

UNIVERSITY OF
LOUISVILLE.

2017
Equal Employment
Opportunity /
Affirmative Action
Program

TABLE OF CONTENTS

Reaffirmation of Commitment to Equal Opportunity		<i>Preface</i>
General Purpose and Premise	[41 CFR §60-2.10]	1
Organizational Profile (Workforce Analysis)	[41 CFR §60-2.11]	2
Job Group Analysis	[41 CFR §60-2.13]	5
Availability Analysis	[41 CFR §60-2.14]	5
Utilization Analysis	[41 CFR §60-2.15]	7
Placement Goals	[41 CFR §60-2.16]	8
Understanding Under-Utilization		8
Additional Required Program Elements	[41 CFR §60-2.17]	9
Obligations regarding Special Disabled Veterans, Vietnam Era Veterans, & Individuals with Disabilities	[41 CFR §60-250 & §60-741]	11
Dissemination of AA and Diversity Plans		12
Conclusion		12

Enclosures

- I. Faculty Job Groups Incumbency v. Availability Detail
- II. 2016 Utilization by Job Group

Electronic Appendices

The following appendices are available in electronic format from the Office of Human Resources:

- AAP Element #1: Organizational Profile (Workforce Analysis)
- AAP Element #2: Job Group Analysis
- AAP Element #3: Placement Goals



**REAFFIRMATION OF COMMITMENT
TO EQUAL EDUCATIONAL & EMPLOYMENT OPPORTUNITY**

The University of Louisville is committed to and will provide equality of educational and employment opportunity for all persons regardless of race, sex, age, color, national origin, ethnicity, creed, religion, disability, sexual orientation, gender, marital status, pregnancy, veteran status, or political affiliation – except where sex, age, or ability represent bona fide educational or employment qualifications or where marital or veteran status are statutorily defined eligibility criteria for Federal or State benefit programs. Further, the university seeks to promote campus diversity by enrolling and employing a larger number of minorities and women where these groups have historically been and continue to be under-represented within the university in relation to availability and may extend preference in initial employment to such individuals among substantially equally qualified candidates, as well as to veterans.

This affirmation is published in accordance with 41 CFR 60 and is in keeping with Title VII & Title IX of the Civil Rights Act of 1964, as amended; Executive Order 11246; the Rehabilitation Act of 1973; the Vietnam Era Veterans' Readjustment Assistance Act of 1974; the Civil Rights Restoration Act of 1988 and Kentucky Statutes. The university aims to achieve, within all areas of the university community, a diverse student body, faculty, and staff capable of providing for excellence in the education of its students and for the enrichment of the university community.

STATEMENT ON DIVERSITY IN THE UNIVERSITY COMMUNITY

The University of Louisville strives to foster and sustain an environment of inclusiveness that empowers us all to achieve our highest potential without fear of prejudice or bias. We commit ourselves to building an exemplary educational community that offers a nurturing and challenging intellectual climate, a respect for the spectrum of human diversity, and a genuine understanding of the many differences-including race, ethnicity, gender, gender identity, sexual orientation, age, socioeconomic status, disability, religion, national origin or military status-that enrich a vibrant metropolitan research university. We expect every member of our academic family to embrace the underlying values of this vision and to demonstrate a strong commitment to attracting, retaining and supporting students, faculty and staff who reflect the diversity of our larger society.

UNLAWFUL HARASSMENT, PERSONAL DISCRIMINATION, AND RETALIATION

The University of Louisville's Discriminatory Harassment Policy reflects the commitment to maintain a community that is free from harassment of any kind. Harassment of any kind is not acceptable at the university. It is inconsistent with the university's commitment to excellence and respect for all individuals. The university is also committed to protecting the academic freedom and freedom of expression of all members of the university community. Academic freedom and freedom of expression includes, but is not limited to, the expression of ideas, however controversial, in the classroom, residence hall, and in keeping with different responsibilities, in work places elsewhere in the university community. The University of Louisville strives to provide equal employment opportunity on the basis of merit and without unlawful discrimination in terms of age, color, disability status, national origin, race, religion, sex, sexual orientation, or disability of an otherwise qualified individual. In addition, the university prohibits job discrimination of Vietnam era veterans, qualified special disabled veterans, recently separated veterans, and other protected veterans. The university shall make every reasonable effort to select all staff from applicant pools which are representative of the labor market in terms of sex, disability, minority, and veteran status. Furthermore, the university shall not subject employees to unlawful discrimination in terms of compensation, benefits, and/or working conditions.

