EQUAL OPPORTUNITY PLAN
FOR EPA EMPLOYEES
March 1, 2014 – February 28, 2015
# THE UNIVERSITY OF NORTH CAROLINA AT CHAPEL HILL

## EQUAL OPPORTUNITY PLAN (SPA & EPA)

### TABLE OF CONTENTS

<table>
<thead>
<tr>
<th>Section</th>
<th>Title</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>I.</td>
<td>CHANCELLORS LETTER</td>
<td>1</td>
</tr>
<tr>
<td>II.</td>
<td>POLICY STATEMENT</td>
<td>2</td>
</tr>
<tr>
<td>III.</td>
<td>ESTABLISHMENT OF RESPONSIBILITIES FOR IMPLEMENTATION OF THE WRITTEN</td>
<td>3</td>
</tr>
<tr>
<td></td>
<td>AFFIRMATIVE ACTION COMPLIANCE PLAN (41 CFR 60-2.17(A))</td>
<td></td>
</tr>
<tr>
<td>A.</td>
<td>EQUAL OPPORTUNITY OFFICER</td>
<td>3</td>
</tr>
<tr>
<td>B.</td>
<td>RESPONSIBILITIES OF SENIOR ADMINISTRATIVE OFFICERS FOR EQUAL OPPORTUNITY</td>
<td>3</td>
</tr>
<tr>
<td>C.</td>
<td>EQUAL OPPORTUNITY ADVISORY COMMITTEE</td>
<td>5</td>
</tr>
<tr>
<td>D.</td>
<td>DEPARTMENTAL EQUAL OPPORTUNITY OFFICERS</td>
<td>5</td>
</tr>
<tr>
<td>IV.</td>
<td>RESPONSIBILITY FOR ESTABLISHING PROCEDURES FOR EMPLOYMENT</td>
<td>6</td>
</tr>
<tr>
<td>A.</td>
<td>PROCEDURES FOR SPA EMPLOYMENT</td>
<td>6</td>
</tr>
<tr>
<td>B.</td>
<td>PROCEDURES FOR EPA EMPLOYMENT</td>
<td>7</td>
</tr>
<tr>
<td>V.</td>
<td>IDENTIFICATION OF POTENTIAL PROBLEM AREAS (41 CFR 60-2.17(B))</td>
<td>8</td>
</tr>
<tr>
<td>VI.</td>
<td>ACCOMPLISHMENT OF PRIOR YEAR PLACEMENT GOALS (41 CFR 60-1.40(C) 41 CFR</td>
<td>9</td>
</tr>
<tr>
<td></td>
<td>60-1.12(B), -2.1(C) AND 2.16)</td>
<td></td>
</tr>
<tr>
<td>VII.</td>
<td>THE DEVELOPMENT AND EXECUTION OF ACTION-ORIENTED PROGRAMS(41 CFR 60-</td>
<td>9</td>
</tr>
<tr>
<td></td>
<td>2.17(C))</td>
<td></td>
</tr>
<tr>
<td>A.</td>
<td>SELECTION</td>
<td>9</td>
</tr>
<tr>
<td>B.</td>
<td>RECRUITMENT</td>
<td>10</td>
</tr>
<tr>
<td></td>
<td>1. Recruitment Programs for SPA Employees</td>
<td>10</td>
</tr>
<tr>
<td></td>
<td>2. Recruitment Programs for EPA Employees</td>
<td>11</td>
</tr>
<tr>
<td>C.</td>
<td>PROMOTIONS</td>
<td>12</td>
</tr>
<tr>
<td>D.</td>
<td>TRAINING</td>
<td>12</td>
</tr>
<tr>
<td>E.</td>
<td>FACILITIES</td>
<td>13</td>
</tr>
<tr>
<td>VIII.</td>
<td>INTERNAL AUDIT AND REPORTING SYSTEMS (41 CFR 60-2.17(D))</td>
<td>13</td>
</tr>
<tr>
<td>IX.</td>
<td>ORGANIZATIONAL PROFILE</td>
<td>14</td>
</tr>
<tr>
<td>X.</td>
<td>JOB GROUP ANALYSIS</td>
<td>15</td>
</tr>
<tr>
<td>XI.</td>
<td>WORKFORCE ANALYSIS</td>
<td>15</td>
</tr>
<tr>
<td>XII.</td>
<td>AVAILABILITY/INCUMBENCY ANALYSIS</td>
<td>15</td>
</tr>
<tr>
<td>XIII.</td>
<td>GOALS</td>
<td>15</td>
</tr>
</tbody>
</table>
XIV. EQUAL OPPORTUNITY AND AFFIRMATIVE ACTION PROGRAM FOR INDIVIDUALS WITH DISABILITIES AND QUALIFIED PROTECTED VETERANS .................................................. 16

A. POLICY STATEMENT .................................................................................................................. 16
B. REVIEW OF PERSONNEL PROCESSES .................................................................................. 16
C. REVIEW OF PHYSICAL AND MENTAL QUALIFICATIONS ...................................................... 16
D. REASONABLE ACCOMMODATION TO PHYSICAL AND MENTAL LIMITATIONS ...................... 16
E. Harassment Prevention .............................................................................................................. 17
F. External Dissemination of the Policy ......................................................................................... 17
G. Internal Dissemination of the Policy ......................................................................................... 17
H. Audit and Reporting System ..................................................................................................... 18
I. Responsibility for Implementation .............................................................................................. 18
J. Training ........................................................................................................................................ 18
K. Outreach ...................................................................................................................................... 18

