

Affirmative Action Plan

Protected Veterans and Individuals with Disabilities

2023 Plan Year

01/01/2023-12/31/2023



**University of
Alabama System®**

THE UNIVERSITY OF ALABAMA
THE UNIVERSITY OF ALABAMA AT BIRMINGHAM
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AAP for Protected Veterans and Individuals with Disabilities

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AAP for Protected Veterans and Individuals with Disabilities

1. Policy Statement

It is the policy of The University of Alabama System Office (“System Office”) that equal employment opportunity is provided in the employment and advancement of all persons regardless of race, religion, color, national origin, sex, age, sexual orientation, gender identity and status as a protected veteran or individual with a disability including at the executive level. The System Office does not and will not discriminate against any applicant or employee regardless of race, religion, color, national origin, sex, age, sexual orientation, gender identity and status as a protected veteran and/or individual with a disability for any position for which the applicant or employee is qualified. In addition, the System Office is committed to taking affirmative action to employ and advance in employment qualified protected veteran employees. Such affirmative action will apply to all employment practices, including, but not limited to, hiring, upgrading, demotion or transfer, recruitment, recruitment advertising, layoff or termination, rates of pay or other forms of compensation, and selection for training, including apprenticeship and on-the-job training. Decisions related to personnel policies and practices will be made on the basis of an individual's capacity to perform a particular job and the feasibility of any necessary job accommodation. The System Office will make every effort to provide reasonable accommodations for any physical and mental limitations of individuals with disabilities and disabled veterans.

Employees and applicants will not be subjected to harassment, intimidation, threats, coercion or discrimination because they have engaged in or may engage in any activity protected by state, federal or local anti-discrimination laws including the following activities:

- a) Filing a complaint;
- b) Assisting or participating in an investigation, compliance evaluation, hearing, or any other activity related to the administration of the affirmative action provisions of the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended (VEVRAA), or any other federal, state or local law requiring equal opportunity for disabled veterans, recently separated veterans, active wartime or campaign badge veterans, or Armed Forces service medal veterans; Section 503 of the Rehabilitation Act of 1973, as amended (Section 503); or any other federal, state or local law requiring equal opportunity for disabled persons;
- c) Opposing any act or practice made unlawful by VEVRAA or its implementing regulations or any other federal, state or local law requiring equal opportunity for disabled veterans, recently separated veterans, active wartime or campaign badge veterans, or Armed Forces service medal veterans; Section 503 or its implementing regulations; or any other federal, state or local law requiring equal opportunity for disabled persons; or
- d) Exercising any other right protected by VEVRAA or Section 503 or their implementing regulations.

Our obligations in this area stem from not only adherence to various state and federal regulations, but also from our commitment as an employer in this community to provide job opportunities to all persons regardless of race, religion, color, national origin, sex, age, sexual orientation, gender identity or status as a protected veteran or an individual with disability. The System Office's EEO

and affirmative action obligations are fully supported by the Chancellor for The University of Alabama System.

The System Office will also continually implement and update audit and reporting systems that measure the effectiveness of the AAP, identify the need for remedial actions, determine if objectives were attained, and determine if opportunities to participate in employer-sponsored activities were extended to all employees and applicants.

If you have any questions regarding our equal employment opportunity or harassment policies or complaint procedures, you may contact the Department of Human Resources.

Jon Garner
Assistant Vice Chancellor for Human Resources

The University of Alabama System Office is fully committed to principals of equal employment opportunity and affirmative action. As Chancellor, I support the successful implementation of the System Office's Affirmative Action Programs. I have appointed the Director of System Benefits and Human Resources Services, Affirmative Action Officer for the System Office, with responsibility for implementation of the System Office's affirmative action activities. The Affirmative Action Officer has the full support of top management and the staff necessary to fully implement this Program. All managers and supervisors will take an active part in the System Office's AAP to ensure all qualified employees and prospective employees are considered and treated in a nondiscriminatory manner with respect to all employment decisions. Furthermore, the University of Alabama System Office will solicit the cooperation and support of all employees for the System Office's Equal Employment Opportunity and Affirmative Action Policy.