For more information concerning ways in which our multicultural learning community may be nurtured and protected or complaint resolution procedures, contact the Office of Student Affairs, the Office of Human Resources, or the Office of Diversity.

**UNIVERSITY OF LOUISVILLE
2017 AFFIRMATIVE
ACTION PROGRAM**

As a federal contractor by virtue of its research and student financial aid programs subject to the provisions of Title 41 of the Code of Federal Regulations, Chapter 60, the University of Louisville (UofL) undertakes an annual evaluation of the representation of women and minorities among its employees in relation to the availability of women and minorities in the labor market as part of its broader Affirmative Action (AA) Program.

General Purpose and Premise [41 CFR §60-2.10]

An affirmative action program is a management tool designed to ensure equal employment opportunity. ***A central premise under-lying affirmative action is that, absent discrimination, over time an employer's work force will reflect the gender, racial, and ethnic profile of the labor markets in which the university recruits and selects.*** Affirmative action programs are based on a quantitative analysis of the employer's work force in relation to relevant labor markets, as documented in this report.

In the simplest of terms, the objective of the University's AA Program, over time, is for our ***work force to look just like the labor market*** – that is, for the representation of women and minorities at UofL to reflect their labor market availability, job group by job group.

Comments regarding Plan Year

For the 2017 plan year, the university has filed the AA plan on a calendar year basis, based on the fall 2016 Integrated Postsecondary Education Data System (IPEDS) report. The use of a calendar year plan is significantly preferable to a fiscal year plan for the purpose of AA planning for the following reasons:

- The fall data set extracted for IPEDS, on which a calendar year plan is based, is the most accurate data set available for faculty and professional staff and represents the single most common data set used for institutional reporting. To preclude confusion between or among various institutional reports, it is preferable for the AA plan to also be based on the fall institutional reporting data set, effective November 1 each year.
- The fall data set is inclusive of all the previous academic year's recruitment activity for both faculty and professional staff – presenting the clearest or most representative picture of progress the university may have made in the employment of women and minorities during the preceding year.
- A summer data set, by contrast, which is necessary for a fiscal year based plan, is the least representative since employees who have resigned or retired at the end of the previous academic term are deleted from the data set, while new hires have yet to be added.

Organizational Profile (Workforce Analysis) [41 CFR §60-2.11]

The simplest analysis undertaken in AA planning is to profile the university by identifying staffing patterns of women and minorities in the aggregate, among various employee complements, and among the departments and divisions of the institution **to identify whether women and minorities enjoy substantially equal access to employment throughout the organization** or whether barriers to equal employment opportunity exist within sectors of the organization – either by broad occupational categories or by organizational units.

Participation of Women and Minorities in Overall Institutional Growth

Generally, the annual AA plan tracks growth in the University’s workforce, then compares the proportional representation among women and minorities to ensure their growth among the university workforce remains proportional to growth in the workforce as a whole. Ideally, the university would track percentage representation for the total workforce from year to year, monitoring representation in each occupational category. In the 2017 plan, there will be a noticeable change in job groups in EEO H30 and EEO H50. This is due to the creation of seven new job groups in H50 – Technical Paraprofessional because of FLSA changes and the directive that non-exempt employees could not be listed in the H30 EEO category. Employees in the new H50 job groups were classified in various H30 job groups in the previous year’s plan.