APPENDIX A. PRIOR YEARS PLACEMENT GOALS – SPA ............................................................... 22
APPENDIX B. PRIOR YEARS PLACEMENT GOALS – EPA ............................................................... 27
APPENDIX C. PERSONNEL ACTIVITY REPORTS – SPA ................................................................. 50
APPENDIX D. PERSONNEL ACTIVITY REPORTS – EPA ................................................................. 59
APPENDIX E. CHANCELLOR’S CABINET MEETING ...................................................................... 69
APPENDIX F. ORGANIZATIONAL DISPLAY – SPA ......................................................................... 71
APPENDIX G. ORGANIZATIONAL DISPLAY – EPA ......................................................................... 77
APPENDIX H. JOB GROUP ANALYSIS – SPA .................................................................................. 85
APPENDIX I. JOB GROUP ANALYSIS – EPA .................................................................................. 89
APPENDIX J. WORKFORCE ANALYSIS – SPA ................................................................................. 91
APPENDIX K. WORKFORCE ANALYSIS – EPA ................................................................................. 95
APPENDIX L. AVAILABILITY/INCUMBENCY ANALYSIS – SPA ....................................................... 101
APPENDIX M. AVAILABILITY/INCUMBENCY ANALYSIS – EPA ....................................................... 108
APPENDIX N. GOALS – SPA .......................................................................................................... 131
APPENDIX O. GOALS – EPA .......................................................................................................... 134
I. Chancellor’s Letter

MEMORANDUM

TO: The University Community
FROM: Chancellor Carol L. Folt
DATE: March 1, 2014

The University has prepared this 2014 Equal Employment Opportunity Plan (the “Plan”) in accord with our commitment to equal opportunities in employment and in compliance with state and federal laws. The Plan brings our attention to the diversity of our workforce at Carolina and establishes procedures by which our commitment to equal employment opportunities can be achieved.

While legal requirements inform components of the Plan, our commitment to equal opportunities in our workforce is a reflection of a deeply held belief that a University community that is diverse and representative of the larger community is essential to providing quality service and education. We strongly value the extraordinary benefits diversity brings to our students, employees and the people of North Carolina.

It is our responsibility as a University community to promote equal opportunity principles in every decision impacting members of our faculty and staff. Accordingly, I hereby adopt this Plan as Chancellor and declare it effective March 1, 2014.

The University of North Carolina Chapel Hill is a constituent institution of
The University of North Carolina
Equal Opportunity Employer

1 The relevant federal regulations, which implement Executive Order 11246, can be found at 41 C.F.R. Parts 60-1 and 60-2; the relevant state regulations are set forth in title 25, subchapter 1L, section .0100 of the North Carolina Administrative Code.
POLICY STATEMENT

As part of its Equal Employment Opportunity Plan (the "Plan"), The University of North Carolina at Chapel Hill (the "University") re-affirms its commitment to providing an inclusive and welcoming environment for all members of our community and to ensuring that educational and employment decisions are based on individuals' abilities and qualifications. Consistent with this principle and applicable laws, it is therefore the University's policy not to discriminate with respect to employment terms and conditions on the basis of age, gender, race, color, national origin, religion, genetic information, disability, veteran status, or sexual orientation, gender identity or gender expression. Such a policy ensures that only relevant factors are considered and that equitable and consistent standards of conduct and performance are applied.

In furtherance of this policy, the University bases employment decisions on the principle of equal opportunity, and ensures that all employment-related decisions are in accord with the principles of equal opportunity. All personnel actions such as compensation, benefits, transfers, layoffs, terminations, sponsored training, education, tuition assistance, and social/recreational programs, are administered without regard to age, gender, race, color, national origin, religion, genetic information, disability, veteran status, or sexual orientation, gender identity, or gender expression. Retaliatory action against any employee or applicant for employment, who files a complaint or charge of employment discrimination, testifies, assists, or participates in any manner at a hearing, proceeding, or investigation of employment discrimination is prohibited. The University also prohibits unlawful harassment, and the responsibility for implementing the University's harassment policies falls upon its administrators and supervisors. Additionally, the University is committed to providing reasonable accommodations for persons with disabilities as required by law.

The University's senior administrators, as well as supervisors and managers who are authorized to make employment-related decisions, are responsible for developing this Plan, updating it annually, and implementing any equal opportunity programs. In this endeavor, these administrators, supervisors, and managers are assisted by the University's Equal Opportunity/ADA Office, the Office of Human Resources, and the Office of the Provost. The Equal Opportunity/ADA Officer is responsible for monitoring and evaluating the Plan and for presenting periodic reports to the Chancellor.

Carol L. Folt, Chancellor

Date

1 Laws, regulations, and guidelines pertaining to equal employment opportunity compliance include, but are not limited to: Title VII of the Civil Rights Act of 1964, as amended; the Equal Pay Act of 1963; the Age Discrimination in Employment Act of 1968, as amended; Executive Order 11246, as amended; the Rehabilitation Act of 1973; the Civil Rights Restoration Act of 1988, as amended; the Americans with Disabilities Act of 1990, as amended; the Civil Rights Act of 1991; and N.C. Gen. Stat. § 126-16, as amended.

