definitions –

- **White (Not of Hispanic Origin)** – all people having origins in any of the original peoples of Europe, North Africa, or the Middle East.
- **Black (Not of Hispanic Origin)** – all people having origins in any of the Black racial groups of Africa.
- **Hispanic or Latino** – all people having Puerto Rican or Mexican origins, or all people of Cuban, Central or South American, or other Spanish culture or origin, regardless of race.
- **Asian** – all people in the groups of Asian/Pacific islander; Asian (all people having origins in any of the original peoples of China, Japan, Korea, Eastern Asia, Southeast Asia, the Indian subcontinent (including Pakistan) or the Pacific islands including the Philippines and Samoa).
- **Native American** – Native American Indian or Alaska Native (all people having origins in any of the original peoples of North America and who maintain cultural identification through tribal affiliation or community attachment).
- **Two or More Races** – all persons identifying with 2 or more of the following races: White, Black, Asian, Hispanic or Native American.

Veteran Definitions - For the purposes of this AAP, the term “Protected Veteran” shall be defined as follows, according to the VEVRAA regulations:

- **Active Duty Wartime or Campaign Badge Veteran** - means a veteran who served on active duty in the U.S. military, ground, naval, or air service during a war or in a campaign or expedition for which a campaign badge has been authorized, under the laws administered by the U. S. Department of Defense.
- **Armed Forces Service Medal Veteran** - means any veteran who, while serving on active duty in the U.S. military, ground, naval, or air service, participated in a United States military operation to which an Armed Forces service medal was awarded pursuant to Executive Order 12985.
- **Disabled Veteran** - means 1) A veteran of the U. S. military, ground, naval, or air service who is entitled to compensation (or who but for the receipt of military retired pay would be entitled to compensation) under laws administered by the Secretary of Veterans Affairs, or 2) A person who was discharged or released from active duty because of a service- connected disability.
- **Protected Veteran** - means a veteran who is protected under the non-discrimination and affirmative action provisions of VEVRAA; specifically, a veteran who may be classified as a “disabled veteran,” “recently-separated veteran,” “active duty wartime or campaign badge veteran,” and/or an “Armed Forces Service Medal Veteran” as defined by this AAP and VEVRAA.
- **Recently-Separated Veteran** - means any veteran during the three-year period beginning on the date of such veteran’s discharge or release from active duty in the U.S. military, ground, naval, or air service.

II. MISSION, VISION, AND VALUES STATEMENTS

MISSION STATEMENT

West Chester University is a community of educators that develops graduates to succeed personally and professionally and contribute to the common good.

WCU GRADUATES WILL:

- Apply scientific reasoning and demonstrate quantitative and qualitative literacy
- Collaborate with others to solve problems and address societal needs
- Communicate effectively and participate in civic discourse
- Engage inclusively in a diverse society
- Understand the ethical implications of decisions and the world in which they live

INSTITUTIONAL GOALS:

To fulfill its mission as a public institution serving the Commonwealth, West Chester University will focus on student success and institutional improvement as measured by the degree to which WCU demonstrates:

- Access to learning
- Community and cultural engagement
- Continuous improvement
- Critical thinking
- Inclusion
- Scholarly and creative activities
- Sustainability

VISION STATEMENT

West Chester University will be a national model for excellence for public regional comprehensive universities and especially noted for:

- Undergraduate programs that actively engage students in connecting the life of the mind to the world in which they live and work.
- The responsiveness of its graduate and post-baccalaureate programs to regional needs.
- Its focus on providing lifelong-learning, technical, and applied skills essential to graduates' success now and in the future.
- A commitment by faculty, staff, and administrators to provide access and to serve effectively the educational needs of a diverse student body.
- Its role as a leading educational and cultural resource and partner in fostering the economic, social, and cultural vitality of southeastern Pennsylvania.

