

AFFIRMATIVE ACTION PLAN FOR MINORITIES & WOMEN

Oklahoma State University-Oklahoma City

OSU-OKC

November 1, 2019 through October 31, 2020

Table of Contents

Preface

Introduction

Equal Employment Opportunity and Affirmative Action Statement of Policy

Religious and National Origin Discrimination Policy

Responsibility for Implementation

Organizational Profile

Job Group Analysis

Availability Analysis

Comparison of Incumbency vs. Estimated Availability

Placement Goals

Identification of Problem Areas by Organizational Unit and Job Group

Development and Implementation of Action Oriented Programs

Internal Audit and Reporting System

Conclusion

List of Exhibits

Preface

Oklahoma State University-Oklahoma City (also referred to as the University) is fully committed to the concept and practice of equal opportunity and affirmative action.

In the preparation of this AAP, Oklahoma State University-Oklahoma City has been guided by E.O. 11246 and its implementing regulations. 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 any federal, state or local employment practice laws.

In developing and implementing the AAP, the University has been guided by its established policy of providing equal employment opportunity. Nothing herein is intended to sanction the discriminatory treatment of any person. Indeed, all employment decisions at the University are made based on job related criteria. Thus, this AAP has been developed in strict reliance upon the Guidelines on Affirmative Action issued by the Equal Employment Opportunity Commission ("EEOC") (29 C.F.R. Part 1608).

While Oklahoma State University-Oklahoma City firmly believes in wide dissemination of its affirmative action policies and equal employment opportunity practices, this AAP contains certain proprietary information relating to the University's business that must be kept confidential. The detailed information provided in good faith as a part of the AAP contains specific information that, if disseminated, could be detrimental to the competitive and business interests of Oklahoma State University-Oklahoma City.

Therefore, even though the University is justifiably proud of its efforts described in the following pages, this AAP and its support data are to be disclosed to individuals, companies and government agencies only where such individuals or entities have a legitimate business interest or legal entitlement to the information. Oklahoma State University-Oklahoma City specifically requests the following:

- If this AAP or any supporting data or documentation is submitted to Office of Federal Contract Compliance Programs ("OFCCP") pursuant to the Executive Order, the Rehabilitation Act, the Vietnam Era Veterans' Readjustment Assistance Act, and/or any implementing regulations (as any or all may have been or may be amended), those documents and the information they contain are to be considered confidential and not subject to disclosure without notifying Oklahoma State University-Oklahoma City of the agency's decision to disclose and providing the University with ample time to contest the disclosure. Advance notice of disclosure should be sent to Mrs. Melissa Herren. The University requests this information be treated as exempt from public disclosure under the Freedom of Information Act, 5 U.S.C. §552.
- If this AAP or any supporting data or documentation is supplied by University to another government contractor, EEOC or fair employment practices agency representatives, or any other person, it is not to be copied, reproduced, or disclosed by such persons without prior notification to Oklahoma State University-Oklahoma City.
- No information contained in the AAP or any supporting data or documentation is to be copied, removed from the premises, or released to other individuals without a prior notification to and permission from Oklahoma State University-Oklahoma City.
- Reports that require specific data, such as names of employees and salary information, are not an official part of this AAP. This information is on file at the University as Documentation and Supporting Data for AAP Reports and is available for review only as required by law.

This AAP does not constitute an express or implied contract between the University and its employees, job applicants, or other persons, nor does it change in any way the basic at will employment relationship all University employees have with the University. Nothing in this AAP creates a private right of action on behalf of any individual group against the University.

Introduction

Ever committed to affirmative action, Oklahoma State University-Oklahoma City has prepared this AAP to cover employees reporting to and/or working in OSU-OKC. This plan also covers employees working in other establishments who report to managers included in this plan.

As detailed in the Job Group Analysis, this AAP covers 467 employees including 102 (21.84%) minorities and 265 (56.75%) women. It is expected these employees will help us to reach mutual goals of profitability and efficiency, resulting in both business and personal growth. As described in detail in the Plan that follows, the management of Oklahoma State University-Oklahoma City has a continuing commitment to the practice and implemented action of this AAP.