2 Applicants or employees that allege discrimination based on sexual orientation, gender identity or gender expression are limited to the University's internal grievance process.
III. Establishment of Responsibilities for Implementation of the Written Affirmative Action Compliance Plan (41 CFR 60-2.17(a))

A. Equal Opportunity Officer

The Equal Opportunity Officer for the University reports to the Vice Chancellor for Workforce Strategy, Equity and Engagement. The duties of the Equal Opportunity Officer include the following:

1. To monitor continuously the administration of the Plan;
2. To help devise systems for the implementation of the Plan and the achievement of its goals, including forms and procedures for the continuous reporting and monitoring of appointment, promotion, and salary actions;
3. To advise and assist the Chancellor and Senior Administrative Officers with respect to equal opportunity matters;
4. To receive complaints and concerns from individuals and groups with respect to personnel actions alleged to have been based on discrimination in regard to race, color, gender, national origin, age, religion, genetic information, disability, veterans status, sexual orientation, gender identity or gender expression and to advise and assist such complainants in the handling of such complaints;
5. To identify problems with respect to the implementation of the Plan;
6. To keep the members of the University community informed of the progress and problems in the administration of the Plan;
7. To evaluate the effectiveness of the Plan;
8. To serve as The University’s liaison with the U.S. Departments of Labor and the United States Department of Education and other appropriate federal agencies with respect to equal employment opportunity matters;
9. To be a point of contact with organizations representing women, minorities, individuals with disabilities (IWDs), and veterans;
10. To meet with and keep Senior Administrative Officers informed of developments in the entire equal opportunity area;
11. To advise the Chancellor concerning any needed revision of the University’s Plan.

B. Responsibilities of Senior Administrative Officers for Equal Opportunity

The Equal Opportunity Officer and the Equal Opportunity Advisory Committee have their essential roles in the achievement of equal employment opportunity in the University - roles as policy advisors, critics of performance, channels of information on
problems and solutions, and other helpful roles. But the achievement of the goals of equal employment opportunity - the employment of larger numbers of minorities and women in those sectors of University employment where they are not now found in numbers commensurate with their availability - will depend on the people with day-to-day responsibility for making employment decisions in the University. This responsibility rests with the group of officers referred to in this Plan as the senior administrative officers of the University – the Provost, Vice Chancellor for Workforce Strategy, Equity and Engagement, Deans, Directors and Department Chairs, and all other administrative personnel in the University who have responsibilities in appointing, promoting and setting the salaries of University staff personnel.

Responsibility for guiding and monitoring the thoroughness and effectiveness of efforts of schools and departments to employ more minorities and women for the faculty rests with the Provost. The Provost is the university’s principal academic officer and is responsible for administering the academic operation of the University. The Provost exercises the primary responsibility in the goal-setting process. The Provost has the responsibility for reviewing all recommended appointments to the faculty and all promotions within the faculty. The Provost is responsible for ensuring that the necessary employment related reports are completed which pertain to all academic appointments. The Provost has the authority to require the schools and departments to comply with the equal opportunity policies of the University. But most important, the Provost has the responsibility for ensuring that the academic programs of the University are successful and that equitable treatment of applicants and current faculty in the academic area and the goals of equal opportunity are achieved concurrently.

The faculty shares this responsibility with respect to faculty appointments and promotions. The faculty has a vital role in making the decisions pertaining to faculty employment.

The responsibility for oversight of EPA Non-Faculty lies with the Vice Chancellor for Workforce Strategy, Equity and Engagement. In these instances, they also have the primary responsibility for achieving the ends of equal opportunity with respect to EPA non-faculty as well as the faculty. The other senior administrative officers who report to the Chancellor have similar responsibility with respect to the EPA non-faculty personnel within their units.

Departments are responsible and accountable together with the Equal Opportunity Officer, the Office of Human Resources and the University administration for meeting University goals which are designed to eliminate the under-utilization of minority, female, individuals with disabilities, and veteran employees and the barriers to equal opportunity that cause this under-utilization, and for compliance with University and State employment policies and procedures.

In the case of Staff personnel, it is the responsibility of the Office of Human Resources to act in effective support of the equal opportunity goals and programs by carrying out various administrative activities in coordination with the Equal Opportunity/ADA Office.
C. **Equal Opportunity Advisory Committee**

The Equal Opportunity Advisory Committee advises and assists the Equal Opportunity/ADA Office in the effective performance of the duties of the office and provides an independent, informed, and concerned voice with respect to the achievement of the goals of equal opportunity. The views of minorities and women are fully represented on this Committee.