VALUES STATEMENT

West Chester University is committed to attracting, enrolling, and graduating quality students from a wide variety of educational, cultural, and economic backgrounds. This endeavor requires the University to attract and retain highly qualified faculty and staff and to provide each member of the University community with learning and leadership development opportunities. To this end, the University supports and encourages programs which benefit all people and which seek to eradicate discrimination and injustice. We treasure what we believe to be the highest principles of American society: the worth and uniqueness of each individual, the belief that success is to be earned by individual effort put forth in an environment founded on equality of opportunity, and the appreciation of the ideal of an inclusive society. We believe that it is incumbent upon all members of our community - staff, students, faculty and administrators - to conduct themselves with civility toward one another at all times. We value the special talents and contributions of each member of our community. We further affirm the worth and dignity of each member and the shared responsibility of all to treat each other as individuals, with respect and courtesy.

As a university owned by the citizens of Pennsylvania, we value our mission to provide the best educational opportunities possible which will enable the University community to successfully address the concerns of a global society. To this end, West Chester University seeks to provide diligent advising

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for students and to focus on teaching students to think clearly and critically, to make logical and ethical judgments, and to communicate effectively with others.

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West Chester University's community strongly supports the principles of academic integrity and academic responsibility, viewing both as the province of every member of the campus community. We hold the highest esteem for teaching directed toward student learning and affirm that mastery of content as well as mastery of teaching skills necessary to communicate such content are paramount.

This values statement is intended to be a living document which will serve West Chester University as it changes and evolves in the coming years.

III. PRESIDENT'S REAFFIRMATION OF COMMITMENT TO EQUAL EMPLOYMENT OPPORTUNITY AND AFFIRMATIVE ACTION (EEO/AA)

West Chester University's Affirmative Action Plan (AAP) arises from the conviction that an institution of higher education should be more than a mere reflection of societal circumstances but should exist as a humane enterprise to advance social development. It is in this spirit that we embark on a program to create a richer, more diverse, inclusive institution.

It is the policy of West Chester University that the recruitment, admission, and retention of students, as well as the recruitment, hiring, promotion, termination and other University relationships with faculty and staff, be nondiscriminatory with respect any protected classes. Additionally, it is the University's policy that no qualified disabled individual, disabled veteran or veteran of the Vietnam Era shall be subject to discrimination in employment or admission to West Chester University.

West Chester University reaffirms its commitment to this policy by recognizing the necessity to:

- a. Maintain or exceed present equity group undergraduate student recruitment rates.
- b. Increase enrollment of underrepresented groups within the graduate student population.
- c. Recruit, hire, promote, develop, and retain equity group faculty and staff as stated in our goals.
- d. Provide reasonable accommodations and auxiliary services for disabled employees and students.
- e. Sensitize and educate the University community to promote a campus free of harassment and discrimination on the basis of any protected category.
- f. Assure that claims of harassment of faculty, staff and students are promptly and appropriately investigated and resolved in a timely manner.
- g. Disseminate the University's EEO/AA Statement.
- h. Assure appropriate monitoring procedures of the AAP.
- i. Increase participation in WCU's Frederick Douglass Scholars Teaching Fellowship program.

Vice Presidents, Deans, Department Chairpersons, and Directors have been apprised of their obligation to adhere to the AAP and implement strategies toward achieving the stated goals of the University. Officers and other constituents of the University, consistent with the shared governance of this institution, are accountable for the decisions, practices and policies that fall within their jurisdiction or sphere of influence.

As President of the University, I have charged other members of the Cabinet and the Vice President for Diversity, Equity, and Inclusion & Chief Diversity & Inclusion Officer and Senior Associate Vice President & Chief Human Resources Officer to monitor the implementation of our AAP; and, as such, the University will implement and administer this policy in accordance with all applicable state and federal laws and regulations.

Any requests to see the University's AAP should be directed to Dr. Tracey Robinson, Vice President for Diversity, Equity, and Inclusion & Chief Diversity & Inclusion Officer, West Chester University, Office for Diversity, Equity & Inclusion, 114 W. Rosedale Ave., West Chester, PA, 19383, (610) 436-2433.

