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# University of Kentucky Affirmative Action Plan



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This Affirmative Action Plan, effective October 1, 2017, is issued as a revision of the University of Kentucky Affirmative Action Plan first issued in 1968. It supersedes all earlier plans.

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*An Equal Opportunity University*

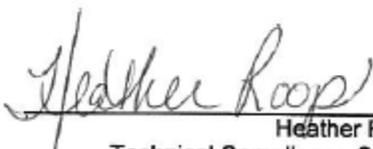
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# University of Kentucky Affirmative Action Plan

Effective October 1, 2017 through September 30, 2018

  
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*An Equal Opportunity University*

September 15, 2017



**University of Kentucky  
Office of the President**

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### **POLICY OF THE UNIVERSITY OF KENTUCKY**

The University of Kentucky Governing Regulations (Part XIV.B.1) states the University of Kentucky nondiscrimination policy:

The University of Kentucky complies with the federal and state constitutions, and all applicable federal and state laws, regarding nondiscrimination. The University provides equal opportunities for qualified persons in all aspects of University operations, and does not discriminate on the basis of race, color, national origin, ethnic origin, religion, creed, age, physical or mental disability, veteran status, uniformed service, political belief, sex, sexual orientation, gender identity, gender expression, pregnancy, marital status, genetic information, social or economic status, or whether the person is a smoker or nonsmoker, as long as the person complies with University policy concerning smoking. All University members are expected to comply with the institution's nondiscrimination policy.

A handwritten signature in cursive script that reads "Eli Capilouto".

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Eli Capilouto

seeblue.

An Equal Opportunity University

**University of Kentucky  
Affirmative Action Plan**

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## INTRODUCTION

The University of Kentucky (UK), a land grant, Rank 1 research institution located in Lexington, Kentucky, is the flagship of the Commonwealth of Kentucky's public postsecondary education system. As such the University accepts a unique mission in education, research, and service to the people of the Commonwealth of Kentucky and the greater community. The Governing Regulations as set forth by the Board of Trustees of the University of Kentucky clearly establish a fundamental guiding commitment to equal opportunity. The University of Kentucky has developed policies and procedures that guide its employment processes in an effort to ensure objective and nondiscriminatory practices.

The University of Kentucky Strategic Plan, as adopted by the Board of Trustees on October 24, 2015, outlines specific objectives. Goal 3 of the five strategic objectives states the University of Kentucky will enhance the diversity and inclusivity of our University community through recruitment and retention of an increasingly diverse population of faculty, staff and students, and by implementing initiatives that provide rich diversity-related experiences for all to help ensure their success in an interconnected world. The strategic initiatives include:

- ❖ Foster a diverse community of engaged students;
- ❖ Improve workforce diversity and inclusion;
- ❖ Engage diverse worldviews and perspectives by increasing awareness of diversity and by communications across campus that address these issues.

The 2015-2020 Strategic Plan also includes action steps and metrics that the University will use to demonstrate achievement of the goals and to show the commitment to equal opportunity. The Strategic Plan metrics for Goal 3: *Diversity and Inclusivity* include:

- ❖ Enrollment percentage of under-represented undergraduate and graduate students.
- ❖ Graduation rate for under-represented students.
- ❖ Faculty employment.
- ❖ Executive, Administrative and Managerial employment.
- ❖ Professional employment.

This document seeks to set forth the University of Kentucky's Affirmative Action Plan as required by Executive Order 11246, as amended, and detail the ongoing efforts to fulfill the University's stated equal opportunity commitment. The University of Kentucky annually commits itself to making good faith efforts to attain its affirmative action and equal opportunity goals, including initiatives that assist in building and sustaining a welcoming and inclusive University community.

## **AFFIRMATIVE ACTION FEDERAL EXECUTIVE ORDER 11246**

The Civil Rights Act of 1964, 42 U.S.C. 2000(e) prohibits discrimination in employment on the basis of race, color, religion, sex, or national origin. The Act was amended in 1972 to apply to employment by state agencies, to education institutions, and to faculty employment. In order to carry out this national policy, the President of the United States directed by Executive Order 11246, and amended by Executive Order 11375, that all federal agencies should place an "affirmative action clause" in every contract in excess of \$50,000. Anyone entering a contract with the United States, even if not otherwise obligated by law, must agree to comply with the substance of the Civil Rights Act of 1964.

As a federal contractor receiving more than \$50,000 in federal contracts annually and employing greater than 50 employees, the University of Kentucky is mandated by federal Executive Order 11246, as amended, to have a written affirmative action plan for women and minorities. The University of Kentucky in good faith affirms the components of this affirmative action plan are as required in Executive Order 11246 and as detailed in the implementing regulations, 41 CFR Chapter 60 by the Department of Labor Office of Federal Contract Compliance Programs.

The included statistical and narrative analyses, identification of problem areas, and establishment of goals and timetables are required components as set out in the aforementioned regulations. Terms used in the context of implementing regulations in no way should be read as an admission of violation of any statute, federal or state, or violation of any University of Kentucky regulation. Goals and timetables established in the context of the affirmative action program are not established as fixed quotas but rather as guidelines to support the underlying University of Kentucky commitment to equal opportunity for all persons, regardless of membership or lack of membership in a protected group. Nothing in the University of Kentucky affirmative action program is intended to sanction the discriminatory treatment of any person.

## KENTUCKY COUNCIL ON POSTSECONDARY EDUCATION DIVERSITY POLICY

Adjunct to the AAP is the Kentucky Council on Postsecondary Education Diversity Policy. The University of Kentucky commitment to provision of equal opportunity must include objectives related to student body diversity and student success, workforce diversity, and creation of a campus environment where all students, faculty and staff live and work in openness and acceptance, and feel secure and welcome.

In 1981 the U.S. Department of Education Office for Civil Rights (OCR) determined that the Kentucky public higher education system had failed to eliminate vestiges of its former de jure racially dual system of public higher education. In 1982 the Kentucky Council on Higher Education developed the 1982-1987 Commonwealth of Kentucky Higher Education Desegregation Plan. The Kentucky Plan for Equal Opportunities in Higher Education was then created for 1990-1995.

In 1992 Kentucky Senate Bill 398 was passed, codified as KRS 164.020(9), which afforded public postsecondary education institutions limited waiver options for approval to submit requests for new academic programs when failing to meet established equal opportunity objectives or make continuous progress.

The third iteration of a state equal opportunity plan, 1997-2002 Kentucky Plan for Equal Opportunities in Postsecondary Education, continued the narrowly-tailored focus of previous plans to include Kentucky resident African American students, and African American faculty and staff employees in response to identified deficiencies.

The U.S. Department of Education Office for Civil Rights notified Kentucky Governor Steve Beshear on January 2, 2009 that the Commonwealth was ruled in compliance with Title VI of the Civil Rights Act of 1964 and its implementing regulations.

The Kentucky Council on Postsecondary Education (CPE) adopted an action plan for development of a new statewide diversity policy on January 16, 2009 through a collaborative process involving CPE staff, CPE Committee on Equal Opportunities, and postsecondary education institutions. At each phase of development, the diversity policy was shared with institution Presidents and others for comment. On September 12, 2010 the Kentucky Council on Postsecondary Education adopted the Kentucky Public Postsecondary Education Diversity Policy and Framework for Institution Diversity Plan Development. This Diversity Policy, revised by CPE April 29, 2014, set forth a Diversity Definition, and Vision and Guiding Principles as follows:

## **Diversity Definition**

Diversity, as a concept, describes an inclusive community of people with varied human characteristics, ideas, and world views related, but not limited, to race, ethnicity, sexual orientation, gender, gender identity, gender presentation, religion, color, creed, national origin, age, disabilities, socio-economic status, life experiences, geographical region, or ancestry. Diversity in concept expects the creation by institutions of a safe, supportive, and nurturing environment that honors and respects those differences. The policy “focusing on a diverse student body and workforce” advocates the inclusion of students and employees from historically underserved populations.

## **Vision and Guiding Principles**

The vision of the CPE is for all public postsecondary institutions to implement strategies, programs, and services that fulfill the educational objectives set forth in HB 1, and address the needs of and support the success of diverse populations, particularly those most affected by institutional and systemic inequity and exclusion. The following principles shape the priorities and guide decisions for the Commonwealth’s vision of diversity.

- ❖ Recognize diversity as a vital component in the state’s educational and economic development.
- ❖ Affirm the long-standing commitment that Kentucky’s African American students are represented at the public colleges and universities.
- ❖ Challenge stereotypes and promote awareness and inclusion.
- ❖ Support community engagement, civic responsibility, and service that advance diverse and underserved populations/groups.
- ❖ Nurture, train, and produce students with the ability to interact effectively with people of different cultures, i.e., cross-cultural competence.
- ❖ Prepare for Kentucky’s businesses a workforce that is diverse, culturally competent, and highly educated to compete in a global economy.

To implement this Diversity Policy, CPE required each public institution to submit a campus diversity plan draft by March 31, 2011. The campus-based diversity plan draft was required to be five years in duration and address four areas including I. Student Body Diversity, II. Student Success, III. Workforce Diversity, and IV. Campus Climate.

The workforce diversity area of the Diversity Policy intends to accomplish the compelling governmental interest in the educational benefits that accrue from having diverse faculty, staff and administrative officials.

On June 9, 2011 the University of Kentucky 2011-2015 Diversity Plan draft was reviewed and approved by the CPE Committee on Equal Opportunities. On June 14, 2011 the UK Board of Trustees adopted the new UK Diversity Plan. Institutional diversity plans then received final approval by the Council on Postsecondary

Education on September 22, 2011. The University of Kentucky 2011-2015 Diversity Plan established student objectives consistent with the UK 2009-2014 Strategic Plan, and employment objectives based on the annual UK Affirmative Action Plan. The Diversity Plan contained narrative describing many programs, services and initiatives that support attainment of institutional objectives.

While similar in intent and overlapping in specific employment categories, the scope of Executive Order 11246 and the CPE Diversity Policy differ. Focused solely on equal employment opportunities Executive Order 11246 requires affirmative action for women, all minority groups, individuals with disabilities and protected veterans by federal contractors. Goals related to the CPE Diversity Policy are based on an institution's mission, values, and compelling interest in the educational benefits of diversity. Embracing and nurturing diversity as an essential value is the responsibility of every member of the University community. The UK Diversity Plan's primary student focus included Black or African American and Hispanic or Latino. For employment, the UK Diversity Plan groups are consistent with UK Affirmative Action Plan groups.

On September 23, 2016 the Kentucky Council on Postsecondary Education adopted a new diversity policy, *Kentucky Public Postsecondary Education Policy for Diversity, Equity and Inclusion*. Under this new policy, CPE set forth a very broad definition of diversity, and institutions were required to create diversity plans that addressed, at a minimum, four areas including: I. Student body diversity that mirrors the diversity of the Commonwealth or the institution's service area, II. Closing of achievement gaps, III. Workforce diversity, and IV. Campus climate. The duration of this policy is five (5) years with review commencing during the fifth year.

This statewide policy is grounded on the premise that to truly prepare students for life and work in an increasingly diverse society, public postsecondary institutions within the Commonwealth shall develop a plan to embrace diversity and equity within constitutional and legal parameters, commit to improving academic achievements for all students, create an inclusive campus environment, and produce culturally competent graduates for the workplace. Diversity is defined as people with varied human characteristics, ideas, world views, and backgrounds. Diversity in concept expects the creation by institutions of a safe, supportive, and nurturing environment that honors and respects those differences.

In congruence with CPE's Strategic Agenda, this policy identifies three (3) focus areas: Opportunity - Recruitment, and Enrollment of Undergraduate and Graduate Diverse Students; SUCCESS – Student Success for Retention, Graduation Rates, and Degree Conferred to Underrepresented Minority and Low-Income Students, and; Impact – Campus Climate, Inclusiveness and Cultural Competency including Workforce.

To implement this policy, each institution created a campus-based plan for diversity, equity, and inclusion, which addresses the goals and strategies in the three (3) focus areas and outlines an appropriate plan for assessment. Every goal and strategy must be assessed annually. CPE will review institutional assessment reports using a scored rubric. Institutions that do not meet standards of the rubric will not be eligible to submit requests for new academic programs. To receive consideration by CPE to become eligible during a calendar year when standards are not attained, a Request for Waiver which includes a Remediation Plan is required.

The University of Kentucky Diversity Plan is consistent with the 2015-2020 UK Strategic Plan, and employment objectives based on the annual Affirmative Action Plan. This plan received approval by the UK Board of Trustees during their September 15, 2017 meeting. The UK Diversity Plan is available in its entirety at <http://www.uky.edu/diversity/sites/www.uky.edu.diversity/files/pr3.pdf>.

The University of Kentucky's unique role as the Commonwealth's land grant educational institution and its mission related to equal educational opportunity cannot be overlooked in this document. Success in providing equal opportunity in student enrollment, retention, and graduation is an essential corollary to equal employment opportunity at the University of Kentucky, the greater community, and state and national labor markets.

The University of Kentucky Affirmative Action Plan as outlined in this document is put forth as evidence of the institution's good faith effort to meet all the requirements of a federal contractor as prescribed in Executive Order 11246, as amended, and as detailed in the implementing federal regulations 41 CFR § 60. This document reaffirms the University of Kentucky's commitment to equal opportunity as defined by federal and state statutes. Further, the University of Kentucky Affirmative Action Plan is reaffirmation of the commitment to equal opportunity as defined by the Board of Trustees in the Governing Regulations and proffered as a supporting document to the University of Kentucky 2015-2020 Strategic Plan.

Strategic Initiative 2: **Improve Workforce Diversity and Inclusion** Action Step 1: Provide formal inclusiveness and diversity professional development for all faculty, staff, managers, and supervisors, including training on explicit (conscious) and implicit (unconscious) bias and training on how to structurally create inclusive working and learning environments. Action Step 2: Increase diversity in number, proportion and retention in all workforce position categories including faculty, where representation is less than proportionate, to create a more inclusive work environment.

## REAFFIRMATION OF EQUAL EMPLOYMENT OPPORTUNITY POLICY

The University of Kentucky hereby reaffirms its commitment to the principle of equal employment opportunity in its personnel policies and procedures. The University of Kentucky [Governing Regulations Part XIV.B.1](#), governing both instructional and non-instructional personnel, states the University of Kentucky nondiscrimination policy:

The University of Kentucky complies with the federal and state constitutions, and all applicable federal and state laws, regarding discrimination. The University provides equal opportunities for qualified persons in all aspects of University operations, and does not discriminate on the basis of race, color, national origin, ethnic origin, religion, creed, age, physical or mental disability, veteran status, uniformed service, political belief, sex sexual orientation, gender identity, gender expression, pregnancy, marital status, genetic information, social or economic status, or whether the person is a smoker or nonsmoker, as long as the person complies with University policy concerning smoking.

All University members are expected to comply with the institution's nondiscrimination policy. The President is responsible for the development of an affirmative action plan by which full implementation of this policy shall be effected in the University.

The revised [Governing Regulations Part I.D](#) adopted by the Board of Trustees on June 14, 2005 added a statement on diversity:

The University is committed to diversity as a vital characteristic of an optimal education and workplace. The University maintains a firm conviction that it must strengthen the diversity of its communities, support free expression, reasoned discourse and diversity of ideas; and take into account a wide range of considerations, including but not limited to, ethnicity, race, disability, and sex, when making personnel and policy decisions. The University is committed to periodically evaluating progress made toward diversity and to communicating the results of such evaluations. Based upon these assessments, the University will give diversity factors consideration to ensure achievement of its mission of instruction, research and service and gain the broadest benefits for the University community.

[Governing Regulation Part X.A.1](#) establishes merit as the only criteria for academic employment:

All appointments shall be made strictly on the basis of merit. An applicant for a position shall not be discriminated against because of race, color, national origin, ethnic origin, religion, creed, age, physical or mental disability, veteran status, uniformed service, political belief, sex, sexual orientation, gender identity, gender expression, pregnancy, marital status, genetic information, social or economic status, or whether the person is a smoker or nonsmoker, as long as the person complies with University policy concerning smoking.