2016 Representation of Women and Minorities			
EEO Code	EEO Category	Percent Women	Percent Minority
Total	All Employees	54.7%	25.0%
H10	Executives	41.4%	11.5%
H20	Faculty	41.6%	25.6%
H30	Professional	56.7%	23.8%
H40	Office Support	87.3%	16.8%
H50	Tech/Paraprofessionals	75.5%	21.5%
H60	Skilled Crafts	2.10%	14.0%
H70	Service Maintenance	25.0%	50.0%

Organizational Profile by Unit [41 CFR §60-2.11]

The organizational unit profile provides a limited, macro view of the representation of women and minorities by organizational unit. It does not reflect labor market availability or proportional representation. Rather, it represents a quick test as to whether there are organizational units that are void of the representation of women or minorities, provided the units are of sufficient size to create a statistical expectation of the representation of women or minorities. The University of Louisville consists of 341 organizational units. For the purpose of the organizational unit profile test, there is a statistical expectation for women and minorities to be represented on a random basis among units that consist of 30 or more members.

- In the 2016, women are represented in all units for which there is a statistical

expectation that women would be represented.

- In 2016, minorities are underrepresented in all but one organizational unit (Office of Communication and Marketing) for which there is a statistical expectation that minorities would be represented.

The chairs or directors of departments that are void of the representation of women or minorities, regardless of unit size, are encouraged to explore specific outreach initiatives in future recruitment processes to increase the diversity of applicant pools.

Job Group Definition [41 CFR §60-2.12]

A more sophisticated approach to evaluating the representation of women and minorities within the organization is **to divide the work force into job groups within occupational categories across organizational lines**. Job groups are defined **on the basis of similarity of job content, salary range, and opportunity for progression** within the organization.

At UofL, the definition of job groups comes from The Occupational Information Network (ONET). The ONET database contains information on hundreds of standardized and occupation-specific descriptors. It was created for the U.S. Department of Labor, Employment & Training Administration, and has detailed descriptions of the world of work for use by job seekers, workforce development and Human Resources (HR) professionals. UofL job groups are categorized into the seven Equal Employment opportunity (EEO) occupational categories listed below. The UofL categories Technical/Professional and Office Support are reverse of their EEO-6 counterpart due to historical coding structures.

Job Groups

H10 Officials & Managers

- 101 Chief Executives
- 102 Educational Executives
- 103 Executives

H20 Faculty

- 20A Biology
- 20B Chemistry
- 20C Communication
- 20D English
- 20E Fine Arts
- 20F Geography/Geoscience

- 20G History
- 20H Justice Administration
- 20I Mathematics
- 20J Modern Languages
- 20K Pan African Studies
- 20L Philosophy
- 20M Physics
- 20N Political Science
- 20O Psychology
- 20P Sociology
- 20Q Social Science
- 20R Urban & Public Affairs
- 20S Accountancy

20T Computer Info Systems
 20U Economics
 20V Finance
 20W Mgmt & Related Business Programs
 20X Marketing
 20Y Dentistry
 20Z Counseling & Psych Ed
 21A ED Leadership, Found & HR Ed
 21B Health & Physical Ed
 21C Teacher Education
 21D Engineering
 21E Law
 21F Library
 21G Biochemistry
 21H Diagnostic Radiology
 21I Health Specialties
 21J ICT & Oncology
 21K Medical
 21L Music
 21M Nursing
 21N Public Health & Info Science
 21O Social Work

H30 Professional Non-Faculty

301 Financial & Auditing Professionals
 302 Management & Other Analysts
 303 Buying & Purchasing Professionals
 304 Personnel & Training Professionals
 305 Higher Education Professionals
 306 Architect, Engineers & Surveyor
 307 Computer Professionals
 308 Natural & Math. Sci. Professionals
 309 Physician & Health Diag. Professionals
 310 Nurses
 311 Misc. Health Workers
 312 Counselors & Advisors
 313 Librarians, Archivists & Curators
 314 Psychologists & Social Workers
 315 Sports Professionals
 316 Writers & Editors
 317 Public Relations Specialists
 318 Clinical Lab Technologists

319 Electronic & Science Technology
 320 Misc. Professionals
 321 Academic Advisors
 322 Research Scholar Professionals
 800 Other Titles*

** Includes House Staff, Visiting Scholars and Post-Doctoral Fellows*

H40 Office Support

401 Receptionists & Clerks
 402 Administrative Support
 403 Administrative Support- Supervisors
 404 Accounting & Related Clerks