IV. INVITATION TO PARTICIPATE IN AFFIRMATIVE ACTION FOR DISABLED VETERANS, VETERANS OF THE VIETNAM ERA, AND PERSONS WITH DISABILITIES

West Chester University is an equal employment opportunity and affirmative action (EEO/AA) employer and is subject to Section 402 of the Vietnam Era Veterans Readjustment Assistance Act of 1974. This Act requires government contractors to take affirmative action to employ and advance in employment qualified disabled veterans of the Vietnam Era.

The University is also subject to the Uniformed Services Employment and Reemployment Rights Act of 1994. This Act provides reinstatement rights for employees with disabilities related to military service. Employers must make reasonable efforts to accommodate a returning employee's disability or qualify the employee for another position.

West Chester University is also subject to the American with Disabilities Act and Section 503 of the Vocational Rehabilitation Act of 1973. These Acts prohibit discrimination on the basis of disability in all aspects of employment against qualified persons with disabilities that, with reasonable accommodation, can perform the essential functions of a job.

If you are a disabled veteran or a person with a disability covered by these Acts and you would like to be considered under our affirmative action plan, please inform your supervisor or the Associate Vice President for Human Resources. Any information you may provide is voluntary and will not affect your employment status in any way. Information concerning individuals will be kept confidential except that (1) supervisors and managers may be informed regarding work restrictions or job duties of disabled veterans or persons with disabilities as well as necessary accommodations; and (2) medical personnel may be informed, when and to the extent appropriate, if the condition could lead to a need for emergency treatment.

In order to assure the proper placement of all employees, we do request that you provide the following information to your supervisor or the Associate Vice President for Human Resources if you wish to be considered for this affirmative action plan:

If you have a disability which might affect your performance or create a hazard to yourself or others in connection with the job for which you are applying, (1) let your supervisor or the Office of Human Resources know about the skills and procedures you use or intend to use to perform the job notwithstanding the disability; and (2) tell you supervisor or the Associate Vice President for Human Resources about the accommodation we could make which would enable you to perform the job properly and safely. Include any suggestions for equipment, changes in the physical layout of the job, changes in certain duties relating to the job or other accommodations which might be needed and which are reasonable to make.

The full affirmative action plan for veterans and persons with disabilities is available upon request. Please make your request to Dr. Tracey Robinson, Vice President for Diversity, Equity, and Inclusion & Chief Diversity & Inclusion Officer, West Chester University, Office for Diversity, Equity & Inclusion, 114 W. Rosedale Ave., West Chester, PA 19383, (610) 436-2433 between 8:00 a.m. and 4:30 p.m. Dr. Robinson has been delegated responsibility from the President for monitoring the University's EEO/AA programs.

Employees and applicants are protected from coercion, intimidation, interference or discrimination for filing a complaint or assisting in an investigation under these Acts. Again, our goal with this affirmative

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action plan is to ensure that every qualified employee or potential applicant has the opportunity to apply and be considered for job advancement within the University.

V. DISSEMINATION OF POLICY

INTERNAL DISSEMINATION: The University continues to inform employees and students of its equal employment opportunity policy in the following manner:

- University publications and other documents shall contain the appropriate University's equal opportunity statement.
- The contents of the AAP are reviewed annually with the President.
- The Vice President for Diversity, Equity, and Inclusion & Chief Diversity & Inclusion Officer and/or their designee conducts special meetings with the appropriate administrators and other personnel to explain the intent of the AAP and individual responsibilities for effective implementation.
- The federal regulations governing affirmative action are incorporated in the Master Agreement for collective bargaining unit employees.
- The Vice President for Diversity, Equity, and Inclusion & Chief Diversity & Inclusion Officer and/or designee, in collaboration with the Office of Human Resources, meets with all faculty, management, and SUA search committees to explain the search process and to reaffirm the University's commitment to equal employment opportunity and affirmative action.

EXTERNAL DISSEMINATION: The University communicates to prospective employees its commitment to equal employment opportunity and affirmative action in the following ways:

- The affirmative action clause which states "West Chester University is an EEO/AA Institution" is included in advertisements for employment to indicate the affirmative action commitment of the University.
- New and vacant positions are shared with community organizations.
- A non-discrimination clause is incorporated in all purchase orders, leases, contracts, etc., covered by Executive Order 11246, as amended, and its implementing regulations.