Further delineation of this fundamental governing regulation is made in [Human Resource Policy Number 2.0](#) entitled "Equal Opportunity, Discrimination and Harassment" which states:

All employment decisions shall be made uniformly on the basis of merit. Equal opportunities shall be provided for all persons throughout the University in recruitment, appointment, promotion, payment, training, and other employment practices without regard to race, color, national origin, ethnic origin, religion, creed, age, physical or mental disability, veteran status,

uniformed service, political belief, sex, sexual orientation, gender identity, gender expression, pregnancy, marital status, genetic information, social or economic status, or whether the person is a smoker or nonsmoker, as long as the person complies with University policy concerning smoking.

The Strategic Plan of the University states:

*Strategic Objective: Diversity and Inclusivity.* Enhance the diversity and inclusivity of the University community through recruitment and retention of an increasingly diverse population of faculty, administrators, staff, and students, and by implementing initiatives that provide rich diversity-related experiences for all to help ensure their success in an interconnected world.

The University will achieve this by working collaboratively to create an environment where all of our students, faculty, and staff live or work in an environment of openness and acceptance, and in which people of all backgrounds, identities, and perspectives can feel secure and welcome.

This strategy extends beyond employment, to the matriculation of students at all levels of academic endeavor. Equal Opportunity for students at the University of Kentucky is delineated in the student handbook entitled Student Code of Conduct, which states:

#### Right of Admission and Access

##### Admission Policy, Scholarships, Grants-in-Aid, and Financial Aid

UK complies with the federal and state Constitutions, and all applicable federal and state laws, regarding nondiscrimination. Students and applicants for admission to UK, or for financial aid or scholarship, will not be discriminated against because of race, color, national origin, ethnic origin, religion, creed, age, physical or mental disability, veteran status, uniformed service, political belief, sex, sexual orientation, gender identity, gender expression, pregnancy, marital status, genetic information, social or economic status, whether the person is a smoker or nonsmoker, as long as the person complies with UK policy concerning smoking.

##### Use of Facilities and Services

The University may delineate the purpose for which students may use certain facilities and shall make them available on a fair and equitable basis. However, the University may restrict its facilities and services when their use would interfere with normal University operations.

##### Discrimination in the Community

The University will use its influence to secure equal access for all students to public facilities in the local community.

The Office of Institutional Equity and Equal Opportunity is the University office responsible for the development of policy and monitoring of compliance with all of the University of Kentucky equal opportunity commitments. The Office of Institutional Equity and Equal Opportunity is responsible for the ongoing analysis and reporting under the Affirmative Action Plan. Anyone having questions or comments regarding

the University of Kentucky equal opportunity and affirmative action policies should contact the Office of Institutional Equity and Equal Opportunity.

## **DISSEMINATION OF THE EQUAL OPPORTUNITY POLICY**

Regulation pertinent to this portion of the AAP is 41 CFR § 60-2.13(b)

### **Internal Dissemination**

- ❖ The Equal Opportunity Policy statement is posted in University employment offices, placement offices and other appropriate areas.
- ❖ The policy statement is included in all appropriate University publications including all employee handbooks and policy books, which are available to all employees on the web. New employees receive copies of the statement and other information about the University's policy of equal opportunity at orientation programs.
- ❖ Training sessions are conducted by the University's Office of Institutional Equity and Equal Opportunity with departments and colleges to highlight the University's commitment to diversity, equal opportunity and affirmative action. All new supervisors are required to attend discrimination and harassment training through SuperVision.
- ❖ The Office of Institutional Equity and Equal Opportunity conducts annual meetings with University officials to review their responsibility for effective implementation of the University's Equal Opportunity Policy.
- ❖ University brochures, newsletters, annual reports and other publications reiterate the University's commitment to equal opportunity.
- ❖ The equal opportunity policy is included in all purchase orders, requisitions, and contracts covered by Executive Order 11246 (as amended) and implementing regulations.

### **External Dissemination**

- ❖ The University communicates to prospective employees in all employment advertisements that it is an Equal Opportunity Employer.
- ❖ All contractors, subcontractors, vendors, and suppliers have been notified of the University's Equal Opportunity Policy and are required to comply with Executive Order 11246 (as amended) and its implementing regulations. The University has agreed to transact business only with firms adhering to these practices.
- ❖ All recruiting sources and other referral sources have been advised of the University's Equal Opportunity Policy.

## **DISSEMINATION OF THE AFFIRMATIVE ACTION PLAN**

The University of Kentucky Affirmative Action Plan as detailed in this document must be submitted upon request to the United States Department of Labor Office of Federal Contract Compliance Programs (OFCCP). The written University of Kentucky Affirmative Action Plan (AAP), in accordance with Executive Order 11246, as amended, Section 503 of the Rehabilitation Act of 1973, and The Vietnam Era Veterans' Readjustment Assistance Act of 1974 (VEVRAA), may be viewed in the Office of Institutional Equity and Equal Opportunity. The AAP is available from 9:00am until noon and from 1:00pm until 4:00pm Monday through Friday when the University of Kentucky is officially in session. The AAP can also be viewed on the Office of Institutional Equity and Equal Opportunity website at [www.uky.edu/eeo](http://www.uky.edu/eeo). A hardcopy of the plan is kept at the reference desk for checkout at the William T. Young Library.

## **UNIVERSITY ANALYSES**

### **ORGANIZATIONAL PROFILE**

Regulation pertinent to this portion of the AAP is 41 CFR § 60-2.11

The University of Kentucky organizational profile is completed annually as a required component of the Affirmative Action Plan. This information is provided upon request to the OFCCP. The profile is an organizational display similar to the organizational structure of the University. It identifies each organizational unit at the University and the relationship to other units within the University. The organizational display includes the name of the unit or college, the job title, gender, race, and ethnicity of the unit or college head administrator, the total number of male and female incumbents; and the total number of male and female incumbents in each of the following groups: Black or African American, Hispanic, Asian, Pacific Islander/Native Hawaiian, and American Indian/Alaskan Native.

The organizational profile for the University of Kentucky may be found as a separate document entitled "University of Kentucky Affirmative Action Plan Organizational Profile" and located in the Office of Institutional Equity and Equal Opportunity. The profile is available from 9:00am until noon and from 1:00pm until 4:00pm Monday through Friday when the University of Kentucky is officially in session. The AAP along with the organizational profile can be viewed on the Office of Institutional Equity and Equal Opportunity website at [www.uky.edu/eeo/federal-reporting](http://www.uky.edu/eeo/federal-reporting).

### **JOB GROUP ANALYSIS**

Regulation pertinent to this portion of the AAP is 41 CFR § 60-2.12(c).

The University of Kentucky reports thirteen job groups within 6 units and 18 colleges from the University of Kentucky Information Technology Enterprise Application Group under the auspices of the Provost. Using primary occupational activity definitions corresponding with the specific job functions represented at the University for the purposes of availability, placement goals, and ratio impact analyses. The University of Kentucky also reports six additional job groups that are designed to further the educational objective of the student. Those positions are Graduate Assistant, Graduate Research Assistant, Post Doctoral Scholars, Research Assistants, Residents, Student Teaching Assistants, Student/Non-Work Study, and Visiting Scholars. These student positions are included in the utilization data only.

This analysis of job functions and division into job groups by units and colleges was undertaken for the University by the Office of Institutional Equity and Equal Opportunity during the beginning stages of the 2016 Department of Labor Office of Federal Contract Compliance Program labor compliance review.

Definitions of the thirteen job groups for the University of Kentucky may be found as AAP Appendix A.

**PLACEMENT OF INCUMBENTS IN JOB GROUPS**  
Regulation pertinent to this portion of the AAP is 41 CFR § 60-2.13

Executive Order 11246 requires an annual analysis of all job groups at the university. The contractor must place all employees into a job group and state the percentage of minorities and women in each group. Placement goals must be established where availability is determined to be greater than the current percentage of women or minorities reported in each job group. In order to determine where placement goals are required it is first necessary to determine availability.

**AVAILABILITY ANALYSIS**  
Regulation pertinent to this portion of the AAP is 41 CFR § 60-2.14

Availability is determined by estimating the number of qualified minorities and women available for employment in a given job group by completing a two factor analysis; 1) the percentage of minorities or women with requisite skills in geographic areas where the university can reasonably recruit, and 2) the percentage of minorities or women among those promotable, transferable, and trainable within the organization. The estimate is expressed as a percentage of all qualified persons available for employment in the job group and is described specifically in the pertinent regulation 41 CFR § 60-2.14. The contractor is given the responsibility of weighting each of these factors to determine the importance to employment in every job group. The job group being examined and the primary occupational activities of each group determine reputable sources of availability. The contractor is required to use the most current and reliable statistical information available. The availability of faculty personnel in higher education is unique; therefore an explanation and determination must be made separate from non-instructional personnel. This must be done for both minorities and women.

In determining faculty availability in the university, careful consideration was given to the academic disciplines represented in the total faculty. Availability was considered by discipline and the numerical representation of each discipline weighed as part of the whole. University faculty are recruited nationally and currently represent universities conferring terminal degrees across the nation and from around the world.

The following sources were consulted for the determination of faculty and staff availability:

- ◆ Chronicle of Higher Education Report on Current Trends in Higher Education
- ◆ U.S. Department of Education, National Center for Educational Statistics
- ◆ U.S. Department of Labor, Bureau of Labor Statistics
- ◆ U.S. Official Census Data

With regard to faculty employment the factors have been evaluated in the following way:

**1. The availability of minorities or females having requisite skills in an area in which the contractor can reasonably recruit.**

This is the only relevant factor in determining the availability of women and minorities for faculty employment. The University of Kentucky recruits faculty on a national basis, making national employment and availability data the proper basis for comparison with university faculty employment. The University of Kentucky recruits faculty from a national pool of candidates with terminal degrees in the specific fields where there are available positions.

**Weight: -100-**

**2. The availability of promotable, transferable, and trainable minorities/females within the contractor's organization.**

At the University of Kentucky employees holding staff positions do not normally fill faculty positions. The University of Kentucky does not normally hire its own graduates for faculty positions. As a matter of educational policy the preference is to foster diversity of background in university faculty. Terminal degrees awarded by the University of Kentucky are recognized in national degree statistics.

**Weight: -0-**

The University of Kentucky exerts its best efforts to obtain current and accurate data concerning the availability of women and minorities for faculty positions. The analysis required by the federal regulations contains certain assumptions inapposite to academic appointments, namely, that faculty are employed from other categories of employees. There is, therefore, only one factor, which has any bearing in determination of faculty availability. This is the number or proportion of women or minorities in the workforce having the requisite credentials in an area of reasonable recruitment. In the main, new faculty are hired as assistant professors from the ranks of those recently conferred terminal degrees. Although there are occasional exceptions, these are so infrequent and so few that no significant changes in availability determination should be planned.

The analyses of the factors relevant to non-instructional staff have been evaluated in the following way:

**1. The availability of minorities/females having requisite skills in an area in which the contractor can reasonably recruit.**

The University of Kentucky weighs this factor for the recruitment of women and minorities in all staff job categories. The University necessitates a broad employment spectrum for the executive, administrative, managerial, and professional position categories, using national, regional and local searches. Recruitment for office and clerical, technical and paraprofessional, skilled crafts, and service and maintenance position categories has a more limited reasonable recruitment area, drawing primarily from the Lexington Metropolitan Service Area and the surrounding communities.

**Weight: - 0 to 75-** All staff positions

## **2. The availability of promotable, transferable, and trainable minorities/females within the contractor's organization.**

The University of Kentucky weighs this factor in all staff position categories. The promotion of employees in the executive job group is weighed less than those in administrative, managerial and professional exempt positions. Development of the University's human resources through affirmative actions is strategic to institutional success.

**Weight: - 0 to 75-** All staff positions

While the regulation assumption is somewhat more correct in staff than in faculty employment, the internal workforce is not generally the main pool for new employees for executive positions. It is accurate to say, as the individual weighing indicates, that there is more of an internal pool for other staff positions. The broad spectrum of positions and educational and experience requirements even within a job group makes any assumptions made with regard to a particular group subject to some exceptions. The outside availability of minorities and women is also tempered by the small number of positions filled in the executive, administrative, managerial categories in any annual plan year. In the main factors as discussed are the best indicators of availability for the job group, and the most reliable sources of staff employment data.

As previously detailed the analyses undertaken have been conducted for women, African-American, Hispanic and Asian faculty and staff to determine the availability where that information is available. In the job groups where the relevant recruitment area is local or regional, the American Indian/Alaskan Native, Pacific Islander/Native Hawaiian, and Multiple race showed minor availability and was not calculated. In faculty availability where recruitment is from a limited but national pool, the availability of African-Americans demonstrates a more significant variance from the assessed availability for all minorities. This dual availability and analysis are established to respond to the University of Kentucky's federal affirmative action commitments while being mindful of the commitments to the CPE Diversity Policy.

The availability analysis by job group for the University of Kentucky is included as AAP Appendix B .that can be found at [www.uky.edu/eo/federal-reporting](http://www.uky.edu/eo/federal-reporting).

### **COMPARING INCUMBANCY TO AVAILABILITY**

Regulations pertinent to this portion of the AAP are 41 CFR § 60-2.15

Having established availability using the factors as prescribed, placement goals are established in any job group where the percentage of women and minorities in the workforce falls below the expected availability. Utilization analysis is conducted and communicated to the President and his staff at least annually at the University of Kentucky. Areas with placement goals are communicated to these executive officers and Deans responsible for the organizational units and colleges of the University so affirmative action goals and efforts may be reevaluated in light of both federal and state commitments.

The University of Kentucky workforce is evaluated by six major organizational units and by each college.

The University of Kentucky has conducted availability analyses for females, African Americans, Hispanics, and Asians. If underutilization has occurred goals have been set for those job groups. If the availability in a recruitment area was less than one percent, an availability analysis was not conducted for that job group. Details of the University of Kentucky utilization analysis are included as AAP Appendix C which can be found at [www.uky.edu/eo/federal-reporting](http://www.uky.edu/eo/federal-reporting).

### **ESTABLISHMENT OF PLACEMENT GOALS**

Regulation pertinent to this portion of the AAP is 41 CFR § 60-2.16

Full utilization is defined, for the purposes of the University of Kentucky Affirmative Action Plan, as having the same representation in each job group as the calculated availability of women and all minorities, including African-Americans, Hispanics, and Asians in the area where each facility can reasonably expect to recruit. The University of Kentucky has established as its placement goal full utilization as demonstrated in the utilization analyses presented.

University and college utilization analyses are used as guides for administrators, charged with affirmative action program implementation, in developing strategies that may most effectively contribute to the successful attainment of the University of Kentucky goals.

The Department of Labor Office of Federal Contract Compliance Programs (OFCCP) requires an annual Affirmative Action Plan. The University of Kentucky acknowledges that full utilization may not be a realistic one-year goal and has established goals to coincide with the University of Kentucky 2015-2020 Strategic Plan as a five year goal. Full utilization of job groups where there is low turnover, no anticipated addition of positions or a reduction in force may take an extended period of time to achieve even when women and minorities are selected at optimal rates. OFCCP guidance tells us that goals should not be strict numerical tenets but rather guidelines directing good faith affirmative action efforts. All employment decisions must be made in a non-discriminatory manner. Set-aside programs for certain groups are illegal. Affirmative

action programs do not require employers to “hire a less qualified person in preference to a more qualified one.” 41 CFR § 60-2.16(4) The OFCCP also reminds us that quotas are illegal.

The University of Kentucky therefore establishes for itself a five-year goal of full utilization or continuous progress toward full utilization within five years and maintaining utilization in those job groups where it has previously been achieved. The University of Kentucky Strategic Plan, approved by the Board of Trustees, established as strategic objectives to be realized by 2020. Goal 3 of the five major strategic plan goals states the University will *Enhance Diversity and Inclusivity* as follows:

- ❖ Foster a diverse community of engaged students;
- ❖ Improve workforce diversity and inclusion;
- ❖ Engage diverse worldviews and perspectives by increasing awareness of diversity and by communications across campus that address these issues.