Equal Employment Opportunity and Affirmative Action Statement of Policy

It is the policy of Oklahoma State University-Oklahoma City not to discriminate or allow the harassment of employees or applicants on the basis of sex, gender identity, sexual orientation, race, color, religious creed, national origin, physical or mental disability, protected veteran status, or any other characteristic protected by law with regard to any employment practices, including recruitment, advertising, job application procedures, hiring, upgrading, training, promotion, transfer, compensation, job assignments, benefits, and/or other terms, conditions, or privileges of employment, provided the individual is qualified, with or without reasonable accommodations, to perform the essential functions of the job. This policy applies to all jobs at the University. The University will continue to ensure that individuals are employed, and that employees are treated during employment, without regard to their sex, gender identity, sexual orientation, race, color, religious creed, national origin, physical or mental disability, protected veteran status, or any other characteristic protected by law in all employment practices as follows:

Employment decisions at the University are based on legitimate job related criteria. All personnel actions or programs that affect qualified individuals, such as employment, upgrading, demotion, transfer, recruitment, advertising, termination, rate of pay or other forms of compensation, and selection for training, are made without discrimination because of any basis protected by law. Employees may choose to voluntarily disclose their sex, race, national origin, disability and protected veteran status at any time by contacting Human Resources. Such information will be maintained in a confidential manner and will not be used against an individual when making any employment decisions. Employees and applicants with disabilities and disabled veterans are encouraged to inform Human Resources if they need a reasonable accommodation to perform a job for which they are otherwise qualified. The University makes, and will continue to make, reasonable accommodations to the known physical or mental limitations of an otherwise qualified applicant or employee to promote the employment of qualified individuals with disabilities and disabled veterans, unless such accommodations would impose an undue hardship on the operations of the University's business.

Oklahoma State University-Oklahoma City, and our President are fully committed to principals of equal employment opportunity and affirmative action. As Assistant VP/Administration & Finance, Human Resources, I support the successful implementation of the University's Affirmative Action Programs. I have appointed Mrs. Melissa Herren, Affirmative Action Officer for the University, with responsibility for implementation of the University's affirmative action activities. The Affirmative Action Officer has the full support of top management and the staff necessary to fully implement this Program. All managers and supervisors will take an active part in the University's AAP to ensure all qualified employees and prospective employees are considered and treated in a nondiscriminatory manner with respect to all employment decisions. Furthermore, Oklahoma State University-Oklahoma City will solicit the cooperation and support of all employees for the University's Equal Employment Opportunity and Affirmative Action Policy.

Our Affirmative Action Programs include an audit and reporting system, which, among other things, uses metrics and other information to measure the effectiveness of our Programs. The Affirmative Action Officer has been assigned responsibility for periodically reviewing progress in the compliance and implementation of the policy of affirmative action. In accordance with public law, the University's program of affirmative action for qualified individuals with disabilities and the program of affirmative action for protected veterans are available for inspection in the Human Resources Department, Monday through Friday, from 9:00 a.m. to 5:00 p.m. upon request.

In addition, employees and applicants will not be subjected to harassment, intimidation, threats, coercion, or discrimination because they have engaged in, or may have engaged in, filing a complaint, assisting or participating in an investigation, compliance review or hearing, or other activity related to the administration of Section 503 of the Rehabilitation Act of 1973, the Vietnam Era Veterans' Readjustment Assistance Act of 1974, Executive Order 11246, all as amended, and/or any other federal, state, or local law or regulation regarding Equal Employment Opportunity, opposing any act or practice made unlawful, or exercising any other right protected by such laws or regulations. Oklahoma State University-Oklahoma City will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with the contractor's legal duty to furnish information.

Christa Louthan
Assistant VP/Administration & Finance, Human Resources

Religious and National Origin Discrimination Policy

41 C.F.R. 60-50.1 – 60.50.5

Pursuant to the University's equal employment opportunity and affirmative action policy, we have adopted the following policy prohibiting religious and national discrimination and harassment in the workplace. This policy applies to all terms and conditions of employment, including but not limited to, recruitment, hiring, promotion, transfer, demotion, layoff or recall from layoff, termination, wage and benefit administration, and selection for training or other employment opportunities. In furtherance of our commitment to ensuring equal employment opportunity regardless of national origin or religious beliefs, we will take the following steps, as appropriate:

- Recruit individuals for all positions without regard to their national origin or religious beliefs
- Review employment practices and personnel policies to ensure that applicants and employees are not discriminated against or harassed on the basis of religion or national origin
- Provide qualified employees with an equal opportunity to any available job without regard to their religion or national origin
- Administer employment opportunities, wages, hours, conditions of employment, retirement programs, and other employee benefits regardless of religion or national origin
- Develop written policies which prohibit unwelcome verbal or physical conduct based on religion or national origin and take reasonable steps to prevent such harassment occurring
- Explain the University's commitment to equal employment opportunity to supervisors and employees and request their support
- Develop reasonable internal procedures to monitor our implementation of the University's equal employment opportunity and affirmative action policy
- Inform all recruitment sources of the University's commitment to equal employment opportunity and seek their assistance and support of Oklahoma State University-Oklahoma City's commitment to providing equal employment opportunity without regard to national origin or religion
- Endeavor to make reasonable accommodations to religious observations and practices of an employee or prospective employee unless doing so would pose an undue hardship on the University's business.