VI. UNIVERSITY REPORTS AND ANALYSES

Work Force Analysis (Appendix A)

The full Work Force Analysis is compiled and filed electronically annually as a required component of the AAP. The full analysis serves as an organizational profile and provides a listing of all job titles ranked from the lowest to the highest salary within each department. Headcount information is provided on the total number of employees in each title and number of employees by gender and each identified minority group. For the purpose of this abbreviated document, you will find a modified workforce analysis labeled as "Work Force List" in Appendix A. The analysis provided lays out an alphabetized listing of all University departments, the total employees within each department, and is disaggregated by race and gender. For brevity purposes, Appendix A does not include a complete listing of job titles. To view the entire Work Force Analysis, please contact the ODEI at 610-436-2433.

Job Group Analysis – (Appendix B)

The Job Group Analysis is also completed annually as a required component of the AAP. The report groups job titles by similar content, opportunity, and wage. Placement goals must be established where availability is determined to be greater than the current percentage of women or minorities reported in each job group. In order to determine where placement goals are required it is first necessary to determine availability.

Availability Analysis – (Appendix C)

Availability is determined by estimating the number of qualified minorities and women available for employment in a given job group by completing a two factor analysis; 1) the percentage of minorities or women with requisite skills in geographic areas where the University can reasonably recruit (External availability), and 2) the percentage of minorities or women among those promotable, transferable, and trainable within the organization (Internal Availability). The estimate is expressed as a percentage of all qualified persons available for employment in the job group and is described specifically in the pertinent regulation.

VII. ESTABLISHMENT OF PLACEMENT GOALS

Full utilization is defined, for the purposes of this AAP, as having the same representation in each job group as the calculated availability of women and all minorities, in the area where each department can reasonably expect to recruit. University utilization analyses are used as guides for administrators, charged with AAP implementation, in developing strategies that may most effectively contribute to the successful attainment of University goals.

The University acknowledges that full utilization may not be a realistic one-year goal. Full utilization of job groups where there is low turnover, no anticipated addition of positions or a reduction in force may take an extended period of time to achieve even when women and minorities are selected at optimal rates. OFCCP guidance tells us that goals should not be strict numerical tenets but rather guidelines directing good faith affirmative action efforts. All employment decisions must be made in a non-discriminatory manner. Set-aside programs for certain groups are illegal. Affirmative action plans do not require employers to hire a less qualified person in preference to a more qualified one. The OFCCP also reminds us that quotas are illegal and expressly forbidden.

The University therefore establishes for itself the one-year goal of full utilization or continuous progress toward full utilization and maintaining utilization in those job groups where it has previously been achieved.

VIII. ACCOMPLISHMENT OF PRIOR YEAR PLACEMENT GOALS

The University's search process is designed to accomplish the established goals and objectives, thereby enhancing the employment and advancement opportunities for all employees within the University, including women and members from underrepresented/protected class groups. These efforts resulted in achieving some goals and objectives, making significant progress toward accomplishing others, and strengthening the affirmative action plan overall.

As of October 31, 2021, West Chester University of Pennsylvania has 1884 employees, including 406 minorities and 1085 females. The following narrative discussion analyzes the breakdown of these employees by Job Group. The University goal is to eliminate all areas of underutilization.

AAP FOR WOMEN & MINORITIES**H10: EXECUTIVE AND ADMINISTRATIVE**

The employee complement for the Executive/Administrative job group increased by 3 for a total of 80 people. The percentage of women in this job group is 59%, with availability of 57%, resulting in no underutilization of women in this category. The percentage of total minority employees in this job group is 26%, with availability of 24%, resulting in no underutilization of total minority employees using the Binomial Distribution and Two Standard Deviations test. There is also no underutilization of any specific minority group.

H20: FACULTY

The Faculty complement data indicates a total complement of 1028, which is an decrease of 43 employees from last year. The percentage of women in the Faculty job group is 55%, with availability at 39%, resulting in no underutilization of women. The percentage of minority faculty is 18%, with availability of 13%, resulting in no underutilization of total minority employees in the Faculty job group. There is also no underutilization of any specific minority group.