## **ESTABLISHMENT OF RESPONSIBILITIES FOR IMPLEMENTATION OF THE AFFIRMATIVE ACTION PROGRAM**

Regulations pertinent to this portion of the AAP are 41 CFR§ 60-2.17(a)

The responsibility for directing the University policies in employment, as in many other areas, has been assigned to the President of the University by the Board of Trustees. The Associate Vice President for Institutional Equity has been designated, by the President, responsibility for the oversight and administration of all the University of Kentucky's equal opportunity commitments. The Associate Vice President for Institutional Equity is the University officer responsible for overseeing the development of the University of Kentucky Affirmative Action Plan and recommending policies and procedures for implementation. This designation of responsibility includes all equal opportunity commitments for the University of Kentucky. This charge addresses faculty, staff, and student concerns and necessarily transcends department and college boundaries.

The specific responsibilities of the Associate Vice President for Institutional Equity may include, but are not limited to, the following:

- ❖ Develop and review policy with regard to equal opportunity compliance
- ❖ Implement the Affirmative Action Plan
- ❖ Advise University personnel of the requirements of federal and state regulations
- ❖ Report to the President on the progress related to the University of Kentucky's commitments to equal opportunity including the Affirmative Action Plan.
- ❖ Facilitate a regular presentation and dialogue with the President's staff regarding affirmative action goals, goal-setting and equal opportunity issues
- ❖ Keep abreast of the legal decisions and legislative changes, both state and federal, affecting the University of Kentucky's affirmative action / equal opportunity responsibilities
- ❖ Keep abreast of regulatory changes and guidance statements from federal and state agencies
- ❖ Recommend changes in University of Kentucky policy and procedure in light of changing legal and regulatory compliance requirements
- ❖ Develop and offer training on the University of Kentucky's equal opportunity and nondiscrimination policy and related federal and state statutes
- ❖ Serve as the University of Kentucky Americans with Disabilities Act Compliance Coordinator
- ❖ Serve as the University of Kentucky Title IX Compliance Coordinator
- ❖ Help administrators identify qualified employees with disabilities and appropriate accommodations
- ❖ Convene ad hoc accommodation appeal committees as required
- ❖ Serve on University, college and departmental equal opportunity and diversity committees
- ❖ Work in conjunction with the Vice President for Institutional Diversity on University diversity objectives

- ❖ Serve as liaison and respondent between the University and federal and state enforcement agencies
- ❖ Develop internal and external communication techniques to disseminate University equal opportunity policy
- ❖ Assists administrators to identify potential problem areas, solutions and preventative techniques
- ❖ Respond to concerns from faculty, staff and students regarding alleged violations of university non-discrimination policy, and work closely with other university officials receiving such concerns to assure appropriate response, investigation and resolution
- ❖ Design and implement an audit and reporting system to measure the effectiveness of the University affirmative action / equal opportunity programs
- ❖ Serve as counselor to employees regarding work-related equal opportunity matters
- ❖ All other institutional appointments and assignments as requested.

The University has provided support for the implementation of University of Kentucky equal opportunity commitments. Since 1996, a professional position provides education, coordination and oversight of technical compliance for the affirmative action / equal opportunity programs at the University of Kentucky as well as develops the affirmative action plan annually. This position responds to inquiries and trains University personnel in regulatory compliance issues.

### **The Equal Opportunity Committee**

The Equal Opportunity Committee is an administrative standing committee of the University of Kentucky, which is appointed to advise the President or other University officers regarding the provision of equal opportunity. The charge to the committee, found at Administrative Regulation 3:12, states:

The Equal Opportunity Committee provides advice on all University-wide matters of equal opportunity. The Committee is appointed by the President of the University of Kentucky and reports to the Executive Vice President for Finance and Administration. Committee membership shall be comprised of representatives from faculty, staff, and students. The chair and ex officio members shall be designated by the President.

The committee members, other than those with student or ex officio status, normally shall have staggered three-year appointments. Students normally have one-year appointments. Members may be reappointed to the committee.

The specific responsibilities of the Equal Opportunity Committee include:

1. Monitoring plans and programs that ensure equal opportunity throughout the University;

2. Facilitating the development and implementation of diversity perspectives in all student, workforce, and University affairs;
3. Recommending processes to assist University officials in exercising their responsibility to ensure equal opportunity and a supportive campus environment; and
4. Assessing provision of equal opportunities throughout the University and fostering an environment of inclusiveness.

The Committee shall prepare an annual report to the Executive Vice President for Finance and Administration.

### **Office of the Vice President for Institutional Diversity**

The Office of the Vice President for Institutional Diversity (VPID), founded in July 2008 as part of the University's endeavor to promote diversity and inclusion, is responsible for promoting collaboration among faculty, staff, administration and students in earnest pursuit of UK's diversity goals. Institutional Diversity strives to offer a welcoming and nurturing environment where all students, faculty, staff, and visitors can realize their full potential. The VPID also advises the President and Provost on all academic, fiscal and administrative policy decisions regarding the University's diversity goals; with developing, implementing and evaluating the university's diversity plan; and with active community involvement around diversity issues. Several units within the Office for Institutional Diversity focus on student retention, development, and graduation:

- ❖ Center for Academic Resources and Enrichment Services (CARES) provides a comprehensive academic support system and enrichment services to aid in increasing the retention and graduation rates of underrepresented students. Programs and activities assist students in achieving academic excellence and adjusting to student life at the University of Kentucky.
- ❖ Center for Graduate and Professional Diversity Initiatives, formerly Health Colleges Student Diversity Services, recruits and retains underrepresented students in graduate and professional programs; aids in the cultural diversity development of all students, faculty and staff.
- ❖ Martin Luther King Center (MLKC) supports the University's diversity goals by developing and offering programs and experiences designed to prepare all students for the social, cultural and political challenges of an increasingly complex multicultural, global community. MLKC guiding philosophy is grounded in the conviction that the development of self-knowledge and cultural competence based on an enlightened worldview is a vital dimension to becoming a genuinely educated person. Likewise, educated people should be knowledgeable about and sensitive to the cultural essence of other peoples.

- ❖ Student Support Services (SSS) is a federally funded TRIO program designed to provide support services to improve academic performance and increase retention, matriculation and graduation rates of college students who are first generation (neither parent had a bachelor's degree), low income or have a documented disability. SSS serves to motivate and support students as they transition from one level of education to the next while working toward the successful completion of their postsecondary education.
- ❖ Office of LGBTQ\* Resources is the central hub for accessing information, groups and services related to diverse sexualities and gender identities, and serves all students, faculty and staff at the University. The Office of LGBTQ\* Resources also seeks to connect and collaborate with LGBTQ\* community groups and friends across Lexington and the Commonwealth of Kentucky. The office's work generally focuses on three core pillars: community building, education, and advocacy. The Office works with other units across the University to assist in the development of effective approaches to increasing diversity and strengthening inclusion to enhance the campus as a welcoming environment.
- ❖ Bias Incident Support Services (BISS) exists to provide support and advocacy for any student, staff, or faculty member impacted by bias, hatred, and/or an act of identity-based violence. BISS also provides education, training and consultation services to any University entity interested in working to nurture a sense of belonging within their college, divisions, office. Bias Incident Response Team (BIRT) is the University's official system for reporting acts of bias, hatred, and identity based violence.

## IDENTIFICATION OF PROBLEM AREAS

Regulations pertinent to this portion of the AAP are 41 CFR§ 60-2.17(b)

As part of the University of Kentucky affirmative action program a thorough analysis is conducted for the reporting year preceding the effective date of this plan. Careful ongoing consideration is given to changing legislation and regulations, agency guidance, and legal precedent in determining the direction of the University's employment goals and action-oriented programs. In recent years the University has experienced mandated state general fund budget reductions and still upheld primary focus on employment of women and minorities. Following are the issues identified and evaluated to foster provision of equal opportunity throughout the University of Kentucky:

- ❖ The composition of the workforce by sex and minority status is completed annually as detailed in the utilization analysis. A detailed discussion of the University of Kentucky total workforce analysis may be found for the University of Kentucky at AAP Appendix D at [www.uky.edu/eo/federal-reporting](http://www.uky.edu/eo/federal-reporting).
- ❖ The applicant flow and ratio analysis by sex and minority status is completed annually, in accordance with regulatory guidance, in an effort to determine if significantly different hiring rates occur for women or minorities in any job group. This analysis for the University of Kentucky, six major organizational units, and each college may be found for the University of Kentucky at AAP Appendix E at [www.uky.edu/eo/federal-reporting](http://www.uky.edu/eo/federal-reporting).
- ❖ Regular review is conducted to determine if significantly higher numbers of women or minorities are being adversely affected in the employment processes, including promotions. A detailed discussion of the applicant flow analysis for the University of Kentucky may be found for the University of Kentucky at AAP Appendix F at [www.uky.edu/eo/federal-reporting](http://www.uky.edu/eo/federal-reporting).
- ❖ A ratio analysis by sex and minority status is completed annually, in accordance with regulatory guidance, in an effort to determine if significantly different termination rates occur for women or minorities in any job group. This analysis for the University of Kentucky, six major organizational units, and each college may be found for the University of Kentucky at AAP Appendix G at [www.uky.edu/eo/federal-reporting](http://www.uky.edu/eo/federal-reporting).
- ❖ Regular review is conducted to determine if significantly higher numbers of women or minorities terminate employment. This analysis may be found for the University of Kentucky at AAP Appendix H at [www.uky.edu/eo/federal-reporting](http://www.uky.edu/eo/federal-reporting).
- ❖ The selection process for faculty at the University of Kentucky is detailed in the [Governing Regulations Part X.B](#) and is procedurally distinct from staff employment. The Provost and deans are delegated responsibility for faculty employment. The deans are delegated authority to approve faculty appointments below the rank of associate professor. The approval authority set out in the procedures for the appointment, promotion, granting of tenure, and termination is contained in [Administrative Regulation 2: Academic Appointment](#) (Faculty).

- ❖ The requirements for the retention of records, pertaining to the employment of faculty, are communicated to college administrators.
- ❖ The Office of Institutional Equity and Equal Opportunity Technical Compliance Officer is available to all colleges for consultation on the recommended hiring process and guidance on the affirmative action program before and during new faculty or staff searches.
- ❖ Human Resources policy and procedures at the University of Kentucky are continually evaluated. Examined are employment, performance evaluation, job classification, and compensation systems for regular staff positions. Included in this ongoing effort was the development of a job analysis questionnaire to describe positions and the development of a University wide philosophy of performance management. All positions are reviewed for appropriate placement in the compensation structure. It is the intent of the University of Kentucky to attract and retain qualified employees by maintaining a compensation system that is both externally competitive and internally consistent.
- ❖ The Office of Institutional Equity and Equal Opportunity provides regular training for Human Resource's Employment personnel on the affirmative action program including the results of ongoing analyses.
- ❖ All facilities, programs, services, and benefits at the University of Kentucky are made available without regard to protected group status consistent with stated policy.
- ❖ Training programs are made available to all employees for professional and skill development. These are advertised widely and utilized by significant numbers of women, minorities, protected veterans, and persons with disabilities.
- ❖ The University of Kentucky policies on equal opportunity are communicated in ways designed to reach all employees and others in the wider community.
- ❖ The EEO policy poster is displayed in a prominent and accessible location in the Human Resources office.
- ❖ The University of Kentucky's equal opportunity policy is displayed on bulletin boards, in various buildings, across campus.
- ❖ Notification of the location of an accessible copy of the University of Kentucky's Affirmative Action Plan is displayed on bulletin boards, in various buildings, across campus.
- ❖ Notification of the University of Kentucky's policy and obligations under Executive Order 11246 are included on all contracts and agreements entered into with subcontractors and suppliers.
- ❖ The University of Kentucky's affirmative action program is regularly evaluated and reports are made to the President and other administrators on its effectiveness and the progress toward established goals.
- ❖ The University of Kentucky is a recognized equal opportunity employer in the community.
- ❖ The University of Kentucky is located in an urban county area where the availability of accessible housing is not believed to be a detriment to the employment of either women or minorities.

- ❖ The University of Kentucky is readily accessible by public transportation from the Lexington/Fayette County area. This transportation is available regularly and is accessible to persons with disabilities.
- ❖ The University of Kentucky asserts in good faith that de facto segregation does not exist at the University of Kentucky.

## **DEVELOPMENT AND EXECUTION OF ACTION ORIENTED PROGRAMS**

Regulations pertinent to this portion of the AAP are 41 CFR§ 60-2.17(c)

The University of Kentucky affirmatively supports its equal opportunity policies. To encourage action oriented programming:

- ❖ Details of the utilization analysis for staff and faculty in each organizational unit and college are distributed to the administrator responsible for the implementation of its affirmative action program with the objective that action-oriented programs are established that contribute to the University's goal of full utilization.
- ❖ Details of the applicant flow and ratio analysis are communicated to Human Resource's Employment personnel with the objective that they, with hiring officials, develop recruitment of representative pool action plans designed to impact applicant flow where a need has been identified.
- ❖ The Office of Institutional Equity and Equal Opportunity will examine any job group where either adverse ratio analysis and/or underutilization occur. Meetings may be scheduled with appropriate organizational units or colleges to discuss applicable affirmative action.
- ❖ The Office of Institutional Equity and Equal Opportunity will evaluate terminations to determine if adverse impact exists based on sex or minority status. Further analysis will be completed as necessary to ensure equal opportunity compliance.
- ❖ Each college is given the objective to evaluate its faculty utilization and action-oriented programs in order to contribute to the University's goal of full utilization and the diversification of its educational programs.
- ❖ As of July 2015 each college began posting all full-time faculty positions on the University's integrated employment system for more consistent demographic data collection.
- ❖ Search committees are encouraged to consult with the technical compliance officer for guidance on the University's affirmative action program before initiating a search.
- ❖ The Office of Institutional Equity and Equal Opportunity monitors on an ongoing basis employment and compensation processes and new policy developments to ensure equal opportunity compliance.
- ❖ The Office of Institutional Equity and Equal Opportunity is available to meet with search committees, search firms, hiring officials, and academic and administrative units requesting additional information on the University of Kentucky's goals and equal opportunity commitments.
- ❖ The Office of Institutional Equity and Equal Opportunity participates in new faculty and staff orientations at the beginning and throughout each academic year to acquaint new employees to the benefits of our office and outreach.
- ❖ The Office of Institutional Equity and Equal Opportunity provides Discrimination and Harassment training to all new supervisors through SuperVision.

- ❖ Training and outreach on all the University of Kentucky equal opportunity commitments are available by contacting the Institutional Equity and Equal Opportunity Office or visiting the website at [www.uky.edu/eoo/training](http://www.uky.edu/eoo/training). This office is responsible for advising University officials and discussing ways to affirmatively impact UK's goals.
- ❖ The Office of Institutional Diversity provides University representation and special reports to the CPE Committee on Equal Opportunities (CEO) that monitors the University's compliance with CPE Diversity Policy student enrollment, student success, workforce and campus climate objectives.
- ❖ The Associate Vice President for Institutional Equity and Vice President for Institutional Diversity meet quarterly with each UK HealthCare executive leader to review initiatives and progress made in achievement of UK HealthCare "Diversity and Inclusivity: Enterprise Goal.
- ❖ UK Policy and Procedures are examined on a regular basis with regulatory guidance from the U.S. Department of Labor Office of Federal Contract Compliance Programs (OFCCP), the Uniform Employee Selection Guidelines, other enforcement agency guidance, and Human Resources to ensure the University of Kentucky in practice and spirit is an inclusive employer, without disparate impact of any protected group or affiliation.

The Vice President for Human Resources and specifically the HR Employment Office proactively collaborates with hiring departments across the university to educate, guide, and ensure applicant pools have a diverse candidate representation including minorities, females, veterans, and individuals with disabilities.