H50 Technical Paraprofessional

501 Lab Technicians
 502 Electrical & Science Technicians
 503 Library & Related Technicians
 504 Printing & Related Techs
 505 Health Service Technicians
 506 Academic Professionals**
 507 Administrative Paraprofessionals**
 508 Other Paraprofessionals**
 509 Research Supp/Resrch Lab Reltd Par**
 510 Health Related Paraprofessional*
 511 Computer Paraprofessional**
 512 Accounting/Finance Paraprofessional**

***New job groups in 2016*

H60 Skilled Crafts

601 Maintenance & Related Operation

H70 Service/Maintenance

701 Mail & Related Services
 702 Inventory & Related Services
 703 Custodial & Related Services
 704 Groundskeeping & Related Services
 705 Parking, Public Safety & Related
 706 Recreation & Related Workers
 707 Laborers

The more discrete definition of job groups among faculty and professional staff enables senior academic and administrative officers to have a clearer picture of where women and minorities are represented at UofL in relation to their availability in the labor market and will facilitate more targeted recruitment strategies in the future.

Job Group Analysis – Placement of Incumbents in Job Groups [41 CFR §60-2.13]

After defining appropriate job groups based on similarity of job content, salary range, and opportunity, the university then inventories employees by job group **to determine the percentages of women and minorities in each job group**. The university calculates the number and percentage of minority and women incumbents in each job group.

Availability Analysis – Estimating Labor Market Availability [41 CFR 60-2.14]

Availability is **an estimate of the number of qualified women and minorities available for employment** in a given job group, expressed as a percentage of all qualified persons available for employment. Commonly referred to as availability or labor market analysis, the purpose of this step in AA planning is **to form a valid basis for comparison** to determine whether the representation of women and minorities within the university reflects the diversity of the labor markets in which we recruit. The university must consider the following two factors in determining the availability of women and minorities, on a job group by job group basis, but remains at liberty to assign appropriate weights to each factor:

- The percentage of women or minorities with the requisite skills in the reasonable recruitment area;
- The percentage of women or minorities among those promotable, transferable, and trainable within the University.

Comments on Factor 1: Availability in Reasonable Recruitment Areas

The reasonable recruitment area is determined by where the university typically recruits candidates for vacancies in each job group. For executives, directors, and tenure track academic faculty, the university recruits nationally – so the reasonable recruitment area is based on the national labor market. For most professional non-faculty, technical/paraprofessional, and classified vacancies, the university recruits locally – so the reasonable recruitment area is the Louisville Metro Statistical area labor market.

Once the typical recruitment pattern is determined for each job group (as above) with job searches resulting from open and competitive recruitment, it is necessary to identify the actual labor market in which the university recruits and determine an appropriate data source documenting the availability of women or minorities in the relevant labor market. UofL utilizes national data sets that it believes are the most reliable for the various occupational categories, as indicated below:

- Executives (H10) are recruited nationally among the higher education labor market. UofL utilized the College and University Professional Association of Human Resources (CUPA-HR) *Administrative Compensation Survey for Senior Executives & Chief Functional Officers*. Availability of women and minorities for these occupational categories is surveyed every year by CUPA-HR.
- Faculty (H20) is recruited nationally among the higher education labor market. UofL utilizes Survey of Earned Doctorates (SEDS) data. Availability of women and minorities for the higher education market is surveyed every 10 years by the U.S. Census Bureau (SEDS).
- The Professional Non-Faculty (H30), Technical/Paraprofessional (H40), Office Support (H50), Skilled Crafts (H60), and Service/Maintenance (H70) employees are typically recruited locally or regionally in the Louisville Metropolitan Statistical area. Availability of women and minorities for these occupational categories is surveyed every 10 years by the U.S. Census Bureau, by detailed census occupation code.

For staff job groups, the university matches each job title within the job group to a detailed Census occupation code. Using PeopleClick AA planning software, we then extract labor market availability from the U.S. Census. For the 2017 plan year, 2010 Census data was utilized for labor market availability. Availability for each job group was then calculated by weighting the availability for each job title within the job group (in relation to the proportion of incumbents within the job group) to determine the final availability of women and minorities for each job group.