H30: PROFESSIONAL NON-FACULTY

The total complement for the Professional Non-Faculty job group is 371, which is an increase of 51 from last year. The percentage of women in this job group is 66%, with availability at 58%, resulting in no underutilization of females. Representation of total minorities in this category is at 18%, with availability of 17%, which results in no underutilization of total minorities. There is also no underutilization of any specific minority group.

H40: CLERICAL AND SECRETARIAL

The total complement for the Clerical and Secretarial job group is 150, which is a decrease of 18 from last year. Representation of women in this category is at 91%, with availability at 89%, resulting in no underutilization of women. Representation of minorities is at 17%, with availability at 16%, resulting in no underutilization of total minorities. There is also no underutilization of any specific minority group.

H50: TECHNICAL AND PARAPROFESSIONAL

The total complement for the Technical and Paraprofessional job group is 49, an increase of 9 employees from last year. Representation of women in this category is at 78%, with availability of 91%, resulting in underutilization of women. Minority representation is at 8% with availability at 17%, resulting in underutilization of total minorities.

H60: SKILLED CRAFTS

The total complement in the Craft Workers job group is 49, an decrease of 6 employees from last year. Female representation is 0% with availability of 2%, resulting in no underutilization of women. Minority representation is at 24%, with availability at 13%, resulting in no underutilization of total minorities. There is also no underutilization of any specific minority group.

H70: SERVICE AND MAINTENANCE

The total complement in the Service/Maintenance job group is 157, which is an increase of 11 from last year. Female representation is at 31%, with availability of 22%, resulting in nounderutilization of women. Minority representation is at 55%, with availability of 37%, resulting in nounderutilization of minorities. There is also no underutilization of any specific minority group.

IX. DESIGNATION OF RESPONSIBILITY FOR IMPLEMENTATION

Responsibility for implementing the University's Equal Employment Opportunity Policy and Affirmative Action Plan rest with each member of management. The Vice President for Diversity, Equity, and Inclusion & Chief Diversity & Inclusion Officer, Office for Diversity, Equity & Inclusion, and Senior Associate Vice President & Chief Human Resources Officer are the University's officers charged with monitoring the overall equal employment opportunity and affirmative action responsibilities.

THE PRESIDENT: as the Chief Executive Officer of West Chester University, assumes overall responsibility for the implementation of the AAP.

OFFICE FOR DIVERSITY, EQUITY & INCLUSION (ODEI): The Vice President for Diversity, Equity, and Inclusion & Chief Diversity & Inclusion Officer reports to the President and has the day-to-day responsibility for the development, implementation, auditing, and monitoring of the AAP. This office has top management support and cooperation. Appropriate identification of this office appears on all internal and external communications concerning the University's AAP.

The responsibilities of this office include but are not limited to:

1. Develop the AAP and policy statements and communicate these programs and policy statements externally and internally;
2. Identify problem areas in the recruitment, hiring and retention policies, practices and processes;
3. Assist management in arriving at solutions to EEO/AA issues;
4. Design, implement, audit and monitor systems that:
 - a. Measure the effectiveness of the University's AAP;
 - b. Provide indications of need for remedial action;
 - c. Determine the degree to which the University's targets and objectives have been attained.
5. Serve as liaison between the University and enforcement agencies (i.e., EEOC, OFCCP, PHRC, etc.);
6. Serve as liaison between the University and minority organizations, women's organizations, and community action groups concerned with employment opportunities for underrepresented and protected class members;
7. Keep all levels of University administration informed of the latest developments in the equal opportunity area; and
8. Endorse the principles of affirmative action and cultural diversity in the workplace.

OFFICE OF INSTITUTIONAL RESEARCH: will be responsible for ensuring that appropriate statistical data is collected, maintained and analyzed with respect to personnel and student data and shared with the ODEI. The Office of Institutional Research will also assist in responding to State and Federal agencies request for statistical data.