Responsibility for Implementation

41 C.F.R. 60-2.17

Christa Louthan, Assistant VP/Administration & Finance, Human Resources, has overall responsibility for implementation of the Equal Employment Opportunity Policy and the AAP. The University has assigned primary management responsibility and accountability for ensuring full compliance with the Program to Mrs. Melissa Herren, the Affirmative Action Officer of the University. As Affirmative Action Officer, Mrs. Melissa Herren has the authority, resources, support of and access to top management necessary to ensure the effective implementation of the AAP. The Assistant VP/Administration & Finance, Human Resources actively supports the program and provides assistance whenever it is needed, making managers and supervisors aware of the program and requesting their cooperation and assistance. The name of the Affirmative Action Officer appears on internal and external communications on the University's Equal Employment Opportunity Policy and AAP.

With regard to the OSU-OKC AAP, Christa Louthan works closely with Mrs. Melissa Herren to implement the programs which are specific to the University. Mrs. Melissa Herren, together with the Human Resources staff, has primary responsibility for implementing programs at the University.

The duties of the Affirmative Action Officer and designees include:

- Developing policy statements, AAPs, and internal and external modes of communication
- Overseeing regular discussions with local managers, supervisors, and employees to ensure the University's policies are being followed
- Training personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes to ensure the commitments in the University's affirmative action program are implemented
- Advising supervisors that the University is obligated to prevent discrimination and harassment of employees
- Identifying, in conjunction with line management any problem areas in implementing the AAP, and developing solutions
- Identifying any barriers to employment for protected individuals and assisting managers in developing solutions to ensure that all individuals benefit from equal employment opportunities
- Designing and implementing an internal audit and reporting system that will measure the effectiveness of the University's Program, indicate the need for remedial action, determine the degree to which the University's objectives have been attained, determine whether all employees have had the opportunity to participate in University-sponsored educational, training, recreational, and social activities, and ensure each University location is in compliance with applicable laws and regulations
- Serving as liaison between the University and enforcement agencies, and between the University and organizations of and for minorities or women
- Encouraging active involvement by University representatives in the community service programs of local organizations of and for minorities and women

- Ensuring posters and notices are properly displayed or disseminated in ways that are accessible and understandable to applicants and employees
- Keeping management informed of the latest developments in affirmative action.

The University recognizes the cooperation of department supervisors and line managers is required to reach the full potential of this AAP. Therefore, supervisors and managers are expected to:

- Assist the Affirmative Action Officer in the identification of any problem areas and help eliminate any barriers to equal employment opportunity
- Whenever possible, become involved in local minority organizations, women's organizations, community action groups, and community service programs
- Work with the Affirmative Action Officer to periodically review hiring and promotion patterns and training programs to isolate impediments to the attainment of affirmative action placement goals and objectives. Results from these reviews are communicated through appropriate management meetings
- Review the qualifications of applicants and employees in a nondiscriminatory manner with regard to hire, promotion, transfer and termination
- Provide career counseling for employees as needed
- Adhere to the University's policy of equal employment opportunity for all employees and ensure the policy is understood, supported, and adhered to by the employees they supervise
- Take action to prevent the discrimination and harassment of employees based on protected characteristics or due to a perception that an individual might have been the beneficiary of the University's affirmative action efforts.

Organizational Profile

41 C.F.R. 60-2.11

As one of the diagnostic components of Oklahoma State University-Oklahoma City's AAP, and to conform to applicable regulations, the University has completed a profile of the workforce at the OSU-OKC establishment. The organizational profile is an overview of the staffing patterns at this establishment, and is used to determine whether there are areas in the workforce where individuals are underrepresented or concentrated by gender or race. To complete our organizational profile we have elected to follow the Workforce Analysis methodology.

The following charts set forth our Workforce Analysis. The analysis identifies the departments at the OSU-OKC establishment and for each department lists all job titles from lowest to highest paid. For each job title, we provide the following data: the total number of incumbents, the total number of male and female incumbents, and the total number of male and female incumbents by racial/ethnic group.

Job Group Analysis

41 C.F.R. 60-2.12

As the second diagnostic component of our AAP we have conducted a job group analysis. The job group analysis is the first step in comparing the representation of minorities and women in the workforce covered by this AAP with the estimate of the available qualified minorities and women who could be employed by Oklahoma State University-Oklahoma City in positions covered by this AAP.

In designing our job groups we considered similarities of duties and opportunities.

Although not a determinative factor in designing job groups, we also attempted to create job groups large enough to conduct appropriate analysis.

The following charts identify the job groups created for this AAP, the job titles that comprise each job group, and the percentage of minority incumbents and the percentage of female incumbents in each job group.

Job Group Analysis

7E

FACILITIES SUPP STAFF

EEO Code: 7

Job Code & Title		Min	Fem							
GREENHOUSE TECH - GREENHOUSE TECH	#	0	1							
1 Employee	%	0.00	100.00							
1 Employee	Totals	0	1							
	%	0.00	100.00							

color, religious creed, national origin, physical or mental disability, protected veteran status, or any other characteristic protected by law.