D. **Departmental Equal Opportunity Officers**

Another factor in implementing the Plan is the designation in each department of a person, called the Equal Opportunity Officer, who is responsible for seeing that the requirements of the University are carried out in that department. The Equal Opportunity Officer is a person designated by the department head and may not be the department head. In academic departments, the Equal Opportunity Officer should be a senior faculty member. In the case of large departments, a chair may designate more than one person to serve as Equal Opportunity Officer. The Equal Opportunity Officer must be familiar with the Plan, committed to its goals, and willing and able to devote sufficient time to the responsibilities of the position. The most crucial responsibility of the Equal Opportunity Officer is to scrutinize the search process at those points at which candidates are excluded from further consideration and examine the criteria upon which those exclusions are based. The department chair is expected to provide the appropriate support to the Equal Opportunity Officer.

Such a person at the department level makes possible two-way communication and visibility. These officers, appointed at the request of the Chancellor and by the principal administrative officers in the respective units, will work with members of the department, the department staff, the appropriate dean, director or department chair and the Equal Opportunity Officer to implement and monitor compliance with the policies and procedures in the University’s Plan.

Should the Equal Opportunity Officer perceive difficulties or deficiencies in compliance at any stage of the recruitment and hiring process, s/he should consult directly with their designated HR representative; Dean’s Office Human Resources staff; Employment and Staffing; Senior Director of Employment and Staffing, Senior Director of Classification & Compensation or the University Equal Opportunity Officer. Moreover, should Human Resources staff and/or the University Equal Opportunity Officer become aware of serious deficiencies in the selection process, s/he may request review by the academic officer next in line to whom the head of the appointing department reports.

Within the framework of the University's established staff employment procedures, departments have day-to-day responsibility, shared with the Office of Human Resources, for ensuring that employment decisions are made in accordance with the University's Equal Opportunity policy. When the Interim and Final Selection Documents are submitted, they shall contain an assurance from the department representative as to
whether, at each stage of recruitment and selection, that process has conformed to the principles and objectives of the Plan.

IV. Responsibility for Establishing Procedures for Employment

The University has established procedures for two groups of employees:

- Subject to State Personnel Act Employees (SPA Employees)
- Exempt from State Personnel Act Employees (EPA Employees)

The monitoring process covers recruiting methods, initial appointments, promotions, reclassifications, transfers, demotions, reappointments and salary-setting actions. These decisions and actions are amply documented to permit the required monitoring.

A. Procedures for SPA Employment

The responsibility for designing the reporting forms, procedures and schedules, and for devising the methods of review of the reports and of the results achieved through equal opportunity programs undertaken, is that of the University Equal Opportunity Officer, Senior Director of Employment and Staffing, Senior Director of Classification & Compensation and the senior administrative officers.

Among the most important responsibilities of the Equal Opportunity Officer in monitoring the administration of the Plan is the scrutiny of the search process. The timing and nature of affirmative action in the initial hiring of SPA staff is crucial to the success of the Plan in employment generally. Affirmative action efforts should help to assure that recruiting and advertising efforts, both formal and informal, reach the widest possible number of potentially qualified and interested minority, female, individuals with disabilities and veteran candidates.

For this reason, Human Resources staff complete a Recruitment Plan (HR96 – Part 1) for each SPA position recruited which includes information about the vacant position, information on where the position was advertised above and beyond the Office of Human Resources website, what special efforts were made to identify minority, female, individuals with disabilities and veteran candidates, and any other information evidencing a thorough search plan. The affirmative action process is structured so the Departmental Equal Opportunity Officer and/or Employment, Classification & Compensation staff can comment before key decisions are made, so that his or her advice may be considered in a timely fashion prior to any step in a particular selection process that will otherwise exclude from further consideration a substantial portion of the candidates who are minorities, female, individuals with disabilities or veterans.
B. Procedures for EPA Employment

Among the most important responsibilities of the Equal Opportunity Officer in monitoring the administration of the Plan is the scrutiny of the search process.

The timing and nature of affirmative action in the initial hiring of tenure track faculty is crucial to the success of affirmative action in faculty employment. Affirmative action efforts should of course help to assure that recruiting and advertising efforts, both formal and informal, reach the widest possible number of potentially qualified and interested minority, female, individuals with disabilities and veteran candidates.

For this reason, the Equal Opportunity Officer requires submission of a Recruitment Plan which must include a description of each vacant faculty or EPA non faculty position, information on where the position will be advertised, what special efforts will be made to identify minority, female, individuals with disabilities and veteran candidates, and any other information evidencing a thorough search plan.

The affirmative action process is structured so that the Equal Opportunity Officer can comment before key decisions are made, so that his or her advice may be considered in a timely fashion. With regard to tenured or tenure-track faculty positions, affirmative action plans should provide for consultation between the faculty members involved in the selection process (or his or her college, school, or departmental representative) and the Equal Opportunity Officer prior to any step in a particular selection process that will otherwise exclude from further consideration a substantial portion of the candidates who are minorities, females, individuals with disabilities and veteran candidates. Departmental Equal Employment Opportunity Officers are required to submit to the Equal Opportunity/ADA Office an Interim Equal Opportunity document at the point at which the hiring department has identified the group of applicants from which those who are to be interviewed on campus will be selected. No candidate may be invited to campus for interview until the Equal Opportunity Officer has approved the Interim document. If, at this point, the Equal Opportunity Officer perceives a problem in the search process, he or she will request a review by the academic officer next in line to whom the head of the appointing department reports. The last stage of the search process is the submission of the Final Equal Opportunity Document to the Equal Opportunity/ADA Office at the time that the department is ready to recommend a candidate for appointment. Again, should the Equal Opportunity Officer perceive deficiencies in the search process, he or she will request a review by the appropriate academic officer.