OFFICE OF HUMAN RESOURCES: the responsibilities of Human Resources include but are not limited to:

1. Assist the ODEI in support of EEO/AA;
2. Ensure that appropriate statistical data is collected, maintained, analyzed, and shared with the ODEI with respect to such personnel transactions as hires, promotions, transfers, terminations, etc;
3. Support placement efforts for people with disabilities, veterans, and underrepresented members and maintain contact with minority organizations, women's organizations, community action groups, and community service programs to enhance recruitment of potential hiring of employees;
4. Assist the ODEI in meeting goals and objectives within the University AAP;
5. Assume responsibility for communicating EEO/AA goals and objectives to administrators, managers, supervisors, screening and search committees;

6. Conduct periodic audits of the University's personnel transactions, such as hiring, promotions, reclassifications, upgrades or terminations to ensure the attainment of established goals and objectives and ensure non-discrimination practices;
7. Conduct periodic review of qualifications of employees to ensure that underrepresented groups and women are given full consideration for promotions, upgrades and reclassifications;
8. Assist with the identification of underrepresented groups and women for possible employment consideration;
9. Recruit for the application of underrepresented groups and women employees for promotional and reclassification opportunities;
10. Conduct quarterly inspections to ensure that each work location is in compliance as follows:
 - a. EEO posters are properly displayed;
 - b. Underrepresented groups and women employees are afforded full opportunity and are encouraged to participate in University-sponsored training, wellness, and social activities; and
11. Endorse the principles of affirmative action and cultural diversity in the workplace.

VICE PRESIDENTS: are assigned responsibility for the administration and implementation of the AAP, which includes:

1. Implement and audit AAP goals;
2. Assist the ODEI and HR in developing and meeting the goals and objectives set forth by the AAP;
3. Provide assistance with reporting procedures related to documenting efforts required by West Chester University's AAP;
4. Assume responsibility for communicating AAP goals and objectives to their direct reports; and
5. Endorse the principles of affirmative action and cultural diversity in the workplace.

DEANS, DIRECTORS, AND DEPARTMENT HEADS: have responsibilities, which include but are not limited to:

1. Involvement with minority organizations, women's organizations, community action groups, and community service programs to enhance recruitment of potential employees;
2. Conduct periodic audits of their units' personnel transactions, such as hiring, promotions, reclassifications, upgrades or terminations to ensure the attainment of established goals and objectives and ensure non-discrimination practices;
3. Conduct reviews of employment qualifications to ensure that underrepresented groups and women are given full consideration for promotions, upgrades and reclassifications;
4. Conduct quarterly inspections to ensure that each work location is in compliance as follows:
 - a. EEO posters are properly displayed;
 - b. Underrepresented groups and women employees are afforded full opportunity and are encouraged to participate in University-sponsored training, wellness, and social activities.
5. Assist with monitoring AAP programs, which include at least the following:
 - a. Encourage and support goals and timetables for increasing the representation of minority and women employees;
 - b. Assessing prior year's AAP results; and
6. Endorse the principles of affirmative action and cultural diversity in the workplace.

LINE MANAGERS AND SUPERVISORS: have responsibility for lending their individual and collective support to the AAP by:

1. Assist with the identification of underrepresented groups and women for possible employment consideration;
2. Encourage the application of underrepresented groups and women employees for promotional and reclassification opportunities;
3. Endorse the principles of affirmative action and cultural diversity in the workplace.

X. IDENTIFICATION OF AREAS WITH ESTABLISHED GOALS

A. Identification of Potential Areas for Improvement.

In making an in-depth analysis of the University's total employment process, particular attention has been paid to those EEO-6 categories where underrepresented groups and women may face impediments to equal opportunity. The table below summarizes the goals that have been established for the program year. In general terms, the University has continued to make progress in placing underrepresented groups and women in various organizational units and job groups. At the present time, underrepresented groups and women are involved in many major departments and units at the University, and their progress into high-level jobs continues.

An analysis of the personnel practices and procedures of the University has revealed the following:

- The composition of the workforce in terms of the overall numbers of underrepresented groups and women continues to reflect the University's strong commitment to equal employment opportunity.
- The University periodically examines the workforce composition and to establish appropriate goals in order to improve the representation of minorities and women where impediments may exist.
- Goals are established when the population of women or minorities in a job group is significantly less than the determined availability. The University establishes appropriate goals in order to improve the representation of minorities and women where disparities exist.