- Placement goals do not create set-asides for specific groups, nor are they intended to achieve proportional representation or equal results.
- Placement goals are not used to supersede merit selection principles, nor do these placement goals require the University to hire a person who lacks qualifications to perform the job successfully or hire a less qualified person in preference to a more qualified one.

A review of progress and goal attainment by job group for the period from November 01, 2018 to October 31, 2019 reveals the following:

Placement Goals

41 C.F.R. 60-2.16

As required by applicable regulations, Oklahoma State University-Oklahoma City has established placement goals where the actual representation of women or minorities in a job group is less than would be reasonably expected based on calculated availability.

In establishing placement goals, we applied the following principles:

- When the percentage of minorities or women employed in a particular job group is less than would reasonably be expected, given their availability percentage in that job group, the University established a percentage annual placement goal at least equal to the availability figure derived for women or minorities, as appropriate, for that job group.
- Placement goals are not quotas that must be met, nor are they to be considered as either a ceiling or a floor for the employment of particular groups.
- In all employment decisions, the University makes selections in a nondiscriminatory manner. Placement goals do not provide a justification to extend a preference to any individual, select an individual, or adversely affect an individual's employment status, on the basis of that individual's sex, gender identity, sexual orientation, race, color, religious creed, national origin, physical or mental disability, protected veteran status, or other characteristic protected by law.
- Placement goals do not create set-asides for specific groups, nor are they intended to achieve proportional representation or equal results.
- Placement goals are not used to supersede merit selection principles, nor do these placement goals require the University to hire a person who lacks qualifications to perform the job successfully or hire a less qualified person in preference to a more qualified one.

As is described in more detail in the Action Oriented Program section of this AAP, where a placement goal is set, the University will develop action oriented steps to increase the recruitment and training of minorities or women, or both.

Oklahoma State University-Oklahoma City

November 1, 2019 Annual Affirmative Action Plan

OSU-OKC

Placement Goals

Job Group & Name	Min	Fem								
2F5 - Adj.-Instructor	26.84									

Identification of Problem Areas by Organizational Unit and Job Group

41 C.F.R. 60-2.17(b)

We have conducted analyses of our total employment process, including evaluating the workforce by organizational unit and job group, personnel activity, compensation systems, and other personnel procedures to determine whether and where impediments to equal employment opportunity exist.

An analysis of each of these processes follows.

Composition of the Workforce by Organizational Unit

Of the 65 departments in this AAP, 41 or 63.08% include minorities, and 57 or 87.69% include females. Our analysis by organizational unit reveals that minorities and women are not significantly underrepresented or concentrated in any particular organizational unit. This analysis suggests that there is no policy or practice excluding minorities or women from any departments, nor is there any racial or sexual discrimination in the selection process.

Composition of the Workforce by Job Group

Pursuant to OFCCP regulations, we have conducted an availability analysis by job group, taking into account both external and internal availability, and have compared incumbency to estimated availability to determine placement goals. The descriptions of Factor 1 and Factor 2 by job group are summarized in the Availability Analysis. Our findings are as follows:

- Our analysis indicates that, for minorities, incumbency is less than availability by a statistically significant amount in job group 2F5.
- Our analysis of incumbency vs. estimated availability indicates that in some cases, incumbency is less than estimated availability, however, our more detailed analysis concludes that there is no significant problem concerning female utilization.
- The University has established affirmative action placement goals and programs to address any areas of underutilization, and will continue to make a good faith effort to reach the placement goals established by implementing action oriented programs, which are detailed elsewhere in this AAP.

Analysis of Progress Towards Prior Year Goals

In establishing placement goals, the following principles apply:

- When the percentage of minorities or women employed in a particular job group is less than would reasonably be expected given their availability percentage in that job group, the University has established an annual percentage placement goal at least equal to the availability figure derived for women or minorities, as appropriate, for that job group.
- Placement goals are not quotas that must be met, nor are they to be considered as either a ceiling or a floor for the employment of particular groups.
- In all employment decisions, the University makes selections in a nondiscriminatory manner. Placement goals do not provide a justification to extend a preference to any individual, select an individual, or adversely affect an individual's employment status, on the basis of that individual's sex, gender identity, sexual orientation, race,

color, religious creed, national origin, physical or mental disability, protected veteran status, or any other characteristic protected by law.

- Placement goals do not create set-asides for specific groups, nor are they intended to achieve proportional representation or equal results.
- Placement goals are not used to supersede merit selection principles, nor do these placement goals require the University to hire a person who lacks qualifications to perform the job successfully or hire a less qualified person in preference to a more qualified one.