### **Education & Training**

- ❖ The Hiring Enhancement Program, established in January 2009, continues to provide training, resources and tools for hiring officials. The program is intended to educate hiring officials on effective and legally credible hiring practices. A variety of trainings are offered annually which include: Legal Considerations -- The Dos & Don'ts of Interview Questions; How to Develop an Effective Job Posting; Behavior Based Interviewing Series; and UK's Hiring Fundamentals and Interviewing Techniques. A couple of new trainings have been added in support of the University-wide Unconscious Bias initiative. As of July of 2016 training on Unconscious Bias for Faculty Search Committees is now offered and as of March of 2017, training for UK Healthcare leaders on Mitigating Bias in the Hiring and Selection Process is offered by request, both designed to complement the University-wide Unconscious Bias training. The HR Employment Office also conducts the interviewing and selecting portion of the University's SuperVision course offered on a regular basis to all new supervisors. This program has four dedicated Employment Consultants that offer multiple customized resources including: behavior based interview guides (phone, in-person and/or reference checks); department consultations; and trainings. A website has been

developed to provide hiring and selection tools to hiring officials wherever they are in the hiring process.

### **Employment Advertising Improvements**

❖ In 2015, Graystone Group Advertising services were acquired through the University procurement process (RFP) to enhance UK's employment branding and effective advertising capabilities through heightened exposure and visibility. The contract terms are February 1, 2015 through January 31, 2017 with renewal options thru 2020. Graystone provides options that target specific advertising needs for requested employment searches with the goal of increasing the diversity and qualifications of each applicant pool. To assist in meeting the Office of Federal Contract Compliance Program reporting and outreach requirements, the HR Employment Office purchased a variety of targeted job boards to advertise staff and faculty positions. These job boards include: InsideHigherEdJobs.com, HigherEdJobs.com, Diverse Issues in Higher Education, Academic Keys, Latinos in Higher Education, The Chronicle of Higher Education, Hospital Careers, and JobTarget's OneClick recruitment platform. JobTarget posts positions to Kentucky's state job (Kentucky Focus Talent) board as well as a vast network of job boards which include:

- VetJobs ([www.vetjobs.com](http://www.vetjobs.com))
- Veterans Enterprise ([www.VeteransEnterprise.com](http://www.VeteransEnterprise.com) )
- Hire Our Heroes ([www.hireourheros.org](http://www.hireourheros.org))
- JOFDAV – Job Opportunities for Disabled American Veterans ([www.jofdav.com](http://www.jofdav.com))
- Disabled Person ([www.disabledperson.com](http://www.disabledperson.com))
- The Black Perspective ([www.blackperspective.com](http://www.blackperspective.com))
- Hispanic Today ([www.hispanic-today.com](http://www.hispanic-today.com))
- Women in Business & Industry ([www.wib-i.com](http://www.wib-i.com))
- Women For Hire ([www.womenforhire.com](http://www.womenforhire.com))
- EMPLOYDIVERSITY ([www.employdiversity.com](http://www.employdiversity.com))
- US Military PIPELINE ([www.usmilitarypipeline.com](http://www.usmilitarypipeline.com))

Each job board will automatically upload positions from the UK Jobs website daily allowing UK to reach a broader applicant audience. The University of Kentucky has a dedicated profile on InsideHigher.com and HigherEdJobs.com job boards to provide additional information on the University's mission and vision as well as details on living in Lexington and the Bluegrass Region. In addition to the unlimited postings on HigherEdJobs.com, the HR Employment Office purchased Affirmative Action (AA) e-mails that can be utilized with designated job postings. When an AA e-mail is used, an e-mail will be sent to approximately 250,000 job seekers featuring the job posting along with other postings from universities who are actively recruiting candidates in accordance with affirmative action or diversity plans.

The HR Employment Office also purchased, created and strategically placed diversity and inclusion ads in the following media sources: Diverse Issues in Higher Education, Hispanic Outlook in Higher

Education, Minority Nurse and Diversity in Academe, a joint publication of The Chronicle of Higher Education. These advertisements will be published between fall 2017 through spring 2018. Additionally, the HR Employment staff routinely encourages hiring officials to participate in broader employment advertising for positions in a job category which is underrepresented in minorities and/or females. HR routinely coordinate targeted advertising research for interested departments to provide a cost analysis as well as suggested niche site advertising options for hard-to-fill positions.

To continue to support the Human Resources' and the Universities' strategic plan, HR Employment updated the online employment system to include the University's commitment to a community of inclusion and equal employment. This enhanced verbiage highlights dedication to a diverse and inclusive workforce for all students, faculty, and staff working in an environment of openness and acceptance.

### **Summer Youth Program**

- ❖ The HR Employment Office coordinates a six week program which is designed to expose high school students with diversity backgrounds to the academic and work environment at the University of Kentucky. Financial support is provided by the Office of the President for the annual program, which allows 10 students to work in UK departments over the summer to gain valuable work readiness skills. The program began in 2001 and continues to be a valuable opportunity for UK staff to support the Lexington community by coaching and developing assigned Summer Youth employees. During the six weeks there are several training classes for the students to improve their customer service skills and learn general business etiquette as well as application and interview techniques. Due to the popularity of the Summer Youth Program, the application process has become more intensive with an evaluation panel choosing which students to participate. The program continues to be a successful employer and student recruitment tool. During the past fifteen years, over 150 youth have participated with many continuing to work or attending classes at UK after the program ends.

### **Supportive Work Environment**

- ❖ The Human Resources *Office of Work-life* leads efforts to recognize the diverse professional and personal needs of employees, and enables the University to better adapt to a changing workforce and address operational needs. The Office of Work-Life advocates for and/or provides resources on the following: flextime, telework, childcare, lactation support, mental health counseling at no-cost to employees, caring for an aging parent or relative, and much more. A few highlighted offerings include:
  - ◆ Elder Care: This resource center provides support for employees caring for an aging parent or relative. Through individual consultations, referrals, resource guides, caregiver support groups,

and seminars on everything from ‘understanding Medicaid’ to “types of housing for seniors,” the Elder Care specialists provides employees with needed assistance. Visit <http://www.uky.edu/HR/ElderCare> for more information.

- ◆ Work+Life Connections: This voluntary counseling and referral service is at no-cost to employees, their spouses, children and sponsored dependents. Two licensed clinical social workers are available to help individuals dealing with issues such as depression, anxiety, grief, divorce, parenting, substance abuse and stress at work or home. Work+Life Connections also provides training for supervisors, support groups, seminars, and community referrals for basic needs. Visit <http://www.uky.edu/HR/WLC/welcome.html> for more information.
- ◆ Reduced Seasonal Hours Program offers an alternative flexible schedule to regular, full-time employees who would like to reduce the number of hours they work each week during the winter or summer months. <http://www.uky.edu/HR/WorkLife/ReducedSeasonalHours.html>
- ◆ Child Care: The University of Kentucky has three high-quality childcare centers on or adjacent to campus: Child Development Center of the Bluegrass, Woodland Early Learning Center, and Early Childhood Laboratory. The Office of Work Life also provides individual consultations, workshops, and support groups to parents. Learn more about these centers and back-up childcare options by visiting <http://www.uky.edu/hr/work-life/resources-for-parents>
- ◆ Lactation Resources: The Office of Work Life provides lactation resources and mother’s rooms across campus to encourage and support mothers who choose to breastfeed after returning to work. [http://www.uky.edu/HR/WorkLife/Lactation\\_Breastfeeding.html](http://www.uky.edu/HR/WorkLife/Lactation_Breastfeeding.html)

The University of Kentucky has established action-oriented programs to recruit, retain, and promote the best-qualified faculty, staff, and students, especially women and minorities. Colleges develop individual strategies specific to their disciplines while other initiatives are employed more widely across disciplines. For the purpose of the Affirmative Action Plan this detailing will be separated into faculty and staff initiatives but should not be considered an exhaustive list. The University of Kentucky provides individual colleges with direction and support in their recruiting efforts for qualified minority and women candidates, especially in disciplines where women or minorities have traditionally been underrepresented. Recruiting faculty is an important but limited first step. Developing and promoting excellent instructional and research faculty are integral parts of the programs developed for the successful research institution. Some of the action-oriented programs being employed by the University of Kentucky to recruit, retain, and promote the best qualified instructional and research faculty are:

- ❖ Postdoctoral diversity fellowship funds are available through the Office of the Vice President for Research that give consideration to minorities and women in under-represented professions.
- ❖ UK participates in the Southern Regional Education Board Doctoral Scholars Program to encourage minorities in doctoral programs.
- ❖ Faculty mentoring and collaboration by established researchers.

- ❖ Regular meetings with untenured faculty to discuss promotion and tenure issues.
- ❖ Taking advantage of special hiring opportunities when they appear, utilizing funds made available by the President and the Provost for such opportunities.
- ❖ Active participation in national professional organizations designed to recruit women and minorities to faculty positions in underrepresented professions.
- ❖ Making available when possible professional development and travel funds for junior faculty.
- ❖ Financially supporting when possible a professional meeting each year.
- ❖ The utilization of personal contacts, professional web sites, and national meetings for recruitment.
- ❖ The Center for the Enhancement of Learning and Teaching fosters excellence in education throughout the University of Kentucky by providing academic support services for faculty that enhance student learning, promote scholarship, and facilitate teaching innovations. Through workshops, conferences, lectures, and individual consultations the Center has become a support unit for both new and experienced faculty.
- ❖ Faculty recruiting activities include meeting with faculty being recruited to discuss both internal and external research opportunities at UK.
- ❖ Faculty orientation includes meeting with minority faculty to discuss research and creative activities and provide support when possible.
- ❖ Office for Faculty Advancement manages the Dual Career Partners Services Program that connects incoming UK faculty with employment and relocation professionals to assist in the transition, tips on how to search for UK jobs, information about potential employers in the area, and related guidance and support.
- ❖ Providing support to minority faculty through individual consultations and workshops.
- ❖ The Women's Leadership Task Force helps identify career and development opportunities for women faculty and executive staff, promotes visibility and acknowledgement of women's contributions, and creates an understanding of the status of women on campus.
- ❖ A university-wide committee coordinates programs in the university's efforts toward inclusive learning; promotes positive inter-campus relations across diverse groups; and offers mediation services during incidents of intolerance.
- ❖ Colleges participate in the Medical Center Women's Health Initiative that, open to all applicants, provides role models for University and community women and opportunities for women faculty to conduct scholarly activities that enhance their professional development. There are several development activities for faculty: The American Association of Dental Schools summer faculty development program, the Executive Leadership in Academic Medicine (ELAM) program, and the American Association of Dental Schools annual program on recruitment and retention of faculty.
- ❖ Community-based faculty serve as mentors, role models and teachers for all health-professional students

- ❖ Active campaigns have been conducted to recruit individuals to the campus including advertisement in various publications, targeted mailings, numerous phone calls, and recruitment at national meetings.
- ❖ UK HealthCare Diversity and Inclusivity Enterprise Council provides strategic cultural alignment for patient centered care and leveraging a diverse and inclusive workforce to achieve superior results.

The recruitment and professional development for staff employees is encouraged at the institutional level with opportunities offered for all staff employees and more specific opportunities offered within the specific departments of the University. Many staff development opportunities serve as recruitment tools for the University of Kentucky, offering educational and professional development opportunities in conjunction with employment and benefits. Other recruitment strategies are implemented by the hiring official and the Employment Specialists when the recruitment action plan is determined as outlined by the employment policy. Options may include advertising in specific publications, locally or to a broader audience. Recruitment action plans may be developed based on the type of position being filled and the expected qualified internal applicants. Employment Specialists are aware of areas of underutilization and are expected, as outlined by policy, to send hiring officials representative pools of applicants for consideration. All open staff positions are available to employees and the public on the online employment system at <https://ukjobs.uky.edu/>. Employment opportunities at UK now may be accessed from computers at homes, state agencies, public libraries, and UK Cooperative Extension Services county offices across Kentucky. Applications may be completed and other documents electronically attached from computers around the world.

Staff development opportunities are available to all employees without regard for membership in any protected group consistent with University of Kentucky policy. While initially intended for staff development, it should be noted that the following programs are also open to faculty where beneficial. The programs available to all employees are as listed:

- ❖ The Humanity Academy is a week long program aimed at University of Kentucky members who are willing to become change agents within the campus community. These individuals will champion the University's diversity goals and will be responsible to establish a culture of respect, inclusion, and appreciation for all staff, faculty, and students.
- ❖ Training on Discrimination and Harassment, the Americans with Disabilities Act, the University of Kentucky Affirmative Action Plan, Title IX Compliance, and other sessions on the provisions of equal opportunity at the University of Kentucky are available on-line and through the Office of Institutional Equity and Equal Opportunity for faculty, staff, and student audiences.
- ❖ SuperVision, offered through Human Resource Development (HRD), is a workshop aimed at new supervisors and open to all existing supervisors at UK. The curriculum is designed to address

supervisory issues such as workplace communication, performance evaluation, conflict resolution, interviewing and selecting employees, and documentation of discipline. University policies are reviewed and equal opportunity issues are addressed.

- ❖ The Essential Leader program consists of 80 hours over a two-year period that is offered by HRD and created specifically for employees who want to become better leaders and learn key leadership skills.
- ❖ eTraining & Development is UK's online technology training system available to staff, faculty, and students at no charge at [www.uky.edu](http://www.uky.edu). The courses provide technology training to enhance individual technical skill development.
- ❖ Basic Computer Instruction is offered for employees seeking basic computer literacy training.
- ❖ Resume/Application assistance, career assessments and interview coaching is offered through HRD Career Development for employees seeking to update or prepare resumes for UK's Employment Services.
- ❖ Assistance is offered onsite at the UK Employment Office Computer Lab for employees to review and apply for employment opportunities advertised on-line through UK's Online Employment System.
- ❖ The University of Kentucky offers the opportunity to continue in higher education through its Employee Educational Assistance program. The University of Kentucky will provide each employee up to eighteen credit hours of tuition assistance per year. This allows employees to complete desired degrees ranging from associate degrees at Bluegrass Community and Technical College to terminal doctoral degrees at the University of Kentucky. Employees may take up to eighteen credit hours annually tuition free at the University of Kentucky or any other public postsecondary education institution in Kentucky.
- ❖ The University of Kentucky with the Southern Association of College and University Business Officers (SACUBO) offers the College Business Management Institute at the UK campus each summer. This three-year institute attracts hundreds of business staff from colleges and universities nationally and abroad. UK employees are eligible to participate and some scholarship opportunities are available.

Opportunities for staff are also made available through individual departments. Various contributions are made by auxiliary departments making opportunities accessible to staff. Some of those include, but are by no means limited to, the following:

- ❖ Teleconferences and other one-time speakers and programs are made available for faculty, staff, and students by different organizations and on a variety of topics as part of the ongoing educational environment at a major research university. Many of these events are offered at no charge, others with very nominal admission charges. Staff employees may be sent from departments or may be

invited to attend events specific to their areas of expertise or responsibility. All staff employees are encouraged to take advantage of as many offerings as possible for professional and personal enrichment.

- ❖ Job families, where applicable, have been developed with a specific process and criteria for promotion.
- ❖ Areas identify flex-time, altered schedules, telecommuting and other options allowing employees to meet personal and professional development needs while still assuring that the work of the unit is completed.
- ❖ Parking and Transportation Services makes available accessible parking and bus transportation for faculty, staff, and students. This allows access to the many professional development activities available on campus that may otherwise be unavailable to individuals with disabilities.
- ❖ Staff employees were surveyed to determine their interests in various professional development courses.
- ❖ Participation in regular campus offerings, campus seminars, and teleconferences is encouraged. A regular series of staff development programs are offered to both professional and support staff.
- ❖ International Center has developed international programs encouraging staff participation and enhancing staff knowledge of the world.
- ❖ Decisions are made in each department and approved by the dean for travel and professional development opportunities beyond UK.
- ❖ The Physical Plant Division, both in healthcare and on main campus, encourages employee development and promotion by offering on-site training and supporting employees' off-site training.
- ❖ The Disability Resource Center offers in-service training and consultation as requested regarding disability and accessibility issues so that quality educational and occupational opportunities are available for everyone.