B. Special Corrective Actions.

We have conducted this analysis in order to ensure that the University's commitment to EEO/AA is being fully implemented. Having completed such an analysis, the University has concluded the following:

- Where problem areas are identified in any job group, placement goals are developed, and goals have been established. 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. The University believes it is reasonable that no goal is necessary where underutilization is less than one whole person. The University will make good faith efforts in the future to expand employment opportunities, and produce measurable results dependent upon the business conditions and number of employment opportunities which may occur.
- 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 periodically reviewed and properly identify job-related requirements.
- Underrepresented groups and women are not excluded from any University-sponsored activities or programs, and such programs are fully integrated.
- The written AAP is fully communicated and supported at all levels of management.

- The Vice President for Diversity, Equity, and Inclusion & Chief Diversity & Inclusion Officer continues to provide periodic reports to management regarding the status of the AAP and the progress being made.
- EEO posters are prominently displayed in appropriate places at the University.

XI. DEVELOPMENT AND EXECUTION OF ACTION-ORIENTED PROGRAMS AND SERVICES

The following action-oriented programs or procedures designed to further the University's commitment to equal employment opportunity are continuing:

- A. Job qualifications are reviewed during each search to ensure that they do not screen out minorities and women and that they are job-related.
- B. The ODEI and HR continue 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 the University's policy of nondiscrimination. There is no department or job group in the University that is limited 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 University analyzes all selection techniques and employment standards periodically and, where they are found to create a potential impediment for underrepresented groups or women, they are appropriately revised.
- C. The ODEI, HR, and search committees use the following techniques to maintain a satisfactory flow of qualified underrepresented and women applicants:
 1. Advertise online and in national print media to encourage the recruitment of underrepresented and women employees;
- D. HR will periodically review the promotion procedures to ensure that promotional decisions are made without regard to race, color, sex, sexual orientation, gender identity, age, religion, disability, military status, gender, or national origin. In an effort to maintain acceptable promotion rates for qualified minorities and women, the University utilizes the following procedures:
 1. Provide job training, including such assistance as tuition reimbursement and/or Out-Service Training;
 2. Provide employee evaluation programs; and
 3. Require promotional decisions to be justified on a nondiscriminatory basis.
- E. The University continually makes certain that its facilities and University-sponsored social and recreational activities encourage all employees to participate in any such University-sponsored events.

XII. INTERNAL AUDIT AND REPORTING SYSTEMS

The University believes that one of the most important elements in effectively implementing a written AAP 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, the University has established the following internal audit and reporting system:

1. Monitor personnel activity to ensure nondiscrimination.
2. Progress toward meeting goals is monitored periodically. Results of the monitoring analyses are communicated to management, if necessary.
3. Annually, the Vice President for Diversity, Equity, and Inclusion & Chief Diversity & Inclusion Officer meets with senior management and makes recommendations to improve AAP results.

XIII. PROHIBITION OF SEX DISCRIMINATION

West Chester University complies with all prohibitions against discrimination on the basis of sex. The University's compliance is achieved through the following:

It is West Chester University's policy to not discriminate on the basis of gender in any term or condition of employment, benefits, training, promotional opportunities, tenure, or wages and hours:

- The University expressly prohibits gender discrimination in all phases of employment. There are no positions where gender is a bona fide occupational qualification.
 - Applicants and employees of both sexes are recruited for all positions.
 - The University makes no distinction based upon gender with regard to employment opportunities, wages, hours, or other terms and conditions of employment.
 - All employment practices are applied equally to members of either gender, and there is no distinction between men and women in terms of employee benefits or retirement age for any job.
 - The University makes no distinction between married and unmarried persons.
 - The University does not deny employment to women or men with young children.
 - The University complies with the Age Discrimination in Employment Act and does not terminate employees of either sex when they reach a certain age.
 - The University provides appropriate physical facilities for both sexes.
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