A review of progress and goal attainment by job group for the period from November 01, 2018 to October 31, 2019 reveals the following:

Oklahoma State University-Oklahoma City

November 1, 2019 Annual Affirmative Action Plan

OSU-OKC

Goal Attainment

2F5	Adj.-Instructor		
	Total	Min	Fem
Prior Year Goal		26.84	
New Hire	46	7	15.22
Promotion	0	0	N/A
Total Opps	46	7	15.22
Achieved? *		NO	

Note - there was no prior year goal required for categories not listed above.

* YES = within one person of exceeding prior year goal

LIMITED = Limited Opportunities. This indicates the prior year goal percent multiplied by total opportunities to the job group was less than one person.

Hires

The Human Resources Department develops all procedures and all hiring at the University is conducted on the basis of nondiscriminatory criteria. Specifically, the following criteria and procedures have resulted in hiring decisions that are free of discrimination:

- o Job descriptions have been reviewed and revised to make sure duties are accurately described, that the experience and education requirements are job related, and that all incumbents meet minimum job requirements. Job titles have and will continue to be written without regard to sex, gender identity, sexual orientation, race, color, religious creed, national origin, physical or mental disability, protected veteran status, or any other characteristic protected by law.
- o Application forms have been reviewed to ensure all requested information is job related, and the forms comply with all applicable laws. In addition, all forms state the University is an Equal Opportunity/Affirmative Action Employer.
- o Oklahoma State University-Oklahoma City representatives who are involved in the selection process have been briefed on the University's obligations.
- o Where applicable, tests have been reviewed and are administered and conducted in a non-discriminatory manner.
- o All employees are encouraged to refer qualified applicants to the University for employment. In addition, the University has formal recruitment procedures to apprise minority and women's groups, educational institutions, and other referral sources of openings.
- o Placing an applicant in a specific job in a department is the responsibility of management. Hiring decisions are based on the applicants knowledge, skills, abilities, and any other job related criteria.

A review of external hires for the prior plan year indicates that selection decisions were made in a non-discriminatory manner. There were 124 new employees hired during the period from November 01, 2018 to October 31, 2019 including 31 minorities at 25% and 66 women at 53%.

The following report summarizes hiring activity by job group:

Promotion Practices

A review of promotion data indicates these selection decisions are being made in a non-discriminatory manner. To ensure that such decisions are being made in a non-discriminatory manner, the following equal employment opportunity practices are in place:

- o The University provides every reasonable opportunity for employees to advance. In this regard, training and other developmental opportunities are offered.
- o Employees are encouraged to contact their supervisor and/or the Human Resources Department, at any time, should they desire information relative to another position within the University.
- o Management initiated promotions are based on performance and other job related criteria without discrimination on account of sex, gender identity, sexual orientation, race, color, religious creed, national origin, physical or mental disability, protected veteran status, or any other characteristic protected by law
- o Most promotional opportunities are posted, providing all interested employees with an opportunity to apply and call their special skills to the attention of the manager.
- o The University's career development program enables all employees to designate career paths and positions for which they wish to be considered.

Compensation Systems

As part of its affirmative action obligations, the University has reviewed its compensation systems to determine whether those systems are being administered without regard to an individual's sex, race, ethnicity, or other characteristic protected by law. Our analysis did not identify any significant problem areas. If the University discovers significant compensation system differences between individuals who are similarly situated, it will determine whether they are the result of legitimate, nondiscriminatory factors.

Terminations

The University has evaluated its termination practices to determine whether there are disparities on the basis of sex, race or ethnicity. When terminations or reductions in force are necessary, the University makes its decisions without regard to sex, gender identity, sexual orientation, race, color, religious creed, national origin, physical or mental disability, protected veteran status, or any other characteristic protected by law.

A report summarizing terminations by job group follows:

Outreach Recruitment and Other Good Faith Efforts

Oklahoma State University-Oklahoma City has reviewed its employment practices to determine whether its personnel programs are designed to effectively recruit and advance in employment protected individuals. While the University believes there are no deficiencies in its current employment practices with respect to applicants and employees who are protected individuals, it engages in outreach, positive recruitment, and internal and external dissemination programs to augment its existing affirmative efforts. The University engages in or has made plans to implement the following activities:

- Written notification of University's affirmative action policy is sent to all subcontractors, including subcontracting vendors and suppliers, and requests appropriate action on their part. Oklahoma State University-Oklahoma City makes the Equal Employment Opportunity Clause part of all covered contracts and purchase orders, and requires all qualified contractors and subcontractors to develop and maintain a written AAP.
- Oklahoma State University-Oklahoma City advertisements or solicitations for prospective employees indicate that Oklahoma State University-Oklahoma City is an equal opportunity employer.
- The University will inform recruiting sources of Oklahoma State University-Oklahoma City's policy of affirmative action for protected individuals. Recruiting sources will be requested to actively recruit and refer qualified protected individuals for all positions.
- Oklahoma State University-Oklahoma City will identify local organizations and/or community agencies known to specialize placing and/or developing training programs for protected individuals and send them notices of vacant positions. When appropriate, the University will invite community service and other outreach partners to tour the office and discuss the University, job recruitment needs, selection process, and other details related to recruitment and placement. In the event a partner is unable to schedule an on-site meeting, the University will suggest a telephone meeting so they can better identify qualified individuals for our positions.
- When the University recruits at colleges and universities, it will incorporate efforts to reach students who are covered by this AAP.
- The University includes a copy of its Equal Employment Opportunity and Affirmative Action Policy Statement in its Policy Manual. When applicable, Oklahoma State University-Oklahoma City publicizes the policy in University publications. The policy is discussed in both new employee orientation and management training programs.
- Oklahoma State University-Oklahoma City's policy on equal employment opportunity and affirmative action is posted on University bulletin boards. The posting includes a statement that employees and applicants are protected from coercion, intimidation, and interference or discrimination for filing a complaint or assisting in an investigation under Executive Order 11246, as amended. The University also posts a copy of the policy in electronic format in a conspicuous location on the University intranet, along with other employment forms, and

otherwise ensures all off-site personnel have a copy of or the ability to view the policy

- The University's employment application and electronic application processes include information about the Oklahoma State University-Oklahoma City's commitment to equal employment opportunity and affirmative action.
- All other required affirmative action notices and policy statements are posted on University bulletin boards and are updated annually.
- Executives, management officials, supervisors, and other employees of the University are encouraged to assist in the effort to disseminate Oklahoma State University-Oklahoma City's policy of affirmative action to appropriate individuals outside of the University. Meetings with executive management and supervisory personnel will be conducted at least annually to explain the University's policy of affirmative action, to make clear the Assistant VP/Administration & Finance, Human Resources's support for the policy, and to impart to these personnel their responsibility in making the AAP a success.
- Oklahoma State University-Oklahoma City will seek to include individuals covered by this AAP when employees are pictured in consumer and personnel recruitment advertising.
- The University will communicate to employees its obligation to take affirmative action to employ protected individuals and will encourage employee referral of covered applicants.
- An invitation to participate in Oklahoma State University-Oklahoma City's policy of affirmative action is disseminated to all applicants, as well as to all employees once the University has extended a job offer, but before beginning employment duties.
- All personnel and employment records made or kept by the University are retained for the required period as mandated by OFCCP regulations.

Development and Implementation of Action Oriented Programs

41 C.F.R. 60-2.17

The University has developed and executed action oriented programs designed to correct any problem areas that may exist. These programs, which are listed below, demonstrate our good faith efforts to remove identified barriers, expand employment opportunities, and produce measurable results.

The University has analyzed and will continue to analyze all positions and prepare written descriptions to accurately reflect position functions. Due to the use of a position description format, they are and will continue to be consistent for the same position from one organizational unit to another.

Job descriptions have been and will continue to be reviewed to determine the knowledge, skills, abilities, and other requirements necessary for the adequate performance of every job. Specifications will continue to be consistent for the same job title in all organizational units and will not contain any requirements that would result in discrimination on the basis of sex, gender, sexual orientation, race, color, religious creed, national origin, physical or mental disability, protected veteran status, or any other characteristic protected by law.

Job descriptions are available to incumbents and all members of management involved in the recruiting, screening, selection, and promotion process. Job descriptions are also made available to employees, applicants, and recruiting sources as appropriate.

The University has carefully evaluated the total selection process and found it to be free from discrimination.

- We have instructed all supervisory personnel to ensure elimination of discrimination in all personnel actions in which they are involved.
- Any tests administered by the University are job related and given to all applicants for applicable positions.
- Application forms do not contain questions with potential discriminatory effects.
- The University does not and will not use any selection techniques that can be improperly used to discriminate against minority groups or women.

The University has evaluated its techniques for improving recruitment and increasing the flow of qualified minority or female applicants through the following:

- Minority and women, as well as non-minority and male, employees are actively encouraged to refer applicants to our organization.
- The University relies on the State Department of Employment as well as job fairs and recruiting programs sponsored by local community colleges and other community organizations.
- The University provides an orientation program to inform new employees of their equal employment responsibilities, promotional opportunities, University rules, ways to alleviate any problems that might arise, and any other issues related to affirmative action compliance.
- Local organizations will be contacted for referrals of potential minority and female employees.

- The University utilizes the Internet to identify targeted recruitment sites for qualified minority and female applicants.
- Furthermore, we plan to take the following additional steps to ensure adequate representation of all minorities and women:
 - Where placement goals exist as defined by the OFCCP, we will continue to contact universities and two- and four-year local colleges, vocational technical schools, high schools, local business schools, and state and community organizations which attract qualified minority and female students. We will advise these institutions of our desire to fill job openings in these classifications with minority and female employees. When possible, we will continue to participate in job fair and career day activities and we will consider relevant work experience programs.
 - We will continue to contact our normal sources of recruitment (e.g., State Employment) and advise them that under the AAP we are specifically seeking to employ minorities and/or women for job openings. During the period from November 01, 2018 to October 31, 2019, targeted recruitment activities were conducted.