The object of these procedures is not to substitute the Equal Opportunity Officer's judgment for the academic judgment of the faculty members in the hiring department but rather to provide for timely consultation focusing on the following questions:

1. Have recruitment and solicitation efforts provided an adequate representation of minority, female, individuals with disabilities and veteran candidates in light of what is known about their availability in the specific discipline?
2. Is it clear that any minority, female, individuals with disabilities and veteran candidates who have been excluded from further consideration are less qualified than those who remain under consideration or the individual(s) recommended for appointment?

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

In making an in-depth analysis of the University of North Carolina at Chapel Hill’s total employment process, particular attention has been paid to those categories where minority groups and women may face impediments to equal opportunity. A detailed discussion of this subject is set forth in the Utilization Analysis section of the Plan.

Due to the budget cuts from the State, the University has had a reduction in force for SPA employees. The impact has affected women and minorities. In addition, there are restrictions on salary increases based on state guidelines.

The number of minority Faculty overall has increased 11.7% this past year from 675 to 754. The percentage for all minority groups also increased. Asians make up 10% (10.4) of the total Faculty, African Americans 5% (5.2) and Hispanics 4% (3.8). American Indians, Native Hawaiian and Other Pacific Islanders, and Two+ Race Faculty reached a representation of 1%. Continued efforts will be made to increase the representation of African Americans, Hispanics, American Indians and Native Hawaiian and Other Pacific Islanders Faculty.

In reviewing applicant data, the number of applicants for identified underrepresented minorities is lower than we’d like to see. We are making efforts to increase those numbers with more targeted advertisements and outreach to minority groups.

An analysis of the personnel practices and procedures of the University of North Carolina at Chapel Hill has revealed the following:

A. The composition of the workforce in terms of the overall numbers of minority groups and women continues to reflect the University of North Carolina at Chapel Hill’s strong commitment to equal employment opportunity.

B. The University of North Carolina at Chapel Hill’s intention is to examine periodically the workforce composition and to establish appropriate goals in order to improve the representation of minorities and women where impediments may exist.

C. Goals are established when the population of women or minorities in a job group is significantly less than the determined availability. It is the University of North Carolina at Chapel Hill’s intention to establish appropriate goals in order to improve the representation of minorities and women where disparities exist.

D. The University of North Carolina at Chapel Hill has examined its total selection process, including position descriptions, job titles, application forms, interview procedures, referral procedures, the final selection process, training, compensation systems and personnel activities. The result of this review has been to ensure that such
personnel practices are being uniformly applied without regard to race, color, age, religion, genetic information, disability, military status, gender, or national origin. The Equal Opportunity Officer is responsible for reviewing this selection process periodically to assure that any requisite qualifications are job-related and nondiscriminatory, and that all selection procedures are gender and race neutral.

E. The University of North Carolina at Chapel Hill’s physical facilities, sponsored recreation and social events and special programs, including educational assistance, are all applied and made available on a nondiscriminatory basis. The use of the University of North Carolina at Chapel Hill’s facilities will not be permitted on any basis inconsistent with the equal employment opportunity policy. All new employees are advised that all employee benefits, salaries and benefit programs are administered in a totally nondiscriminatory fashion. The Equal Opportunity Officer is responsible for periodically reviewing these personnel areas to ensure that there is no such discrimination.

F. Management desires to make the work environment in the University of North Carolina at Chapel Hill supportive of equal employment opportunity and has made efforts to obtain the views of the employees.

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

The University of North Carolina at Chapel Hill developed action-oriented programs designed to accomplish the established goals and objectives, thereby enhancing the employment and advancement opportunities for minorities and women. These efforts resulted in achieving some goals and objectives, making significant progress toward accomplishing others, and strengthening the affirmative action program overall. The results of the prior year’s Affirmative Action Plan are identified on the following report.

A. Prior Year Placement Goals – SPA

Goals for the 2013 plan year for SPA employees are included in Appendix A.

B. Prior Year Placement Goals - EPA

Goals for the 2013 plan year for EPA employees are included in Appendix B.

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

The following action-oriented programs or procedures designed to further the University of North Carolina at Chapel Hill’s commitment to Equal Employment Opportunity are continuing:

A. Selection
The University of North Carolina at Chapel Hill continues to evaluate the entire selection process and to make every good faith effort to select persons according to ability and qualifications, while recognizing its commitment to take affirmative action to remove impediments to women and minority entrants. Recruitment sources are notified of the University of North Carolina at Chapel Hill’s policy of nondiscrimination. There is no department or job group in the University of North Carolina at Chapel Hill that is limited or closed to employees of a particular race, color, gender, national origin, age, religion, genetic information, disability, veterans status, sexual orientation, gender identity or gender expression. Further, to help bring about Equal Employment Opportunity, the University of North Carolina at Chapel Hill analyzes all selection techniques and employment standards periodically and, where they are found to create a potential impediment for minorities or women, to revise them unless they are job-related. The Office of Human Resources provides a variety of course offerings in recruitment and selection and salary administration several times throughout the year, including: Career Banding 101; EPA Recruitment and EEO Topics; HRIS Recruiting and Hiring; Interviewing Skills for Supervisors; and SPA Hiring—From Posting to Probation. Each of these classes stresses the importance of affirmative recruitment, equal opportunity and fair pay practices.