The University of Kentucky's affirmative action program as described, under the regulatory guidance of the Department of Labor Office of Federal Contract Compliance Programs (OFCCP), includes all full-time and part-time employees including the employees of the College of Agriculture, Food and Environment Cooperative Extension Service (CES). These employees also are included in the affirmative action program required and monitored under the auspices of the U.S. Department of Agriculture.

The Cooperative Extension Service serves as a link between the counties of the Commonwealth and the University of Kentucky. An off-campus branch of the College of Agriculture, Food and Environment, the CES conducts educational programs in each of Kentucky's 120 counties. The CES is committed to building a more diverse workforce and to ensuring its programs are available to all citizens. Action steps by the CES in this area include:

- ❖ A Diversity Advisory Committee meets quarterly to review progress made in achieving a more diverse applicant pool and the hiring of a more diverse staff. The committee also reviews training materials for staff and contributed to the writing of the State Affirmative Action Plan.
- ❖ A Diversity Network was established to serve and support extension professionals with diverse backgrounds as they work to meet the needs of Extension clientele. The Network's efforts are focused on:
  - ◆ Increasing the recruitment and retention of extension professionals from diverse backgrounds
  - ◆ Providing programs and activities that enhance professional development
  - ◆ Supporting social interactions among members
  - ◆ Increasing awareness of Cooperative Extension employment opportunities among individuals from diverse backgrounds.
- ❖ An intern program provides on average 47 college students with a twelve-week placement in a County Extension Office during the summer. Interns learn about Extension as a career through this experience.
- ❖ An Agent-at-Large program that retains minorities and others that finish academic programs until an extension position becomes available to apply. Three have been hired in the last three years.
- ❖ Diversity in programming is recognized each year by the Cooperative Extension Diversity Award. Award recipients receive cash awards to put into future programming (\$1000.00 team, \$500.00 individual).
- ❖ Each county annually updates an Affirmative Action Plan in conjunction with development of the plan of work. The plans include an evaluation of present audiences reached and goals to reach underserved audiences. How well staff meet affirmative action goals is a factor considered in performance appraisals.
- ❖ UK Extension professionals host and Co-Chair the annual National Land-Grant Diversity Conference and Pre-Conference with Extension Professionals from Kentucky State University, Purdue University, Central State University, and Ohio State University. Nearly 100 UK Extension agents attend annually along with professionals from other states to increase their knowledge of how to reach diverse audiences.
- ❖ Kentucky Extension Service arranged a team of extension leaders to conduct a review of county programs every five years to ensure the programs are following a plan of work and reaching all constituents of each 120 counties. Kentucky Extension compiled a team of extension professionals to conduct a Civil Rights/Diversity Training for all 120 counties.
- ❖ UK Extension placed four representatives as an advisor on the College of Agriculture, Food and Environment student organization Minorities in Agriculture, Natural Resources, and Related Sciences (MANRRS) to mentor and work with students and encourage them to apply for extension internships and opportunities.

- ❖ UK Extension has representatives that serves on Minorities in Agriculture, Natural Resources, and Related Sciences (MANRRS) National Officer Team as National Graduate Student Officers.
- ❖ CES has arranged a team of agents and administrators to conduct diversity/civil rights trainings in each of the seven CES districts every three years. As of 2014, all counties have been trained directly with mandatory online modules released in the Fall of 2014.
- ❖ CES has included a diversity representative (Assistant Dean and Director for Diversity) in the hiring of administrator and agent positions.
- ❖ CES has contributed staff and resources in the implementation and planning of a statewide Pre-college diversity outreach program through 4-H and Jr. MANRRS. Jr. MANNRS is a program that targets middle school and high school youth and introduces traditionally underserved and under-represented youth to extension and the College of Agriculture, Food and Environment. In 2016, 250 participants attended the conference that is in its 5th year up from 238 in 2015.
- ❖ CES Assistant Director for Human Resources holds the position of National Jr. MANRRS conference chair.
- ❖ CES has an annual Cultural Understanding workshop for its new employees at Core Training.
- ❖ CES has a diversity update/presentation as a component of its new employee agent orientation.
- ❖ CES 4-H and Youth Development has created a Diversity/Inclusive Committee to look at curriculum and address needs of diverse youth.

## DESIGN AND IMPLEMENTATION OF INTERNAL AUDIT AND REPORTING SYSTEM

Regulations pertinent to this portion of the AAP are 41 CFR§ 60-2.17(d).

The Office of Institutional Equity and Equal Opportunity at the University of Kentucky has the responsibility of auditing and reporting on the effectiveness of the affirmative action program. The following procedures are in place for the University of Kentucky to monitor the program, measure its effectiveness, and report to the University:

- ❖ Responsibility for the maintenance of employment records on non-instructional staff positions is assigned to the Vice President and Chief Human Resources Officer. Accurate records of all employment actions must be maintained. This information includes gender, minority, disability, and VETS status when voluntarily self-disclosed by the applicant for employment. Reports detailing employment activity by gender, minority, disability, and VETS status including applicants, hires and promotions are reviewed and provided to the Office of Institutional Equity and Equal Opportunity for analysis. 41 CFR § 60-2.17(d)(1)
- ❖ Ad hoc reports may be requested from the University of Kentucky Human Resource System through SAP administrative system as needed for analysis. 41 CFR § 60-2.17(d)(2)
- ❖ The academic departments within each college maintain faculty employment records. 41 CFR § 60-2.17(d)(2)
- ❖ As of July 1, 2015 colleges began posting all full-time faculty position through the University of Kentucky's Integrated Employment System. With this change more accurate reporting data for gender, race, protected veterans and individuals with disabilities data can be collected for faculty positions. 41 CFR § 60-2.17(d)(1)
- ❖ The University of Kentucky Information Technology Enterprise Application Group is responsible for providing formal reports on a regular schedule. These reports include but are not limited to IPEDS and Vets-4212 reports and detail the utilization of both staff and faculty personnel by sex, minority, protected veteran and individual with disability status. 41 CFR § 60-2.17(d)(2)
- ❖ All appointments to tenured positions and other positions as designated by regulation must receive the approval of the Board of Trustees of the University of Kentucky and are officially reported by that body. 41 CFR § 60-2.17(d)(2)
- ❖ Presentations detailing progress toward the goals of the Affirmative Action Plan and the CPE Diversity Policy are made for the executive officers and administrators at the University of Kentucky, the Equal Opportunity Committee, Human Resources, UK HealthCare, and the Kentucky Cooperative Extension Service. In addition, any unit may schedule a presentation or request information by contacting the Office of Institutional Equity and Equal Opportunity. 41 CFR § 60-2.17(d)(3)
- ❖ Regular updates are presented to the President's executive staff on the progress of the affirmative action program. Recommendations are made for goal setting and overcoming deficiencies where identified. 41 CFR § 60-2.17(d)(4)

- ❖ When problems are alleged or identified, the appropriate university official is advised and recommendations are made to ensure full compliance with the University of Kentucky's affirmative action / equal opportunity commitments. 41 CFR § 60-2.17(d)(4)
- ❖ The official disposition of an enforcement agency investigation is forwarded to appropriate University officials. As necessary, recommendations are made to ensure full compliance with the University of Kentucky's affirmative action / equal opportunity commitments, including the terms of any conciliation agreement reached in the disposition of an agency matter. 41 CFR § 60-2.17(d)(4)
- ❖ Statistics are provided to University of Kentucky executive staff on the volume and type of activity by department or college being monitored by the Office of Institutional Equity and Equal Opportunity. Comparisons with statistics from the same period of the previous years may also be available. 41 CFR § 60-2.17(d)(4)

## **COMPLIANCE WITH SEX DISCRIMINATION GUIDELINES**

Regulations pertinent to this portion of the AAP are 41 CFR § 60-20

The OFCCP requires that a contractor include a special section dealing with sex discrimination problems in an affirmative action program. The University of Kentucky has undertaken initiatives to address concerns of female employees as part of its overall evaluation and development of an affirmative action program. In doing so, it has taken action that is consistent with those steps described in 41 CFR § 60-20, which are:

- ❖ All advertisements for positions at the University of Kentucky contain an equal opportunity employer statement. 41 CFR § 60-20.2
- ❖ Personnel policies contained in the Governing and Administrative Regulations of the University of Kentucky expressly prohibit discrimination on the basis of sex. 41 CFR § 60-20.3
- ❖ The University of Kentucky wage and salary administration program for staff employees evaluates positions according to specific criteria and not on the basis of the sex of the incumbent or applicant. 41 CFR § 60-20.4(a)
- ❖ University of Kentucky benefit programs are administered in accordance with federal and state law. Contributions to pension programs are equal for men and women receiving equal income. 41 CFR § 60-20.4(e)
- ❖ The University of Kentucky employment policy does not permit discrimination based on marital status. The University of Kentucky administers its policies and procedures without regard for marital or familial status regardless of sex.
- ❖ The University of Kentucky provides appropriate physical facilities to both sexes.
- ❖ The Commonwealth of Kentucky has revised its law to extend "protective" legislation to men or to abolish such "protection". Applicants for employment are therefore to be evaluated on the basis of individual capabilities.
- ❖ Retirement age for employees, including early retirement, is the same for men and women.
- ❖ The University of Kentucky maternity leave policy permits women to take accumulated temporary disability leave for delivery and recovery. Any additional time, which is requested, for childcare is available either as vacation leave or leave without pay. The best interest of the University is a consideration in any leave without pay, including childcare leave. 41 CFR §60-20.5(d)
- ❖ Any employee, whether or not she has accrued leave, may take leave without pay for six weeks following delivery of a child without loss of her job, as detailed in the Temporary Disability Leave and Family Medical Leave Act (FMLA) policies. 41 CFR § 60-20.5(3-Disparate Impact)
- ❖ Any employee, meeting the eligibility criteria in the FMLA, may take leave without pay following the delivery or adoption of a child without loss of their job, as detailed in the FMLA policy.
- ❖ The University of Kentucky does not base employment decisions on any "seniority system". Therefore, sex-based seniority systems do not exist and action is not necessary. 41 CFR § 60-20.4
- ❖ The University of Kentucky prohibits discrimination in salary administration on the basis of sex. 41CFR § 60-20.4

- ❖ Affirmative action is and has been underway since 1972 to locate and to employ women as described in the University's AAP.
- ❖ All staff development and training programs are open to employees regardless of sex as stated in University policy.
- ❖ University of Kentucky officials review all policies and procedures for handling complaints of sexual harassment in light of changing legal and enforcement agency guidance, including compliance with Title IX of the Education Amendments of 1972 that prohibits discrimination on the basis of sex in education programs or activities operated by recipients of federal financial assistance.
- ❖ Educational programming is offered by the Office of Institutional Equity and Equal Opportunity to provide faculty, students and staff more information regarding discrimination and harassment. The material included in training sessions is updated, as legal and enforcement agency guidance becomes available.
- ❖ Training sessions about discrimination, including sexual harassment, are offered by Human Resource Development, as a part of their regularly scheduled class offerings for supervisors.
- ❖ The UK Center for Research on Violence Against Women advances research into the clinical, legal, cultural and other complexities presented by intimate partner violence, rape, stalking, and related crimes against women.
- ❖ The Violence Intervention and Prevention Center (VIP) provides comprehensive support and services to anyone who has been impacted by power-based personal violence (PBPV) including sexual assault, partner violence, and stalking.
- ❖ From 1992 until present the Office of Institutional Equity and Equal Opportunity has distributed over 220,000 brochures regarding discrimination and harassment.
- ❖ The sexual harassment brochure has been updated and reprinted ten times since its original printing. Currently the policy has been updated into a cohesive discrimination and harassment policy. The current brochure is entitled, *Office of Institutional Equity and Equal Opportunity*.
- ❖ The University of Kentucky's policy prohibiting discrimination and harassment, including sexual harassment, is disseminated internally and externally on the internet at [www.uky.edu/eoo/discrimination-harassment](http://www.uky.edu/eoo/discrimination-harassment)
- ❖ The Office of Institutional Equity and Equal Opportunity has developed a comprehensive web-based training entitled *Preventing Discrimination and Harassment* that delivers a basic understanding of university policy regarding what constitutes discrimination and harassment. It is an interactive course, available online to faculty, staff, and students. It is required of all new employees before the end of their 90 day new employee orientation period.

## COMPLIANCE WITH RELIGIOUS AND NATIONAL ORIGIN DISCRIMINATION GUIDELINES

Regulation pertinent to this portion of the AAP is 41 CFR § 60-50.

The University of Kentucky has long employed persons on the basis of merit, regardless of religion or national origin. As a state institution, it does not and will not require or collect information concerning the religious preference (if any) of its faculty or staff. The University has taken the following actions: 41 CFR § 60-50.2

- ❖ Enunciated a policy prohibiting employment discrimination on the basis of religion or national origin.
- ❖ Disseminated to each employee the policy prohibiting employment discrimination on the basis of religion or national origin.
- ❖ Developed and circulated a brochure regarding harassment on the basis of race, religion, or national origin.
- ❖ Evaluates salary administration to assure that discrimination on the basis of national origin is not practiced.
- ❖ Developed procedures to investigate and resolve complaints of violation of these policies.
- ❖ Advertised, and will continue to advertise, vacant positions in public media to which persons of any religious group or national origin should have access.
- ❖ Disseminates internally and externally the University of Kentucky policies prohibiting religious and national origin discrimination on the internet at [www.uky.edu/eo/discrimination-harassment](http://www.uky.edu/eo/discrimination-harassment).

The University of Kentucky is conscious of its obligations to make reasonable accommodation to an employee's religious beliefs. In most instances shifts in work schedules for religious reasons can be accomplished without undue hardship; in the event this cannot be achieved in a particular position, efforts are made to locate the employee in a different position. In the case of religious holidays, e.g., Yom Kippur, Good Friday, etc., classes may be rescheduled or vacation or other leave may be taken without jeopardy to employment. 41 CFR § 60-50.3.

**AFFIRMATIVE ACTION AND NONDISCRIMINATION CONTRACTORS AND SUBCONTRACTORS  
REGARDING INDIVIDUALS WITH DISABILITIES AFFIRMATIVE ACTION PLAN**

41 CFR§ 60-741

The University of Kentucky has developed this Affirmative Action Plan for any “qualified individual with a disability” holding or desiring employment and the benefits thereof and/or previously admitted or desiring admission to any University of Kentucky program, activity, or service. For the purposes of this Affirmative Action Plan the definition of a “qualified individual with a disability” is any individual who:

- i. has a physical or mental impairment substantially limiting one or more major life activity,
- ii. has a record of such an impairment, or
- iii. is regarded as having such an impairment; and who can, with or without accommodation, otherwise perform the essential functions of the position, held or desired, or meet the technical standards of the program to which admission is granted or desired.

A qualified individual with a disability must satisfy all the requisite skills, education, experience and/or admission criteria that the desired position or program requires. All definitions and exclusions in § 503 and § 504 of the Rehabilitation Act of 1973, as amended, and the more expansive Americans with Disabilities Act of 1990 (ADA) and the ADA Amendments Act of 2008 shall apply. No person may be denied any benefit of the University of Kentucky based solely on disability.

The written University of Kentucky Affirmative Action Plan (AAP), including the AAP for Individuals with Disabilities, in accordance with Executive Order 11246, Section 503 of the Rehabilitation Act of 1973, and The Vietnam Era Veterans’ Readjustment Assistance Act of 1974 (VEVRAA), may be viewed in the Office of Institutional Equity and Equal Opportunity. The AAP is available from 9:00am until noon and from 1:00pm until 4:00pm Monday through Friday when the University of Kentucky is officially in session. The AAP can also be viewed on the Office of Institutional Equity and Equal Opportunity website at [www.uky.edu/eo/federal-reporting](http://www.uky.edu/eo/federal-reporting).