The University has implemented the following programs and procedures to guarantee minority and female employees are given equal opportunities for promotion:

- On-the-job training is provided to all qualified employees to assist them in developing the necessary knowledge and skills for promotion to higher level jobs. In addition, a tuition reimbursement benefit is also available to all qualified employees.
- The University utilizes a formal performance evaluation program for all employees. In addition, management and supervisors are trained on the basic methodology of performance evaluation.
- Neither minority nor female employees are required to possess higher qualifications than those of the lowest qualified incumbent in the job for which they apply.
- Seniority practices are not a problem since the University has no formal seniority system. Promotions are based on merit selection principles.
- We will continue to make opportunities for advancement into more stimulating positions widely known through our career development process and by encouraging minorities and women to take advantage of these opportunities.
- Special internal training programs are provided as necessary to ensure the achievement of our placement goals. Programs are offered to eligible employees without regard to sex, gender identity, sexual orientation, race, color, religious creed, national origin, physical or mental disability, protected veteran status, or any other characteristic protected by applicable law.
- We will continue to participate in targeted external training programs.

Internal Audit and Reporting System

41 C.F.R. 60-2.17

It is the responsibility of the University's Affirmative Action Officer to monitor employment and personnel practices to ensure compliance with applicable regulations and adherence to the University's Affirmative Action Policy, and to measure the effectiveness of Oklahoma State University-Oklahoma City's AAP.

The University's audit and reporting system is designed and implemented to:

- Measure the effectiveness of the AAP
- Identify any need for remedial action
- Determine the degree to which the University's objectives are being attained
- Determine whether protected individuals have had the full opportunity to equal employment and to participate in all University sponsored educational, training, recreational, and social activities
- Measure the University's compliance with the AAP's specific obligations
- Document the actions taken to monitor the University's compliance with the AAP's specific obligations.

In order to measure the effectiveness of the AAP, University may take the following actions:

- Audits its voluntary self-identification process to monitor the number of individuals who choose to self-identify and evaluates whether changes could be made to University's self-identification process to encourage greater voluntary self-identification
- Monitors records of applicant flow, referrals, placements, rejected offers, training, transfers, promotions, terminations, and any layoffs or recalls to evaluate the degree to which equal employment opportunity and organizational objectives are being obtained
- Reports on the organization's progress towards equal employment opportunity, and any identified problem areas, to top management and those involved in the selection process, so that immediate and appropriate steps can be taken to resolve any issues
- Examines available utilization and benchmark data regarding protected individuals and develops action-oriented programs to address any areas of underutilization
- Reviews available data computations and analyses regarding applicants and hires
- Reviews the effectiveness of its recruitment and outreach activities
- Audits its communications with vendors and subcontractors to ensure that such communications reflect the University's commitment to equal employment opportunity and affirmative action
- Audits its communications with applicants and employees to ensure that such communications reflect the University's commitment to equal employment opportunity and affirmative action
- Audits its job listings to ensure that the postings reflect the University's commitment to equal employment opportunity and affirmative action, and that such postings are timely

listed with the appropriate state employment delivery system

- Audits its personnel policies to ensure that such policies reflect the University's commitment to equal employment opportunity and affirmative action
- Audits its personnel processes to ensure that individuals have equal opportunity in employment without regard to sex, gender identity, sexual orientation, race, color, religious creed, national origin, physical or mental disability, protected veteran status, or any other characteristic protected by law
- Audits any mental and physical qualifications to ensure that they are job-related and consistent with business necessity

Where the affirmative action program is found to be deficient, University shall endeavor to undertake necessary action to bring the program into compliance.

Conclusion

The AAP year, November 1, 2019 through October 31, 2020, shows a continued commitment to equal employment opportunity and affirmative action, and has strong plans to ensure both corporate and employee success.

Through its Affirmative Action Officer, Mrs. Melissa Herren, the University will continue to communicate its policies, both within the organization and to the community in which it works. The Assistant VP/Administration & Finance, Human Resources affords the Affirmative Action Officer full authority to take action to implement the plan and to pursue solutions to problems that might impede the progress of this plan.

At the close of Oklahoma State University-Oklahoma City's most recent plan year, an analysis of the composition of the workforce was undertaken. The workforce was analyzed by job group and by department to determine the employment of minorities and women, and to identify if placement goals are indicated when compared to the appropriate available workforce. This analysis revealed one area in which the difference between incumbency vs. estimated availability was statistically significant, showing that for the overwhelming majority of the workforce, employment levels of women and minorities are representative of our recruiting population. Nonetheless, the University expects to continue its successful outreach efforts and to ensure all applicants and employees are treated fairly, based on job related criteria and without regard to sex, gender identity, sexual orientation, race, color, religious creed, national origin, physical or mental disability, protected veteran status, or any other characteristic protected by applicable law.