B. Recruitment

The University of North Carolina at Chapel Hill uses the following techniques to maintain a satisfactory flow of qualified minority and female applicants:

1. Recruitment Programs for SPA Employees

Continuing recruitment activities for staff employees include the following:

- Posting the Staff Openings List daily on the on-line application system (PeopleAdmin) at www.jobs.unc.edu. The list is also posted at the Administrative Office Building, 104 Airport Drive each Wednesday by Employment & Staffing.

- Briefing sessions held with recruiting sources;

- Participating in Career Day programs offered at community colleges and technical schools, or at Job/Career Fairs sponsored by recruiting sources, community organizations and other area employers;

- Periodically contacting community organizations such as the Division of Employment Security, Triangle Industry Liaison Group (TILG), Orange County Chamber of Commerce as well as organizations for veterans and individuals with disabilities.

- Providing the www.jobs.unc.edu URL to other agencies, such as the Division of Employment Security, the University of North Carolina-
General Administration, and the Office of Human Resources to establish links between the websites.

- Providing collateral materials such as a recruitment tri-fold and marketing items to agencies, minority groups, and community organizations.

- Placing advertisements, as appropriate, in diversity recruiting sources such as the Minority Times and the American Black Business News, as well as widely circulated daily newspapers such as the News and Observer, Durham Herald/Sun and Burlington Times; cross-posting on Monster.com and Careerbuilder.com partner diversity sites.

- Contacting representatives of vocational rehabilitation offices. Employment and Staffing tracks referrals for SPA positions via Excel spreadsheet. Applications will be reviewed and referred if minimum qualifications are met.

- Attending and networking at professional meetings including Chamber of Commerce and Triangle Industry Liaison Group (TILG) meetings.

2. **Recruitment Programs for EPA Employees**

Recruitment for faculty and EPA non-faculty positions includes:

- Advertising broadly as appropriate in national professional journals and newspapers, regional journals and newspapers and web based recruiting sources;

- Letters and announcements to other colleges and universities;

- Networking and interviewing at professional meetings;

- Special efforts to identify minority and female candidates through professional caucuses, organizations and schools with significant minority enrollments;

- Every effort is made to include minorities and women on search committees;

- Regular contacts with representatives of veteran’s groups, including the Employment Security Commission;

- All positions are posted automatically in UNC Employment Opportunities and Inside Higher Ed Jobs.com; and

- All advertisements include the statement: “The University of North Carolina at Chapel Hill is an Equal Opportunity Employer” or “EOE”. 
C. **Promotions**

The University of North Carolina at Chapel Hill will periodically review its promotion criteria and procedures to ensure that promotional decisions are made without regard to race, color, gender, national origin, age, religion, genetic information; disability, veterans status, sexual orientation, gender identity or gender expression. In an effort to maintain acceptable promotion rates for qualified minorities and women, the University of North Carolina at Chapel Hill utilizes the following procedures:

1. Providing job training, including such assistance as tuition reimbursement.
2. Providing an employee evaluation program.
3. Reviewing work specifications to ensure job-relatedness.
4. Reviewing promotional decisions and requiring such decisions to be justified on a nondiscriminatory basis.

D. **Training**

The University of North Carolina at Chapel Hill’s Training & Talent Development department offers extensive training opportunities, including: Diversity in the Workplace, Diversity in the Workplace for Supervisors, Conversation Circle - Opening Doors and Managing Diverse Work Styles, etc. These courses are for University employees interested in learning to work effectively and build relationships or partnerships in an increasingly diverse work environment. The course offerings are free for employees. Information about these and other human resource related courses can be found at the following URL [http://hr.unc.edu/training-talent-development/](http://hr.unc.edu/training-talent-development/)

In addition the Equal Opportunity/ADA Office offers classroom training courses on Preventing Unlawful Harassment in the Workplace and the Americans with Disabilities Act (ADA). The EO/ADA Office also offers new and updated on-line equal opportunity courses including Unlawful Harassment Prevention for Higher Education, EEO Laws and Discrimination Prevention for Higher Education, and Title IX Awareness and Violence Prevention. All three on-line courses are required for all UNC faculty and staff. Search Committee training and PeopleAdmin training are also available to the entire University community. The Unlawful Harassment Prevention for Higher Education, EEO Laws and Discrimination Prevention for Higher Education, and Title IX Awareness and Violence Prevention training is required for all supervisors and managers as is the Search Committee Training for committee members.

Beginning in spring 2014, the Office of Human Resources is also launching the Blueprint for Engaged Supervision Training (BEST) program, which is a suite of professional development classes and learning opportunities designed to educate and motivate UNC’s frontline supervisory team. It is comprised of eight classes, six pre-selected core classes and two electives that include a combination of instructor-led and online delivery options.
Participants will have one and one half years to complete the program and is mandatory.