Statistical Caution: It is important to keep in mind that labor market availability data is refreshed on an irregular basis. For this reason, availability data (and resulting utilization data) may show variations from year to year based on new market data (as data sets are refreshed). Such variations are statistical in nature and do not reflect substantive changes in the relative utilization of women and minorities among the university's workforce.

Comments on Factor 2: Availability Within the Institution (Promotable, Transferable, & Trainable)

Some job groups rely more heavily than others on internal promotions – including officials & managers and senior faculty. However, most job groups are characterized by open and competitive recruitment in which internal candidates are evaluated on an equal footing with external candidates. This openness helps UofL attract the best qualified candidates in the Louisville Metropolitan Statistical area.

In the 2017 plan year, the availability factors for all job groups were weighted 100% for reasonable recruitment area and 0% for internal promotions or transfers.

Utilization Analysis – Comparing Incumbency to Availability [41 §CFR 60-2.15]

After determining work force percentages and availability percentages, the next step in the AA planning process, commonly referred to as utilization analysis, is ***to compare the work force percentages to the availability percentages to determine whether women and minorities at UofL are represented in proportion to their availability in the labor market.*** Under-utilization of women or minorities exists in a job group when the percentage of employees is less than the percentage that would reasonably be expected by their availability. The percentage of minorities or women in a particular job group is less than would reasonably be expected when the number of females or minorities in the job group is two standard deviations or more below the expected number.

The Office of Federal Contract Compliance Program’s (OFCCP) definition of under-utilization relies on a standard of reasonableness. Institutions may select among three recognized standards: the Any Difference Test, the 80% Test, and the Standard Deviations Test. The university utilizes the Two Standard Deviations Test. The Two Standard Deviation Test is based on the observation that some degree of departure from exact parity would occur even if the employer paid no attention at all to race or gender in placing people in jobs. Under this test, the percentage of minorities or women in a particular job group is less than would reasonably be expected when the number of females or minorities in the job group is two standard deviations or more below the expected number.

Placement Goals [41 CFR §60-2.16]

OFCCP guidelines require the university to establish placement goals wherever the work force percentage for women or minorities is considerably less than the availability percentage for each job group. Placement goals serve as objectives or targets for our succeeding recruitment processes that should be reasonably attainable by means of applying every good faith effort to reach out to qualified women and minority candidates in the labor market.

The OFCCP has moved entirely away from numeric goals, requiring only that placement goals be at least equivalent to the availability percentages for those job groups in which women or minorities are under-represented in relation to labor market availability. Current OFCCP guidelines emphasize that all affirmative action efforts must occur under the over-arching umbrella of equal consideration for every candidate, regardless of personal demographics, noting in particular that, “In all employment decisions, the (employer) must make selections in a nondiscriminatory manner.” [41 CFR §60-2.16(e) (2)]

UofL has adopted the following placement goals for women and minorities – representing the labor market availability percentage for women and minorities in those job groups where under-utilization has been identified. These goals commit the university to exercising all good faith efforts to recruit women or minorities in these job groups at rates which are at least equivalent to their availability in the labor market. Placement goals for women have been established for 18 out of 83 job groups, while placement goals for minorities have been

established for 4 out of 83 job groups.

Placement Goals for Women

Job Group	Category	Pct
20E	Fine Arts	75.4%
20Y	Dentistry	50.1%
21E	Law	63.1%
21H	Diagnostic Radiology	62.5%
21I	Health Specialties	62.5%
21K	Medicine	49.7%
21L	Music	49.3%
21N	Public Health & Info Science	74.9%
315	Sports Professionals	61.3%
319	Electronic and Science Technologist	50.0%
322	Research Scholar Professionals	50.0%
402	Administrative Support	92.0%
403	Administrative Support – Supervisor	96.2%
502	Electrical and Science Technicians	27.0%
503	Library and Related Technicians	74.9%
601	Maintenance and Related Operators	9.30%
701	Mail and Related Services	63.2%
705	Parking and Public Safety and Related Services	32.3%

Placement Goal for Minorities

Job Group	Category	Pct
20A	Biology	24.1%
21C	Teacher Education	23.4%
21K	Medical	38.4%

Understanding Under-Utilization – Through Numbers & Pictures

While the OFCCP requires that the university determine placement goals in terms of availability percentages for job groups in which women and minorities may be underutilized, the differing size and proportion of various job groups to the university’s work force as a whole often makes it difficult for administrators to comprehend how much work may be ahead of us to achieve labor market parity – or to recognize material progress when it occurs.