**INVITATION TO SELF-IDENTIFY**

41 CFR§ 60-741.42

On March 24, 2014 the University of Kentucky began inviting all applicants to voluntarily self-disclose whether they consider themselves an individual with a disability (IWD). The Human Resource Office provides the required self-id form through the University’s Integrated Employment System (IES). The form is offered with the demographic data of gender, race and veteran status. It is optional for the applicant to fill out. Once an applicant is hired the employee is again invited to voluntarily self-disclose their status as an IWD. The new hire is given the required form with the I-9 packet Human Resources administers. The employee may fill out the required self-id form and turn it into the Human Resources Employment Office.

There is limited access to this form and is only used for reporting purposes by the Office of Institutional Equity and Equal Opportunity.

The University invited the workforce in October 2014 to voluntarily self-identify whether they consider themselves as an individual with a disability via a university-wide email. The email contained instructions on how to access the electronic form through the University's operating system, SAP. The Office of Institutional Equity and Equal Opportunity will extend the invitation to the University's workforce at five-year intervals even though employees can fill the form out at any time. The self-id form along with other demographic data is stored electronically and separate from the employment applications, personnel records and employee medical files. This information is kept confidential and is not used for any hiring or employment decisions. The data is collected annually and used to identify the effectiveness of recruitment and outreach efforts as required by OFCCP.

### **AFFIRMATIVE ACTION POLICY**

41 CFR§ 60-741.43

The University of Kentucky hereby reaffirms its commitment to the principle of equal employment opportunity in its personnel policies and procedures. The University of Kentucky [Governing Regulations Part XIV.B.1](#), governing both instructional and non-instructional personnel, states the University of Kentucky nondiscrimination policy:

The University of Kentucky complies with the federal and state constitutions, and all applicable federal and state laws, regarding discrimination. The University provides equal opportunities for qualified persons in all aspects of University operations, and does not discriminate on the basis of race, color, national origin, ethnic origin, religion, creed, age, physical or mental disability, veteran status, uniformed service, political belief, sex, sexual orientation, gender identity, gender expression, pregnancy, marital status, genetic information, social or economic status, or whether the person is a smoker or nonsmoker, as long as the person complies with University policy concerning smoking.

All University members are expected to comply with the institution's nondiscrimination policy. The President is responsible for the development of an affirmative action plan by which full implementation of this policy shall be effected in the University.

The revised [Governing Regulations Part I.D](#) adopted by the Board of Trustees on June 14, 2005 added a statement on diversity:

The University is committed to diversity as a vital characteristic of an optimal education and workplace. The University maintains a firm conviction that it must strengthen the diversity of its communities, support free expression, reasoned discourse and diversity of ideas; and take into account a wide range of considerations, including but not limited to, ethnicity, race, disability, and sex, when making personnel and policy decisions. The University is committed to periodically evaluating progress made toward diversity and to communicating the results of such evaluations. Based upon these assessments, the University will give diversity factors consideration to ensure achievement of its mission of instruction, research and service and gain the broadest benefits for the University community.

[Governing Regulation Part X.A.1](#) establishes merit as the only criteria for academic employment:

All appointments shall be made strictly on the basis of merit. An applicant for a position shall not be discriminated against because of race, color, national origin, ethnic origin, religion, creed, age, physical or mental disability, veteran status, uniformed service, political belief, sex, sexual orientation, gender identity, gender expression, pregnancy, marital status, genetic information, social or economic status, or whether the person is a smoker or nonsmoker, as long as the person complies with University policy concerning smoking.

Further delineation of this fundamental governing regulation is made in [Human Resource Policy Number 2.0](#) entitled “Equal Opportunity, Discrimination and Harassment” which states:

All employment decisions shall be made uniformly on the basis of merit. Equal opportunities shall be provided for all persons throughout the University in recruitment, appointment, promotion, payment, training, and other employment practices without regard to race, color, national origin, ethnic origin, religion, creed, age, physical or mental disability, veteran status, uniformed service, political belief, sex, sexual orientation, gender identity, gender expression, pregnancy, marital status, genetic information, social or economic status, or whether the person is a smoker or nonsmoker, as long as the person complies with University policy concerning smoking.

The Strategic Plan of the University states:

*[Strategic Objective: Diversity and Inclusivity](#)*. Enhance the diversity and inclusivity of the University community through recruitment and retention of an increasingly diverse population of faculty, administrators, staff, and students, and by implementing initiatives that provide rich diversity-related experiences for all to help ensure their success in an interconnected world.

The University will achieve this by working collaboratively to create an environment where all of our students, faculty, and staff live or work in an environment of openness and acceptance, and in which people of all backgrounds, identities, and perspectives can feel secure and welcome.

This strategy extends beyond employment, to the matriculation of students at all levels of academic endeavor. Equal Opportunity for students at the University of Kentucky is delineated in the student handbook entitled Student Code of Conduct, which states:

## Right of Admission and Access

### Admission Policy, Scholarships, Grants-in-Aid, and Financial Aid

UK complies with the federal and state Constitutions, and all applicable federal and state laws, regarding nondiscrimination. Students and applicants for admission to UK, or for financial aid or scholarship, will not be discriminated against because of race, color, national origin, ethnic origin, religion, creed, age, physical or mental disability, veteran status, uniformed service, political belief, sex, sexual orientation, gender identity, gender expression, pregnancy, marital status, genetic information, social or economic status, whether the person is a smoker or nonsmoker, as long as the person complies with UK policy concerning smoking.

#### Use of Facilities and Services

The University may delineate the purpose for which students may use certain facilities and shall make them available on a fair and equitable basis. However, the University may restrict its facilities and services when their use would interfere with normal University operations.

#### Discrimination in the Community

The University will use its influence to secure equal access for all students to public facilities in the local community.

The Office of Institutional Equity and Equal Opportunity is the University office responsible for the development of policy and monitoring of compliance with all of the University of Kentucky Equal Opportunity commitments. The Office of Institutional Equity and Equal Opportunity is responsible for the ongoing analysis and reporting under the Affirmative Action Plan. Anyone having questions or comments regarding the University of Kentucky equal opportunity and affirmative action policies should contact the Office of Institutional Equity and Equal Opportunity.

### **REVIEW OF PERSONNEL PROCESS**

41 CFR§ 60-741.44 (b)

All persons applying for employment, faculty or staff, at the University of Kentucky, are considered based on their qualifications to perform the functions of the position for which their documentation is completed. Likewise, students are considered on their academic and related credentials with respect to the program for which they make application.

Staff positions at the University of Kentucky are filled from applicant pools made up of those individuals who have met the definition of an applicant as detailed in the employment policy. Applicant pools are determined based on submitted documentation of qualifications and forwarded to the hiring official for consideration. Hiring officials are instructed in the proper consideration of qualifications and interviewing techniques.

The University of Kentucky has a policy of considering persons for faculty appointment on the basis of merit. Individual contribution to the academic programs of the University is the primary consideration in all faculty appointments. Faculty promotion decisions are made on established academic performance criteria.

Qualified persons with disabilities may request reasonable accommodations at any time in their employment process. The University of Kentucky request for reasonable accommodation form may be requested through the Office of Institutional Equity and Equal Opportunity or located online at [www.uky.edu/eeo/ada-compliance](http://www.uky.edu/eeo/ada-compliance) or on [UK's eForms](#) page under [ADA Reasonable Accommodation Form](#).

This information is filed in a location separate from the employee's employment record and is maintained in a confidential manner.

The University of Kentucky benefits program is available to employees, without regard to disability. Health, life, and other insurance options are available to all employees meeting certain length-of service requirements. An offering of basic single health insurance options is provided for employees, without regard for pre-existing conditions. Likewise, the University's compensation policy is administered for all employees without regard to disability.

In January 2009, UK established the Hiring Enhancement Program to provide training, resources and tools for hiring officials. The program is intended to educate hiring officials on effective and legally credible hiring practices. A variety of trainings are offered annually which include: Legal Considerations -- The Dos & Don'ts of Interview Questions; How to Develop an Effective Job Posting; Behavior Based Interviewing Series; and UK's Hiring Fundamentals and Interviewing Techniques. HR also conducts the interviewing and selecting portion of the University's SuperVision course offered on a regular basis to all new supervisors. This program has three dedicated Employment Consultants that offer multiple customized resources including: behavior based interview guides (phone, in-person and/or reference checks); department consultations; and trainings. A website has been developed to provide tools to hiring officials wherever they are in the hiring process.

Hiring Enhancement trainings are evaluated by participants. A standardized form is used to solicit specific feedback as well as obtain future learning opportunities. This feedback is reviewed and changes are implemented to evolve the training. Multiple tools and resource guides have been developed based on this feedback.

Additionally, an annual survey is distributed to hiring officials to assess the hiring process and all selection tools provided by HR. The results are analyzed to determine improvement priorities for the following year. This annual survey has been in place since 2008.

In 2015, a comprehensive training on Unconscious Bias was introduced. The initiative is intended to train students, faculty, administrators and staff on the concept of Unconscious Bias and how to mitigate these biases in everyday interactions. These trainings have since expanded to address Unconscious Bias within the hiring and selection process.

## **PHYSICAL AND MENTAL QUALIFICATIONS**

41 CFR§ 60-741.44 (c)

Staff positions are evaluated to determine the physical and mental requirements of each using a job analysis questionnaire. The University of Kentucky regularly reevaluates staff positions requiring, in part, the analysis of physical and mental qualifications and the essential functions of all positions.

In 2014, the position description evaluation form was modified to more accurately reflect the position requirements, including, but not limited to the following:

- ❖ Knowledge and skills
- ❖ Problem solving
- ❖ Independent action, judgement and analytical skills
- ❖ Resource and employee management
- ❖ Occupational/physical risk exposure

Simultaneously, the posting details were updated to include a new field listing the position's "Physical Requirements". This allowed more transparency in regards to physical and mental requirements of the job. It is also important to note that the Physical Requirement field is reviewed by HR each time the job is posted.

A best practice identified through the Hiring Enhancement Program, is to ensure the "Essential Function" question is asked of every candidate interviewed to ensure the individual can perform all job duties with or without reasonable accommodations. Hiring officials are referred to the Office of Institutional Equity and Equal Opportunity if a candidate, new hire or employee inquires about potential accommodations.

Faculty positions defy this same manner of evaluation by their focus on academic contribution. Every faculty opening must be evaluated based on the needs of the academic program and may widely vary among, and even within, academic disciplines. While mental qualifications are influenced by strict educational credential requirements, reasonable accommodations can and are made for faculty with both mental and physical limitations when requested.

The technical standards of individual academic programs are evaluated to determine the qualifications for participation. All programs, like employment positions, are encouraged to reevaluate on a periodic basis or whenever there has been a change in technical standards.

## **REASONABLE ACCOMMODATION TO PHYSICAL AND MENTAL LIMITATIONS**

41 CFR§ 60-741.44 (d)

The University of Kentucky is committed to reasonable accommodations for qualified faculty, staff, and students with disabilities. Accommodations take many forms at the University of Kentucky for known disabilities, both physical and mental. Experts in accommodations, adaptive technology, special education, mental and physical health, vocational rehabilitation counseling, and rehabilitation engineering are available on campus and are utilized as needs are identified. Outside agencies and contacts are maintained as additional expert resources.

Employees, both faculty and staff, may request accommodations in their respective departments or may make requests in the Office of Institutional Equity and Equal Opportunity. Employee Relations Specialists refer employees and supervisors to the office when assistance in determining appropriate accommodations may be needed, especially when work performance problems may be related to a disability. The process includes filling out an ADA Reasonable Accommodation Form and submitting to the Office of Institutional Equity and Equal Opportunity for review. Upon approval, the Office of Institutional Equity and Equal Opportunity works with the employee and the department to implement the accommodation.

The University of Kentucky Disability Resource Center provides essential services for the accommodation of students with disabilities. The accommodated disabilities are diverse including students with: chronic health conditions, temporary disabilities and permanent disabilities encompassing those with physical, learning and psychological disabilities. In addition to direct services such as interpreter services or accessible textbook services, the Center is a campus resource for the entire University community who has questions about assisting students with disabilities. In recent semesters, the Center has seen an increase in students requesting services, especially students with psychological conditions. Likewise, the number of students requesting exam accommodations has significantly increased. With the University offering of distance learning classes, the Center has adapted to a relatively new role of accommodating students from remote locations who have disabilities.

## **HARASSMENT**

41 CFR§ 60-741.44 (e)

The Office of Institutional Equity and Equal Opportunity is available to the University to answer questions and concerns regarding the provisions of the ADA and reasonable accommodations. Training is developed and updated to respond to concerns and questions regarding equal opportunity for faculty, staff, and students with disabilities. Special effort is expended to address those stereotypes that may limit access to equal opportunity in employment or education.

Complaints alleging harassment or denial of reasonable accommodations are investigated and remedies, where appropriate, are recommended. Any employee or applicant for employment who believes that the University of Kentucky has discriminated against her or him because she or he has a disability may contact the University of Kentucky Office of Institutional Equity and Equal Opportunity. A representative of this office will investigate the complaint and recommend appropriate administrative action.

## **OUTREACH AND POSITIVE RECRUITMENT**

41 CFR§ 60-741.44 (f)

The University of Kentucky has established a reputation as an educational institution accessible to people with disabilities. Meaningful contacts are maintained with service organizations and groups of disabled persons. Students and potential employees have been identified and referred to the University as a result of these contacts. The University began posting positions with outside agencies who specialize in assisting individuals with disabilities in July 2015.

As a large employer it was essential for University of Kentucky (UK) to establish a consistent method of outreach to IWDs. Over the past two years UK has partnered with advertising and outreach organizations to distribute job opportunities beyond UK Jobs (University of Kentucky's online job board). These partnerships were designed to create an automated process to scrape UK Jobs nightly and re-distribute job opportunities to targeted job sites specifically recruiting veterans, individuals with disabilities and minorities.

- ❖ From July 1, 2015 to June 30, 2016, the University partnered with **America's Job Exchange**.
  - ◆ Specifically targeted websites for IWDS included:
    - [www.disabilityjobexchange.com](http://www.disabilityjobexchange.com)
    - [www.disabledperson.com](http://www.disabledperson.com)
  - ◆ This partnership also includes posting positions to Kentucky's state job board/Career Center.
- ❖ From July 1, 2016 to June 30, 2017, the University partnered with **OneClick (JobTarget)**.
  - ◆ Specifically targeted websites for IWDS included:
    - [www.jofdav.com](http://www.jofdav.com)
    - [www.disabledperson.com](http://www.disabledperson.com)
  - ◆ This partnership also includes posting positions to Kentucky's state job board/Career Center.

Although tracking the success of this online recruiting is challenging, the University proactively ask individuals to disclose "how they heard about the job opportunity". This advertising data is reviewed annually to ensure financial investments are positively impacting our applicant pools as well as hiring metrics.

In September 2016, UK expanded the language in each and every posting to emphasize its commitment to a diverse and inclusive workforce. This language complements the standard EEO statement at the footer of each posting as well as aligns with the University's Strategic Plan. Please see below for the specific verbiage:

### ***University Community of Inclusion***

- ❖ *The University of Kentucky is committed to a diverse and inclusive workforce by ensuring all our students, faculty, and staff work in an environment of openness and acceptance. We strive to foster a community where people of all backgrounds, identities, and perspectives can feel secure and welcome. We also value the well-being of each of our employees and are dedicated to creating a healthy place to work, learn and live. In the interest of maintaining a safe and healthy environment for our students, employees, patients and visitors the University of Kentucky is a Tobacco & Drug Free campus.*

*As an Equal Opportunity Employer, we strongly encourage veterans, individuals with disabilities, women, and all minorities to consider our employment opportunities.*

*Any candidate offered a position may be required to pass pre-employment screenings as mandated by University of Kentucky Human Resources. These screenings may include a national background check and/or drug screen.*

On a local level, UK has developed a working relationship with Employment Solutions. The Employment Solutions group encompasses several divisions including the College for Technical Education, Bluegrass Career Services, and Employment Solutions Personnel. Employment Solutions Personnel works to train individuals with disabilities or other barriers to employment while Bluegrass Career Services works to find these individuals jobs after they have graduated from the training. Human Resources also directly works with the Unemployment Office which is a division of the Kentucky Career Center to maintain open lines of communication and post job opportunities.