All educational and other training programs sponsored by the University are open to qualified employees without regard to race, color, gender, national origin, age, religion, genetic information, disability, veteran’s status, sexual orientation, gender identity or gender expression. Employees are encouraged to avail themselves of these benefits in response to a planned, continuing variety of communications from the Human Resources Training and Talent Development Department. Educational leaves may be granted by the University for purposes that will tend to make its employees more valuable.

E. Facilities

The University of North Carolina at Chapel Hill continually makes certain that its facilities and university-sponsored social and recreational activities are not segregated, and actively encourages all employees to participate in any such university-sponsored events.

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

The University of North Carolina at Chapel Hill’s audit and reporting system is designed to:

- Measure the effectiveness of the Plan;
- Document personnel activities;
- Identify problem areas where remedial action is needed; and
- Determine the degree to which the Plan goals and objectives have been obtained.

The following personnel activities are reviewed to ensure nondiscrimination and equal employment opportunity for all individuals:

- Recruitment, advertising and job application procedures;
- Hiring, promotion, upgrading, award of tenure, layoff and recall from layoff;
- Rates of pay and any other forms of compensation including fringe benefits;
- Job assignments, job classifications and job descriptions;
- Sick leave, leaves of absence or any other leave;
- Training, apprenticeships, and attendance at professional meetings and conferences; and
- Any other term, condition or privilege of employment.
Responsibility for monitoring, analyzing and evaluating the University’s equal opportunity progress rests with the Equal Opportunity Officer and, for SPA employees, the Employment, and Classification & Compensation Department within the Office of Human Resources. The following data is reviewed as part of the internal audit process:

- Applicant flow and application referral data by race, sex, interview status and the action taken for individuals applying for job opportunities;
- Summary data of job offers and hires, promotions, resignations, terminations, and layoffs by job group and by race and sex;
- Summary data of applicant flow by identifying, at least, total applicants, total minority applicants, and total female applicants for each position; and
- Records pertaining to the University of North Carolina at Chapel Hill’s compensation system.

The audit system includes periodic reports documenting the university’s efforts to achieve its equal opportunity and affirmative action responsibilities. Annually the Equal Opportunity Officer and, for SPA employees, the Employment and Classification & Compensation Department within the Office of Human Resources, compiles and analyzes an extensive report covering all aspects of equal opportunity progress. Personnel activity reports for SPA and EPA employees are included in Appendices C and D, respectively.

The matter of procedures employed and records kept in the course of recruitment, appointment, reappointment, and promotion activities of the schools and departments and of the officers and committees that review those actions are subject to continuing review and evaluation by the senior administrative officers of the University and by the Equal Opportunity Officer.

The Equal Opportunity Officer will meet with and keep Senior Administrative Officers informed of developments in the entire equal opportunity area.

The University will, at appropriate intervals, re-examine the various aspects of its equal opportunity efforts. Should any instances of discrimination be discovered in such analyses, or by other available means, the appropriate University officials will take corrective action promptly.

IX. Organizational Profile - as of September 30, 2013

A. SPA

The Organizational Profile of SPA employees is included as Appendix F.

B. EPA

The Organizational Profile of EPA employees is included as Appendix G.
X. **Job Group Analysis - as of September 30, 2013**
   A. SPA
   The Job Group Analysis of SPA employees is included as Appendix H.
   B. EPA
   The Job Group Analysis of EPA employees is included as Appendix I.

XI. **Workforce Analysis - as of September 30, 2013**
   A. SPA
   The Workforce Analysis for SPA employees is included in Appendix J.
   B. EPA
   The Workforce Analysis for EPA employees is included in Appendix K.

XII. **Availability/Incumbency Analysis - as of September 30, 2013**
   A. SPA
   The Availability/Incumbency Analysis for SPA employees is included in Appendix L.
   B. EPA
   The Availability/Incumbency Analysis for EPA employees is included in Appendix M.

XIII. **Goals**
   A. SPA
   Placement goals for the 2013 plan year for SPA employees are included in Appendix N.
   B. EPA
   Placement goals for the 2013 plan year for EPA employees are included in Appendix O.
XIV. Equal Opportunity and Affirmative Action Program for Individuals with Disabilities and Qualified Protected Veterans

A. Policy Statement

The University of North Carolina will not discriminate against any employee or applicant for employment because of a physical or mental disability or because he or she is a disabled veteran, veteran of the Vietnam Era or other qualified veteran in regard to any position for which the employee or applicant for employment is otherwise qualified. The University agrees to take affirmative action to employ, advance in employment and otherwise treat qualified disabled individuals, qualified veterans and veterans of the Vietnam Era without discrimination based upon their disability or veteran’s status in all employment practices. The University will recruit, hire train and promote persons in all job titles, and ensure that all other personnel actions are administered, without regard to disability or veteran’s status; and ensure that all employment decisions are based only on valid job requirements.

In furtherance of this policy, the University prohibits retaliatory action against any employee or applicant for employment who makes a charge of employment discrimination, testifies, assists or participates in any manner at a hearing, proceeding, or investigation of discrimination in an employment complaint.