Although it is reasonable to compare work force and availability percentages from one AA plan year to the next, the 2016 plan will not be compared to last year’s plan due to the new job codes

created as a result of the Fair Labor Standards Act (FLSA) and the removal of non-exempt employees from the H30 EEO category to the H50 EEO category.

Numbers

The university translates the disparity between work force and availability percentages into ***the number of women or minorities that the university would actually need to hire to achieve parity with the labor market*** – given that the fundamental purpose of our AA Program, over time, is for the university’s work force to reflect the demographics of the labor markets in which we recruit.

To present data in meaningful form for those who relate to the actual numbers, the university prepares the *Incumbency v. Availability* report. This report provides the detailed inventory of the number and percentage of women and minorities in the workforce compared to labor market availability.

[See Enclosure I for Incumbency v. Availability Detail.]

Words

For those who relate more to language descriptions (rather than the numerical tabulations) the *Utilization Observations by Job Group* report offers a detailed narrative analysis regarding the utilization of women and minorities by EEO categories and by job groups. The *Utilization Observations By Job Group* provides a narrative of women and minorities in the workforce compared to labor market availability.

Additional Required Program Elements [41 CFR §60-2.17]

This section describes additional required elements of AA Programs, as specified at 41 CFR 60-2.17, which include: (a) ***designation of responsibility***, (b) ***identification of problem areas***, (c) ***action oriented-programs and other “good faith efforts,”*** and (d) ***internal audit and reporting system***.

Designation of Responsibility [41 CFR §60-2.17(a)]

The university president has assigned institution-wide responsibility to the Executive Director for Human Resources for implementation of the university’s equal employment opportunity and affirmative action program under 41 CFR §60 for all faculty, professional, and classified staff employees. In exercising as the institutional AA Officer, the Executive Director for Human Resources has direct access to all senior officers, as necessary, to ensure effective program implementation.

The Office of Human Resources is charged with responsibility of ensuring compliance with equal employment opportunity and affirmative action program policies related to recruitment and compensation programs.

Identification of Problem Areas [41 CFR §60-2.17(b)]

The principle strategy for identifying problem areas is included in the university's annual analysis of workforce percentages and availability percentages for the entire employee population as well as the identification of job groups in which women or minorities are under-represented at UofL in relation to labor market availability.

Action-Oriented Programs [41 CFR §60-2.17(c)]

OFCCP guidelines require that the university develop and execute action-oriented programs designed to correct problems areas and to attain established goals and objectives. Action-oriented programs may include substantive review of personnel policies or procedures which have previously produced inadequate results, or consist of good-faith efforts to remove identified barriers, expand employment opportunities, and produce measurable results.

The university president has assigned responsibility to the Office of Vice Provost for Diversity and International Affairs for fostering and sustaining an environment of inclusiveness that empowers all to achieve their highest potential without fear of prejudice or bias. The university is committed to building an exemplary educational community that offers a nurturing and challenging intellectual climate, a respect for the spectrum of human diversity, and a genuine understanding of the many differences of people that enrich a vibrant metropolitan research university including race, ethnicity, gender, gender identity, sexual orientation, age, socioeconomic status, disability, religion, national origin or military status.

The Vice Provost for Diversity and International Affairs works in collaboration with constituency groups including the Commission on the Status of Women, the Commission on Diversity and Racial Equality, Faculty & Staff for Human Rights (LGBT Association), Black Faculty & Staff Association, and the Latina/Latino Faculty & Staff Association, as well as the Faculty Senate, Staff Senate, and Academic Deans Council, to promote diversity and inclusion at the university.