As for communicating to contractors and subcontractors regarding the University's commitment to provide equal employment opportunities to IWDs, the below verbiage has been embedded in the General Terms and Conditions for every contract.

- ❖ *Section 503: Disabilities*
  - ◆ *This contractor and subcontractor shall abide by the requirements of 41 CFR 60-741.5(a). This regulation prohibits discrimination against qualified individuals on the basis of*

*disability, and requires affirmative action by covered prime contractors and subcontractors to employ and advance in employment qualified individuals with disabilities.*

UK has also established a Supplier Diversity Procurement Program.

The University of Kentucky encourages enrollment of students with disabilities by making available accessible housing options and student support services. The University of Kentucky by its commitment to equal educational opportunity for persons with disabilities returns to the greater community well-educated potential employees. While no statistics are available, anecdotal evidence of this return is apparent in the employment of UK graduates with disabilities on campus and in the community.

The University of Kentucky has established design guidelines for the campus that meet the accessibility requirements of the ADA and accommodate individuals with disabilities but avoid awkward, isolating elements intended only for people with disabilities. It is the University of Kentucky's intention, as outlined by the University architect, to "make the campus accessible by considering necessary site and building elements early in the design process and finding graceful and natural solutions that are appropriately integrated with the rest of the campus setting."

The University of Kentucky considers program accessibility for students, faculty, staff and visitors using campus facilities. To cite just one example, several facilities have been equipped with assistive listening devices to provide accessible programs for hearing impaired individuals. Memorial Coliseum, Memorial Hall, Singletary Center for the Arts, and the Fine Arts Building are equipped as described. Constituent needs and the burgeoning developments in adaptive technology are continually assessed to improve both physical and programmatic access.

The University of Kentucky makes some services and programs available on the website at [www.uky.edu](http://www.uky.edu). These web pages and other online access to the programs at the University of Kentucky are meant to be accessible under § 508 of the Rehabilitation Act and the implementing guidance.

The University of Kentucky Transportation Services strongly supports the concept of fair and equitable facilities for persons with disabilities. UK Transportation Services provide students and employees with disabilities an equitable and uniform system of administrative, enforcement, and design standards. This helps to ensure the lawful use of parking spaces and the availability of a dependable transit service with lift-equipped buses. When designing new parking spaces and bus stops on campus for everyone, especially people with disabilities, the distance to final destinations along accessible routes is a priority. Applications for parking from persons with disabilities are given full consideration by administrative and medical personnel to assure compliance with all applicable equal opportunity regulations.

The University of Kentucky is accessible by public transportation from Lexington/Fayette County. This transportation is available regularly and is accessible to persons with disabilities. Lextran operates a paratransit system, WHEELS, for people with disabilities unable to access other forms of transportation in the community. This service is regularly on campus with both student and employee users.

### **ASSESSMENT OF EXTERNAL OUTREACH AND RECRUITMENT EFFORTS**

41 CFR§ 60-741.44 (f)(3)

To assist in meeting the Department of Labor Office of Federal Contract Compliance Programs reporting and outreach requirements, the HR Employment Office purchased a variety of targeted job boards to advertise staff and faculty positions. These job boards includes JobTarget's OneClick recruitment platform. JobTarget posts positions to Kentucky's state job board as well as a vast network of job boards which include:

- ◆ VetJobs ([www.vetjobs.com](http://www.vetjobs.com))
- ◆ Veterans Enterprise ([www.VeteransEnterprise.com](http://www.VeteransEnterprise.com) )
- ◆ Be A Hero – Hire a Hero ([www.beahero-hireahero.com](http://www.beahero-hireahero.com))
- ◆ JOFDAV – Job Opportunities for Disabled American Veterans ([www.jofdav.com](http://www.jofdav.com))
- ◆ Disabled Person ([www.disabledperson.com](http://www.disabledperson.com))
- ◆ The Black Perspective ([www.blackperspective.com](http://www.blackperspective.com))
- ◆ Hispanic Today ([www.hispanic-today.com](http://www.hispanic-today.com))
- ◆ Women in Business & Industry ([www.wib-i.com](http://www.wib-i.com))
- ◆ Women For Hire ([www.womenforhire.com](http://www.womenforhire.com))

In addition to the unlimited postings on HigherEdJobs.com, the HR Employment Office purchased Affirmative Action (AA) e-mails that can be utilized with designated job postings. When an AA e-mail is used, an e-mail will be sent to approximately 250,000 job seekers featuring the job posting along with other postings from universities who are actively recruiting candidates in accordance with affirmative action or diversity plans. Although tracking the success of this online recruiting is challenging, we proactively ask individuals to disclose “how he/she heard about the job opportunity”. This advertising data is reviewed annually to ensure financial investments are positively impacting our applicant pools as well as hiring metrics.

The University needs to expand its outreach and recruitment efforts for IWDs. Human Resources participation in job fairs directed at assisting individuals with disabilities should be attended on a frequent basis along with meeting with state agencies that assists in providing employment resources for individuals with disabilities

Appendix AAP G reflects the analysis of disclosed individuals with a disability within the University of Kentucky workforce.

## DISSIMINATION OF POLICY

41 CFR§ 60-741.44 (g)

### Internal Dissemination

- ❖ The Equal Opportunity Policy statement is posted in University employment offices, placement offices and other appropriate areas.
- ❖ The policy statement is included in all appropriate University publications including all employee handbooks and policy books, which are available to all employees on the web. New employees receive copies of the statement and other information about the University's policy of equal opportunity at orientation programs.
- ❖ Training sessions are conducted by the University's Office of Institutional Equity and Equal Opportunity with departments and colleges to highlight the University's commitment to diversity, equal opportunity and affirmative action. All new supervisors are required to attend discrimination and harassment training through SuperVision.
- ❖ The Office of Institutional Equity and Equal Opportunity conducts annual meetings with University officials to review their responsibility for effective implementation of the University's Equal Opportunity Policy.
- ❖ University brochures, newsletters, annual reports and other publications reiterate the University's commitment to equal opportunity.
- ❖ The equal opportunity policy is included in all purchase orders, requisitions, and contracts covered by Executive Order 11246 (as amended) and implementing regulations.

### External Dissemination

- ❖ The University communicates to prospective employees in all employment advertisements that it is an Equal Opportunity Employer.
- ❖ All contractors, subcontractors, vendors, and suppliers have been notified of the University's Equal Opportunity Policy and are required to comply with Executive Order 11246 (as amended) and its implementing regulations. The University has agreed to transact business only with firms adhering to these practices.
- ❖ All recruiting sources and other referral sources have been advised of the University's Equal Opportunity Policy.

## **AUDITING AND REPORTING SYSTEM**

41 CFR§ 60-741.44 (h)

The Office of Institutional Equity and Equal Opportunity is the office responsible for developing and managing the Affirmative Action Plan on an annual basis. Information and data for the Affirmative Action Plan are collected from numerous departments throughout the University. The Human Resources Employment office is responsible for outreach and recruitment initiatives brought on by the new federal regulations for individuals with disabilities. The Office of Institutional Equity and Equal Opportunity met with all levels of administration to inform them of the new regulations and discuss the necessary outreach initiatives. Although the regulations have been put in place there is still work to be done. For future auditing, the Office of Institutional Equity and Equal Opportunity needs to take a more active role in reviewing personnel activities to ensure such activities are free from discrimination and assist with outreach and recruitment efforts towards individuals with disabilities. Through data collection and documentation, the Office of Institutional Equity and Equal Opportunity, needs to track the efforts that have been set-forth. The University will take all necessary action to bring the program into compliance if found to be deficient. Although the Office of Institutional Equity and Equal Opportunity is responsible for the implementation of the AAP; the responsibility is likewise vested with each administrator, department manager and supervisor.

## **RESPONSIBILITY FOR IMPLEMENTATION**

41 CFR§ 60-741.44 (i)

The Office of Institutional Equity and Equal Opportunity is the University of Kentucky office responsible for the development of recommendations on policy and compliance with all of the University of Kentucky affirmative action / equal opportunity commitments, including the ADA and § 503, § 504 and §508 of the Rehabilitation Act of 1973, as amended.

## **UTILIZATION GOAL**

41 CFR§ 60-741.45

The Department of Labor Office of Federal Contract Compliance Programs has established a utilization goal of 7.0 percent for each job group in the workforce for qualified individuals with disabilities.

The University of Kentucky evaluates the University's workforce as a whole when assessing underutilization of individuals with a disability in each job group on an annual basis.

This analysis may be found for the University of Kentucky at AAP Appendix I at [www.uky.edu/eo/federal-reporting](http://www.uky.edu/eo/federal-reporting).



**AFFIRMATIVE ACTION AND NONDISCRIMINATION OBLIGATIONS OF FEDERAL CONTRACTORS AND SUBCONTRACTORS REGARDING DISABLED VETERANS, RECENTLY SEPERATED VETERANS, ACTIVE DUTY WARTIME OR CAMPAIGN BADGE VETERANS, AND ARMED FORCES SERVICE MEDALVETERANS**

41 CFR §60-300

The Vietnam-Era Veterans Readjustment Act of 1974 and the Jobs for Veterans Act require certain federal contractors to take affirmative action for the employment of disabled veterans, recently separated veterans, active duty wartime or campaign badge veterans, and Armed Forces Service Medal Veterans. The procedures described in this Plan are designed to achieve the objectives of these Acts. The procedures described in this Plan apply to full-time and part-time staff positions of the University of Kentucky. Student employment is included although, by its terms such employment is designed to further the educational objective of the student. For this purpose, student employment includes Graduate Assistant, Graduate Research Assistant, Post-Doctoral Scholars, Research Assistants, Residents, Student Teaching Assistants, and Student/Non-Work Study. All staff positions are posted on the University of Kentucky online employment system with the qualifications needed for each. The online employment system is available to all state employment services, vocational rehabilitation services, and veteran's affairs offices. The University of Kentucky intends to continue to provide employment opportunities for disabled veterans, recently separated veterans, active duty wartime or campaign badge veterans, and Armed Forces Service Medal Veterans.

**INVITATION TO SELF-IDENTIFY**

41 CFR §60-300.42

The Human Resources office invites voluntary self-disclosure of an applicant's status as a protected veteran in the pre-offer stage of employment. Disabled veterans may disclose a disability at any time during the employment process and request reasonable accommodation. The Human Resource Office also invites voluntary self-disclosure to the employee's status as a protected veteran based on the specific categories of disabled veterans, recently separated veterans, active duty wartime or campaign badge veterans, Armed Forces Service Medal Veterans, after an offer of employment has been made. This information is kept confidential and is not used for any hiring or employment decisions. The data is collected annually and used to identify the effectiveness and recruitment of outreach efforts as required by OFCCP. In October 2016, the University invited the workforce to voluntarily self-identify as a protected veteran based on the new categories.

**AFFIRMATIVE ACTION POLICY**

41 CFR §60-300.43

The University of Kentucky agrees not to discriminate against disabled veterans, recently separated veterans, active duty wartime or campaign badge veterans, Armed Forces Service Medal Veterans and shall take affirmative action to employ and advance in employment qualified disabled veterans, recently

separated veterans, active duty wartime or campaign badge veterans, Armed Forces Service Medal Veterans at all levels of employment, including the executive level.

The University of Kentucky hereby reaffirms its commitment to the principle of equal employment opportunity in its personnel policies and procedures. The University of Kentucky [Governing Regulations Part XIV.B.1](#), governing both instructional and non-instructional personnel, states the University of Kentucky nondiscrimination policy:

The University of Kentucky complies with the federal and state constitutions, and all applicable federal and state laws, regarding discrimination. The University provides equal opportunities for qualified persons in all aspects of University operations, and does not discriminate on the basis of race, color, national origin, ethnic origin, religion, creed, age, physical or mental disability, veteran status, uniformed service, political belief, sex, sexual orientation, gender identity, gender expression, pregnancy, marital status, genetic information, social or economic status, or whether the person is a smoker or nonsmoker, as long as the person complies with University policy concerning smoking.

All University members are expected to comply with the institution's nondiscrimination policy. The President is responsible for the development of an affirmative action plan by which full implementation of this policy shall be effected in the University.

The revised [Governing Regulations Part I.D](#) adopted by the Board of Trustees on June 14, 2005 added a statement on diversity:

The University is committed to diversity as a vital characteristic of an optimal education and workplace. The University maintains a firm conviction that it must strengthen the diversity of its communities, support free expression, reasoned discourse and diversity of ideas; and take into account a wide range of considerations, including but not limited to, ethnicity, race, disability, and sex, when making personnel and policy decisions. The University is committed to periodically evaluating progress made toward diversity and to communicating the results of such evaluations. Based upon these assessments, the University will give diversity factors consideration to ensure achievement of its mission of instruction, research and service and gain the broadest benefits for the University community.

[Governing Regulation Part X.A.1](#) establishes merit as the only criteria for academic employment:

All appointments shall be made strictly on the basis of merit. An applicant for a position shall not be discriminated against because of race, color, national origin, ethnic origin, religion, creed, age, physical or mental disability, veteran status, uniformed service, political belief, sex, sexual orientation, gender identity, gender expression, pregnancy, marital status, genetic information, social or economic status, or whether the person is a smoker or nonsmoker, as long as the person complies with University policy concerning smoking.

Further delineation of this fundamental governing regulation is made in [Human Resource Policy Number 2.0](#) entitled "Equal Opportunity, Discrimination and Harassment" which states:

All employment decisions shall be made uniformly on the basis of merit. Equal opportunities shall be provided for all persons throughout the University in recruitment, appointment,

promotion, payment, training, and other employment practices without regard to race, color, national origin, ethnic origin, religion, creed, age, physical or mental disability, veteran status, uniformed service, political belief, sex, sexual orientation, gender identity, gender expression, pregnancy, marital status, genetic information, social or economic status, or whether the person is a smoker or nonsmoker, as long as the person complies with University policy concerning smoking.

The Strategic Plan of the University states:

[Strategic Objective: Diversity and Inclusivity](#). Enhance the diversity and inclusivity of the University community through recruitment and retention of an increasingly diverse population of faculty, administrators, staff, and students, and by implementing initiatives that provide rich diversity-related experiences for all to help ensure their success in an interconnected world.

The University will achieve this by working collaboratively to create an environment where all of our students, faculty, and staff live or work in an environment of openness and acceptance, and in which people of all backgrounds, identities, and perspectives can feel secure and welcome.

This strategy extends beyond employment, to the matriculation of students at all levels of academic endeavor. Equal Opportunity for students at the University of Kentucky is delineated in the student handbook entitled Student Code of Conduct, which states:

#### Right of Admission and Access

##### Admission Policy, Scholarships, Grants-in-Aid, and Financial Aid

UK complies with the federal and state Constitutions, and all applicable federal and state laws, regarding nondiscrimination. Students and applicants for admission to UK, or for financial aid or scholarship, will not be discriminated against because of race, color, national origin, ethnic origin, religion, creed, age, physical or mental disability, veteran status, uniformed service, political belief, sex, sexual orientation, gender identity, gender expression, pregnancy, marital status, genetic information, social or economic status, whether the person is a smoker or nonsmoker, as long as the person complies with UK policy concerning smoking.

##### Use of Facilities and Services

The University may delineate the purpose for which students may use certain facilities and shall make them available on a fair and equitable basis. However, the University may restrict its facilities and services when their use would interfere with normal University operations.

##### Discrimination in the Community

The University will use its influence to secure equal access for all students to public facilities in the local community.