B. Review of Personnel Processes

The University of North Carolina at Chapel Hill has reviewed its personnel processes and determined that its present procedures are careful, thorough, and systematic in their consideration of the job qualifications of applicants and employees who are qualified protected veterans and individuals with disabilities. The University analyzes specific job qualifications every time there is a job vacancy to ensure that the qualification requirements do not tend to screen out individuals with disabilities or qualified protected veterans. This analysis is completed on an individual basis should an individual with disabilities or qualified protected veterans be excluded from an open position. All qualification requirements approved by the University are job related or consistent with business necessity and the safe performance of the job.

C. Review of Physical and Mental Qualifications

The University reviews the physical and mental job qualification standards to ensure that, to the extent qualifications standards tend to screen out qualified individuals with disabilities or qualified protected veterans, they are job related for the position in question and are consistent with business necessity. All qualification requirements approved are job related or consistent with business necessity and the safe performance of the job.

D. Reasonable Accommodation to Physical and Mental Limitations

Per the ADA Reasonable Accommodations in Employment Policy, the University makes reasonable efforts to accommodate disabled individuals and/or veterans unless to do so
would impose an undue hardship or change the essential functions of the position. The Equal Opportunity Officer, in consultation with other University offices, is responsible for ensuring that appropriate accommodations are available for employees or applicants for employment who self-identify.

E. **Harassment Prevention**

The University has procedures to ensure that its employees with disabilities are not harassed because of the disability. Employees with complaints alleging discrimination because of his or her disability and/or veterans’ status are encouraged to utilize the Policy on Prohibited Harassment, Sexual Misconduct, and Discrimination and grievance procedure(s) currently in effect in the University.

Faculty and Non Faculty employees or applicants should address their concerns to:

Equal Opportunity/ADA Office  
100 E. Franklin Street, Ste. 110  
CB #9160  
(919) 966-3576

Or to:

Employment & Management Relations  
104 Airport Drive, CB #1045  
(919) 843-3444

F. **External Dissemination of the Policy**

The University undertakes appropriate outreach and positive recruitment activities. All recruiting sources, including state employment agencies, state vocational rehabilitation agencies, organizations of or for individuals with disabilities and veteran’s service organizations are informed of the university’s policy concerning the employment of qualified individuals with disabilities and qualified protected veterans and have been advised to actively recruit and refer qualified persons for job opportunities.

G. **Internal Dissemination of the Policy**

The University disseminates this policy internally as follows:

1. All employees are advised annually of the University’s policy and encouraged to support it;

2. Inform all employees and prospective employees of its commitment to engage in affirmative action to increase employment opportunities for qualified individuals with disabilities and qualified protected veterans. The policy is included in employee orientation and management training programs; and
3. Applicants and employees who believe they are qualified individuals with a disability, or who are a qualified protected veteran are invited to identify themselves if they wish to benefit under this affirmative action program.

H. **Audit and Reporting System**

The University has designed and implemented an audit and reporting system that will:

1. Measure the effectiveness of the university’s equal opportunity and affirmative action program;

2. Indicate any need for remedial action;

3. Determine the degree to which the university’s objectives have been attained;

4. Determine whether employees identified as persons with a disability and qualified protected veterans have had an opportunity to participate in all university sponsored educational, training, recreational, and social events; and

5. Measure the University’s compliance with the affirmative action program’s specific obligations. Take necessary action to bring the program into compliance where the program is found to be deficient.

I. **Responsibility for Implementation**

The Equal Opportunity Officer has overall responsibility for implementation of the university’s equal opportunity and affirmative action programs. University senior administrators, supervisors and managers share responsibility for implementation of the Plan.

J. **Training**

All personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes shall be trained to ensure that the commitments in the University’s Plan and programs are implemented.

K. **Outreach**

Continued outreach activities for EPA employees include the following:

- Posting the Staff Openings List daily on the on-line application system (People Admin) at www.jobs.unc.edu.

- Briefing sessions held with recruiting sources;

- Participating in Career Day programs offered at community colleges and technical schools, or at Job/Career Fairs sponsored by recruiting sources, community organizations and other area employers;
- Periodically contacting community organizations such as the Division of Employment Security, Triangle Industry Liaison Group (TILG), Orange County Chamber of Commerce as well as organizations for veterans and individuals with disabilities.

- Periodically contacting and meeting with representatives from leading Black, Hispanic, American Indian and Women’s organizations in the University’s recruitment area (Alamance, Chatham, Durham, Orange and Wake counties);

- Providing the www.jobs.unc.edu URL to other agencies, such as the Division of Employment Security, the University of North Carolina-General Administration, and the Office of State Human Resources to establish links between the websites.

- Providing collateral materials such as a recruitment tri-fold and marketing items to agencies, minority groups, and community organizations.

- Placing advertisements, as appropriate, in diversity recruiting sources such as the Minority Times and the American Black Business News, as well as widely circulated daily newspapers such as the News and Observer, Durham Herald/Sun and Burlington Times; cross-posting on Monster.com and Careerbuilder.com partner diversity sites.

- Contact Business Relations Representative from the NC Division of Vocational Rehabilitation Orange, Chatham and Lee Counties to develop a referral and follow-up process for applicants from this program. Maintain regular contacts with other representatives of vocational rehabilitation.

- Continued contact with additional representatives of vocational rehabilitation offices.

Attending and networking at professional meetings including Chamber of Commerce and Triangle Industry Liaison Group (TILG) meetings.