Internal Audit and Reporting System [41 CFR §60-2.17(d)]

OFCCP guidelines require the university to develop and implement an auditing system that periodically measures the effectiveness of its affirmative action program, including the specific components addressed below:

1. ***Monitoring records of all personnel activity.*** The Executive Director for Human Resources is responsible for preparing an annual statistical analysis of workforce and labor market availability that strengthens the preparation of the university's AA Plan, as well as preparing adverse impact analyses used to identify potential problem areas including new hires, transfers and promotions, position reclassifications, involuntary separations, and appointment with tenure.

2. **Requiring internal reporting on a scheduled basis.** All AA related reports and assessment activities noted above are conducted at least annually on a calendar year basis, culminating in the publication of the university's annual AA Plan. The Executive Director for Human Resources, serving as the university's AA Officer, is responsible for ensuring that Human Resources undertakes the annual assessment of personnel activity (above) and that division, college, and school level annual reports, as well as planning, and assessment processes, include an assessment of equal opportunity issues pertaining to employment and student enrollment.
3. **Reviewing report results with all levels of management.** The Executive Director for Human Resources has immediate access to and will brief vice presidents and academic deans on report results. In addition, copies of the university's annual AA Plan are posted the university's website for ready access by all university community members.
4. **Advising senior officers on program effectiveness and recommending program improvements.** The Executive Director for Human Resources advises senior officers on program effectiveness and recommends program improvements for their respective areas of responsibility.

Obligations Regarding Special Disabled Veterans, Vietnam Era Veterans, and Individuals with Disabilities [41 CFR §60-250 & 741]

In accordance with the provisions of 41 CFR §60-250 and 41 CFR §60-741, the University of Louisville affirms that the obligations and commitments reflected in the university's AA Program shall be inclusive of, and expressly apply to, Special Disabled Veterans, Veterans of the Vietnam Era, and Individuals with Disabilities.

The University of Louisville will not discriminate because of an individual's status as a special disabled veteran, veteran of the Vietnam era, or individual with a disability and will take affirmative action to employ, and advance in employment, qualified special disabled veterans, veterans of the Vietnam era, and individuals with disabilities at all levels of employment, including the executive level.

With respect to physical and mental qualifications for employment, the University of Louisville expressly affirms that:

- The university will establish and adhere to a schedule for the periodic review of all physical and mental job qualifications to ensure job-relatedness for the position;
- Special disabled veterans and individuals with disabilities shall be afforded an opportunity to compete for vacant positions for which they are qualified, either with or without accommodation (without disclosing in advance of selection if accommodations could be required for successful job performance);
- Once selected for a position, special disabled veterans and individuals with disabilities may request accommodation(s) that would enable their successful job performance;

- The university shall provide all reasonable accommodations requested by special disabled veterans and individuals with disabilities to enable their successful job performance, without prejudice to the special disabled veteran or individual with a disability of any kind whatsoever.

All terms and conditions of employment including selection, promotion, compensation, benefits, training & professional development, opportunity for career progressions, and participation in all university activities, for special disabled veterans, veterans of the Vietnam era, and individuals with disabilities shall be identical in scope and nature to the terms and conditions of employment for all other employees.

Dissemination of AA and Diversity Plans

To promote awareness of our AA Program, the Office of Communications and Marketing is responsible for distributing a copy of the university's annual ***Reaffirmation of Commitment to Equal Employment and Educational Opportunity*** to all faculty, staff, and students.

The Executive Director for Human Resources (as the university EEO Officer) is responsible for presenting the ***AA Program Presentation*** to key university constituency groups including the Commission on the Status of Women, the Commission on Diversity and Racial Equality, the Faculty Senate, and the Staff Senate.

The Vice Provost for Diversity and International Affairs, working through diversity liaisons in each division, college, and school is responsible for ensuring the diversity issues are addressed in a systematic manner in the university's annual planning and assessment programs and for submitting the university's annual ***Diversity and Campus Climate Report*** to the Kentucky Council on Post-Secondary Education.

Conclusion

The University of Louisville reaffirms its commitment to equality of educational and employment opportunity in its relationships with all members of the university community and its commitment to the elimination of any documented historical and continuing under-utilization of women and minorities among the student body or employee complement. The University of Louisville is committed to this program and is aware that with its implementation, positive benefits will be received from the greater utilization and development of previously underutilized human resources.