The Office of Institutional Equity and Equal Opportunity is the University office responsible for the development of policy and monitoring of compliance with all of the University of Kentucky Equal Opportunity commitments. The Office of Institutional Equity and Equal Opportunity is responsible for the ongoing analysis and reporting under the Affirmative Action Plan. Anyone having questions or comments regarding

the University of Kentucky equal opportunity and affirmative action policies should contact the Office of Institutional Equity and Equal Opportunity.

## **REVIEW OF PERSONNEL PROCESSES**

41 CFR §60-300.44 (b)

Human Resources personnel study position descriptions to assure that job requirements are related to essential job functions. The purpose of this assessment is to assure that job requirements are related to business necessity and the safe performance of the job. The University of Kentucky is prepared to make reasonable accommodations to disabled applicants consistent with legitimate position requirements.

In January 2009, UK established the Hiring Enhancement Program to provide training, resources and tools for hiring officials. The program is intended to educate hiring officials on effective and legally credible hiring practices. A variety of trainings are offered annually which include: Legal Considerations -- The Dos & Don'ts of Interview Questions; How to Develop an Effective Job Posting; Behavior Based Interviewing Series; and UK's Hiring Fundamentals and Interviewing Techniques. HR also conducts the interviewing and selecting portion of the University's SuperVision course offered on a regular basis to all new supervisors. This program has three dedicated Employment Consultants that offer multiple customized resources including: behavior based interview guides (phone, in-person and/or reference checks); department consultations; and trainings. A website has been developed to provide tools to hiring officials wherever they are in the hiring process.

Hiring Enhancement trainings are evaluated by participants. A standardized form is used to solicit specific feedback as well as obtain future learning opportunities. This feedback is reviewed and changes are implemented to evolve the training. Multiple tools and resource guides have been developed based on this feedback.

Additionally, an annual survey is distributed to hiring officials to assess the hiring process and all selection tools provided by HR. The results are analyzed to determine improvement priorities for the following year. This annual survey has been in place since 2008.

In 2015, a comprehensive training on Unconscious Bias was introduced. The initiative is intended to train students, faculty, administrators and staff on the concept of Unconscious Bias and how to mitigate these biases in everyday interactions. These trainings have since expanded to address Unconscious Bias within the hiring and selection process.

## **PHYSICAL AND MENTAL QUALIFICATIONS**

41 CFR§ 60-300.44 (c)

Staff positions are evaluated to determine the physical and mental requirements of each position using a job analysis questionnaire. The University of Kentucky regularly reevaluates staff positions requiring, in part, the analysis of physical and mental qualifications and the essential functions of all positions.

In 2014, the position description evaluation form was modified to more accurately reflect the position requirements, including, but not limited to the following:

- ❖ Knowledge and skills
- ❖ Problem solving
- ❖ Independent action, judgement and analytical skills
- ❖ Resource and employee management
- ❖ Occupational/physical risk exposure

Simultaneously, the posting details were updated to include a new field listing the position's "Physical Requirements". This allowed more transparency in regards to physical and mental requirements of the job. It is also important to note that the Physical Requirement field is reviewed by HR each time the job is posted. A best practice identified through the Hiring Enhancement Program, is to ensure the "Essential Function" question is asked of every candidate interviewed to ensure the individual can perform all job duties with or without reasonable accommodations. Hiring officials are referred to the Office of Institutional Equity and Equal Opportunity if a candidate, new hire or employee inquires about potential accommodations.

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mental and physical health, vocational rehabilitation counseling, and rehabilitation engineering are available on campus and are utilized as needs are identified. Outside agencies and contacts are maintained as additional expert resources.

Employees, both faculty and staff, may request accommodations in their respective departments or may make requests in the Office of Institutional Equity and Equal Opportunity. Employee Relations Specialists refer employees and supervisors to the office when assistance in determining appropriate accommodations may be needed, especially when work performance problems may be related to a disability.

The University of Kentucky Disability Resource Center provides essential services for the accommodation of students with disabilities. The accommodated disabilities are diverse including students with: chronic health conditions, temporary disabilities, and permanent disabilities encompassing those with physical, learning and psychological disabilities. In addition to direct services such as interpreter services or accessible textbook services, the Center is a campus resource for the entire University community who has questions about assisting students with disabilities. In recent semesters, the Center has seen an increase in students requesting services, especially students with psychological conditions. Likewise, the number of students requesting exam accommodations has significantly increased. With the University offering of distance learning classes, the Center has adapted to a relatively new role of accommodating students from remote locations who have disabilities.

#### **HARASSMENT**

41 CFR §60-300.44 (e)

Any employee or applicant for employment who believes that the University of Kentucky has discriminated against her or him because she or he is a Vietnam-era veteran, disabled veteran, Armed Forces Service Medal Veteran, recently separated veteran and other protected veteran, or any veteran of uniformed military status may contact the University of Kentucky Office of Institutional Equity and Equal Opportunity. A representative of this office will investigate the complaint and recommend appropriate administrative action.

#### **OUTREACH AND POSITIVE RECRUITMENT**

41 CFR §60-300.44 (f)

The Human Resources Employment office participates in community activities to inform people and support employment opportunities at the University. Federal and state benefit programs for veterans and eligible dependents are coordinated through the Office of the Registrar which provides staffing to assist with Veterans Administration benefits. Information is also communicated and solicited to eligible veterans on a University listserv managed by the Veterans Affairs office.

As a large employer it was essential for UK to establish a consistent method of outreach to protected veterans. Over the past two years UK has partnered with advertising and outreach organizations to

distribute job opportunities beyond UK Jobs (University of Kentucky's online job board). These partnerships were designed to create an automated process to scrape UK Jobs nightly and re-distribute job opportunities to targeted job sites specifically recruiting veterans, individuals with disabilities and minorities.

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  - ◆ Specifically targeted websites for protected veterans included:
    - [www.veteransjobexchange.com](http://www.veteransjobexchange.com)
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  - ◆ This partnership also includes posting positions to Kentucky's state job board/Career Center.
- ❖ From July 1, 2016 to June 30, 2017, the University partnered with **OneClick (JobTarget)**.
  - ◆ Specifically targeted websites for protected veterans included:
    - [www.vetjobs.com](http://www.vetjobs.com)
    - [www.VeteransEnterprise.com](http://www.VeteransEnterprise.com)
    - [www.hireourheros.com](http://www.hireourheros.com)
    - [www.jofdav.com](http://www.jofdav.com)
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Although tracking the success of this online recruiting is challenging, the University proactively ask individuals to disclose "how they heard about the job opportunity". This advertising data is reviewed annually to ensure financial investments are positively impacting applicant pools as well as hiring metrics.

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### ***University Community of Inclusion***

- ❖ *The University of Kentucky is committed to a diverse and inclusive workforce by ensuring all our students, faculty, and staff work in an environment of openness and acceptance. We strive to foster a community where people of all backgrounds, identities, and perspectives can feel secure and welcome. We also value the well-being of each of our employees and are dedicated to creating a healthy place to work, learn and live. In the interest of maintaining a safe and healthy environment for our students, employees, patients and visitors the University of Kentucky is a Tobacco & Drug Free campus.*

*As an Equal Opportunity Employer, we strongly encourage veterans, individuals with disabilities, women, and all minorities to consider our employment opportunities.*

*Any candidate offered a position may be required to pass pre-employment screenings as mandated by University of Kentucky Human Resources. These screenings may include a national background check and/or drug screen.*

On a local level, UK has developed a working relationship with the local Veterans Employment Representative from the Kentucky Career Center. Human Resources also directly works with the Unemployment Office which is a division of the Kentucky Career Center to maintain open lines of communication and post job opportunities.

- ❖ **April 19, 2016** UK attended Frankfort Regional Career Fair, which had the first hour of the fair for veterans only.
- ❖ **August 4, 2016** UK registered, but was waitlisted for the “Hiring our Heroes” job fair.

As for communicating to contractors and subcontractors regarding the University’s commitment to provide equal employment opportunities to protected veterans, the below verbiage has been embedded in the General Terms and Conditions for every contract.

#### VEVRAA

- ◆ *This contractor and subcontractor shall abide by the requirements of 41 CFR 60-300.5(a). This regulation prohibits discrimination against qualified protected veterans, and requires affirmative action by covered prime contractors and subcontractors to employ and advance in employment qualified protected veterans.*

UK has also established a Supplier Diversity Procurement Program.

#### **ASSESSMENT OF EXTERNAL OUTREACH AND RECRUITMENT EFFORTS**

41 CFR§ 60-300.44 (f)(3)

To assist in meeting the Office of Federal Contract Compliance reporting and outreach requirements, the HR Employment Office purchased a variety of targeted job boards to advertise staff and faculty positions. These job boards includes JobTarget’s OneClick recruitment platform. JobTarget posts positions to Kentucky’s state job board as well as a vast network of job boards which include:

- ◆ VetJobs ([www.vetjobs.com](http://www.vetjobs.com))
- ◆ Veterans Enterprise ([www.VeteransEnterprise.com](http://www.VeteransEnterprise.com) )
- ◆ Be A Hero – Hire a Hero ([www.beahero-hireahero.com](http://www.beahero-hireahero.com))
- ◆ JOFDAV – Job Opportunities for Disabled American Veterans ([www.jofdav.com](http://www.jofdav.com))

- ◆ Disabled Person ([www.disabledperson.com](http://www.disabledperson.com))
- ◆ The Black Perspective ([www.blackperspective.com](http://www.blackperspective.com))
- ◆ Hispanic Today ([www.hispanic-today.com](http://www.hispanic-today.com))
- ◆ Women in Business & Industry ([www.wib-i.com](http://www.wib-i.com))
- ◆ Women For Hire ([www.womenforhire.com](http://www.womenforhire.com))

In addition to the unlimited postings on HigherEdJobs.com, the HR Employment Office purchased Affirmative Action (AA) e-mails that can be utilized with designated job postings. When an AA e-mail is used, an e-mail will be sent to approximately 250,000 job seekers featuring the job posting along with other postings from universities who are actively recruiting candidates in accordance with affirmative action or diversity plans.

The University has always invited applicants and employees to self-identify to their veteran status based on the VETS-100 report categories. Beginning September 2015, the University of Kentucky's operating system, SAP was updated to reflect the new VETS 4212-form which collects data based on the new protected veteran categories. Appendix AAP J reflects the analysis of disclosed protected veterans within the University of Kentucky workforce. Appendix AAP J can be located at [www.uky.edu/eo/federal-reporting](http://www.uky.edu/eo/federal-reporting).

The University needs to expand its outreach and recruitment efforts for protected veterans. Human Resource participation in job fairs directed at assisting protected veterans should be attended on a frequent basis along with meeting with state agencies that assists in providing employment resources for protected veterans.

## **DISSEMINATION OF POLICY**

41 CFR §60-300.44 (g)

### **Internal Dissemination**

- ❖ The Equal Opportunity Policy statement is posted in University employment offices, placement offices and other appropriate areas.
- ❖ The policy statement is included in all appropriate University publications including all employee handbooks and policy books, which are available to all employees on the web. New employees receive copies of the statement and other information about the University's policy of equal opportunity at orientation programs.
- ❖ Training sessions are conducted by the University's Office of Institutional Equity and Equal Opportunity with departments and colleges to highlight the University's commitment to diversity, equal opportunity and affirmative action. All new supervisors are required to attend discrimination and harassment training through SuperVision.

- ❖ The Office of Institutional Equity and Equal Opportunity conducts annual meetings with University officials to review their responsibility for effective implementation of the University's Equal Opportunity Policy.
- ❖ University brochures, newsletters, annual reports and other publications reiterate the University's commitment to equal opportunity.
- ❖ The equal opportunity policy is included in all purchase orders, requisitions, and contracts covered by Executive Order 11246 (as amended) and implementing regulations.

### **External Dissemination**

- ❖ The University communicates to prospective employees in all employment advertisements that it is an Equal Opportunity Employer.
- ❖ All contractors, subcontractors, vendors, and suppliers have been notified of the University's Equal Opportunity Policy and are required to comply with Executive Order 11246 (as amended) and its implementing regulations. The University has agreed to transact business only with firms adhering to these practices.
- ❖ All recruiting sources and other referral sources have been advised of the University's Equal Opportunity Policy.

### **AUDIT AND REPORTING SYSTEM**

41 CFR §60-300.44 (h)

The Office of Institutional Equity and Equal Opportunity is the office responsible for developing and managing the Affirmative Action Plan on an annual basis. Information and data for the affirmative action plan is collected from numerous departments throughout the University. The Human Resources Employment office is responsible for all outreach and recruitment initiatives brought on by the new federal regulations for protected veterans. The Office of Institutional Equity and Equal opportunity met with all levels of administration to inform them of the new regulations and the outreach effort initiatives. Although the regulations have been put in place there is still work to be done. For future auditing, the Office of Institutional Equity and Equal Opportunity needs to take a more active role in reviewing personnel activities to ensure such activities are free from discrimination and assists with outreach and recruitment efforts towards protected veterans. Through data collection and documentation, the Office of Institutional Equity and Equal Opportunity, needs to track the efforts that have been set-forth. The University will take all necessary action to bring the program into compliance. Although the Office of Institutional Equity and Equal Opportunity is responsible for the implementation of the AAP the responsibility is likewise vested with each administrator, department manager and supervisor.

## **RESPONSIBILITY FOR IMPLEMENTATION**

41 CFR §60-300.44 (I)

The Associate Vice President for Institutional Equity has been designated the University official to direct this and other affirmative action programs of the University of Kentucky.

### **Available for Inspection**

The written University of Kentucky Affirmative Action Plan (AAP), including the AAP for Veterans, in accordance with Executive Order 11246, Section 503 of the Rehabilitation Act of 1973, The Vietnam Era Veterans' Readjustment Assistance Act of 1974 (VEVRAA) and the Jobs for Veterans Act, may be viewed in the Office of Institutional Equity and Equal Opportunity. The AAP is available from 9:00am until noon and from 1:00pm until 4:00pm Monday through Friday when the University of Kentucky is officially in session. The AAP can also be viewed on the Office of Institutional Equity and Equal Opportunity website at [www.uky.edu/eoo/federal-reporting](http://www.uky.edu/eoo/federal-reporting). A hard copy of the plan is kept at the reference desk for checkout at the William T. Young Library.

## **BENCHMARK FOR HIRING**

41 CFR §60-300.45

The Department of Labor Office of Federal Contract Compliance Programs establishes a benchmark equaling the national percentage of veterans in the civilian labor force on an annual basis that federal contractors can use to measure progress. The current national percentage is 6.7 percent.

The University of Kentucky evaluates the University's workforce as a whole to assess veteran recruitment.

This analysis may be found for the University of Kentucky at AAP Appendix J at [www.uky.edu/eoo/federal-reporting](http://www.uky.edu/eoo/federal-reporting).

## **CONCLUSION**

The University of Kentucky Affirmative Action Plan as outlined in this document is put forth as evidence of the University of Kentucky's good faith efforts to meet all the requirements of a federal contractor as prescribed in Executive Order 11246, as amended, and as detailed in the implementing federal regulations 41 CFR § 60. This document reaffirms the University of Kentucky's commitment to equal opportunity as defined by federal and state statutes.

Furthermore, the University of Kentucky Affirmative Action Plan is reaffirmation of the University of Kentucky's commitment to equal opportunity for faculty, staff, students, and the greater community as defined by the Board of Trustees in the Governing Regulations and proffered as a supporting document to the University of Kentucky Strategic Plan.

This document was authored with information submissions from across the University of Kentucky, further demonstrating an institutional commitment to the value of equal opportunity in a major research and educational institution. The Office of Institutional Equity and Equal Opportunity, under the direction of the Associate Vice President for Institutional Equity, expresses appreciation to all individuals assisting in the preparation of the University of Kentucky Affirmative Action Plan.

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**To view the  
University of Kentucky  
Affirmative Action Plan  
Appendices**

**Visit:**

**<http://www.uky.edu/eo/federal-reporting>**