The University is mindful of the fact that continued achievements in the area of equal employment opportunity and affirmative action are important. As a result, we have included additional action oriented plans and programs for recruiting, communication, and reporting, to ensure that our compliance with affirmative action continues in good stead.

Finally, it should be noted the University's thorough analysis of its workforce reveals that Oklahoma State University-Oklahoma City is in full compliance with sex discrimination guidelines and that there is no evidence of discrimination in any form against female employees. As outlined in this AAP, Oklahoma State University-Oklahoma City is ready and willing to make affirmative action both a commitment and a continued reality.

List of Exhibits

Exhibit A - Policy of Affirmative Action Letter

Exhibit B - Annual Notification to Vendors

Exhibit A - Policy of Affirmative Action Letter

Policy of Affirmative Action Letter for Recruitment & Referral Sources and Union Partners

Dear Outreach and Placement Professional:

This letter is to inform you that Oklahoma State University-Oklahoma City is committed to the principles of equal employment opportunity. As a government contractor bound by Executive Order 11246; the Vietnam Era Veterans Readjustment Assistance Act of 1974; and Section 503 of the Rehabilitation Act of 1973, all as amended, Oklahoma State University-Oklahoma City maintains an affirmative action plan through which it makes good faith efforts to recruit, hire and advance in employment qualified individuals without regard to sex, gender identity, sexual orientation, race, color, religious creed, national origin, physical or mental disability, protected veteran status, or any other characteristic protected by applicable law.

Oklahoma State University-Oklahoma City states as its Policy of Affirmative Action the following:

- It will be the policy of Oklahoma State University-Oklahoma City to recruit, hire, train, and promote persons in all job titles without regard to sex, gender identity, sexual orientation, race, color, religious creed, national origin, physical or mental disability, protected veteran status, or any other characteristic protected by law.
- All employment decisions shall be consistent with the principle of equal employment opportunity, and only job related qualifications will be required.
- All terms and conditions of employment will be administered without regard to an individual's sex, gender identity, sexual orientation, race, color, religious creed, national origin, physical or mental disability, protected veteran status, or any other characteristic protected by applicable law.

We would appreciate your assistance in Oklahoma State University-Oklahoma City's efforts to meet our equal employment and affirmative action goals. Members of our Human Resources Department will contact you when positions are available. We request that you refer to us all qualified candidates, including women, individuals of color, protected veterans, and individuals with disabilities.

Sincerely,

Mrs. Melissa Herren

Affirmative Action Officer

Exhibit B - Annual Notification to Vendors

To Whom It May Concern:

This letter is to inform you Oklahoma State University-Oklahoma City is committed to the principles of equal employment opportunity. Moreover, as a government contractor subject to by Executive Order 11246, as amended, the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended, and Section 503 of the Rehabilitation Act of 1973, as amended, Oklahoma State University-Oklahoma City takes its affirmative action obligations very seriously. Oklahoma State University-Oklahoma City states as its Policy of Affirmative Action the following:

- It will be the policy of Oklahoma State University-Oklahoma City not to discriminate on the basis of sex, gender identity, sexual orientation, race, color, religious creed, national origin, physical or mental disability, protected veteran status, or any other characteristic protected by applicable law. This policy applies to all recruitment, hiring, training, and promotion decisions for all job titles.
- All employment decisions shall be consistent with the principle of equal employment opportunity, and only job related qualifications will be required.
- All personnel actions, such as compensation, benefits, transfers, tuition assistance, social and recreational programs, etc. will be administered without discrimination on the basis of sex, gender identity, sexual orientation, race, color, religious creed, national origin, physical or mental disability, protected veteran status, or any other characteristic protected by applicable law.

As a vendor or subcontractor, you are notified you may be subject to the regulations implementing Executive Order 11246, as amended, the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended, and Section 503 of the Rehabilitation Act of 1973, as amended, including: 41 CFR Section 60-300.5(a); 41 CFR Section 60-741.5(a); 41 CFR Section 60-1.4(a) and (c); 41 CFR Section 60-1.7(a); 41 CFR Part 60-2, 48 CFR Section 52.222-54(e); and 29 CFR Part 471, Appendix A to Subpart A with respect to affirmative action program and posting requirements.

As applicable, you shall abide by these requirements which require that covered entities not discriminate and take affirmative action on the basis of sex, gender identity, sexual orientation, race, color, religious creed, national origin, physical or mental disability, and protected veteran status.

To assure compliance with the University's AAP, Mrs. Melissa Herren, Affirmative Action Officer, has been designated to administer and monitor the Program and make reports to Senior Management.