Finis E. St. John IV
Chancellor, The University of Alabama System

2. Review of Personnel Processes

To ensure that all personnel activities are conducted in a job-related manner which provides and promotes equal employment opportunity for all known protected veterans and employees and applicants with disabilities, reviews are periodically made of our examination and selection methods to identify barriers to employment, training, and promotion.

- The System Office periodically conducts a review of its employment processes to ensure thorough and systematic consideration of the job qualifications of 1) known protected veteran applicants and employees and 2) applicants and employees with disabilities for job vacancies filled either by external hiring or internal promotions/transfers, as well as for all training opportunities available.
- The System Office ensures that its personnel processes do not stereotype individuals with disabilities or protected veterans in a manner which limits their access to jobs for which they are qualified.
- The System Office ensures that applicants and employees with disabilities have equal access to its personnel processes, including those implemented through information and communication technologies.
- The System Office provides reasonable accommodations for applicants and employees with disabilities, unless such accommodations will cause undue hardship, to ensure that equal employment opportunity is extended in the operation of its personnel processes.
- The System Office ensures that its information and communications systems are accessible to all employees and applicants with disabilities, even in the absence of a specific request for accommodation.

3. Physical and Mental Qualifications

To ensure that all physical and mental qualifications and requirements are job-related, reviews are periodically made of these qualifications and requirements as they relate to employment, training, and promotion.

The physical and mental job requirements are reviewed to determine whether or not they are job-related and consistent with business necessity and safe performance on the job. This review is done as position descriptions are created or updated.

Schedule for Review: Any previously reviewed classification will be reviewed again if there is a change in working conditions that affects the job's physical or mental requirements (e.g., new requirements, new equipment, etc.)

4. Reasonable Accommodation to Physical and Mental Limitations

The System Office will make every effort to provide reasonable accommodations for the physical and mental limitations of applicants and employees with disabilities or who are disabled veterans unless it can demonstrate that the accommodations would impose an undue hardship on the operation of business. Such reasonable accommodations are provided in our electronic and/or online application systems. The System Office ensures that qualified applicants and employees with disabilities, who are unable to fully utilize the system, are provided equal opportunities to apply and be considered for all jobs. The System Office will also confidentially review performance issues involving employees with known disabilities to determine whether a reasonable accommodation is needed when: 1) the employee is having significant difficulty with job performance, and 2) it is reasonable to conclude that the problem is related to the known disability.

Employees may also contact the following at any time to formally request an accommodation:

Name: Jessica Harrison
Director of Human Resources
205-348-9506
jharrison@uasystem.edu

5. Harassment

The System Office has developed and implemented a set of procedures to ensure that its employees with disabilities and protected veterans are not harassed due to those conditions. A copy of the discrimination, sexual harassment, and related retaliation policy, which includes the prohibition of harassment of individuals with disabilities or protected veterans, is available for distribution to new as well as to existing employees. All new employees are required to complete online nondiscrimination training as part of the new employee onboarding process and every two years thereafter.

6. External Dissemination of Policy, Outreach and Positive Recruitment

Based upon the System Office's review of its personnel policies as described in Section 2, the following activities will be implemented or continued to further enhance our affirmative action efforts. All activities are the responsibility of the Director, Human Resources.

- The System Office statement on equal opportunity and affirmative action is communicated to all prospective employees through its inclusion on job postings and the official application for employment.
- On-site tours and meetings are available as an outreach to interested individuals, veteran's organizations and representatives, and rehabilitation agencies to familiarize their advisers and job coaches of physical features of the workplace and related job requirements.
- Additional outreach efforts will be made as needed to meet the benchmarks established for hiring protected veterans and the utilization goals for individuals with disabilities.

7. Internal Dissemination of Policy

In order to gain positive support and understanding for the affirmative action program for protected veterans and individuals with disabilities, the System Office will implement or continue to implement the following internal dissemination procedures, all of which are the responsibility of the Director, Human Resources. The following procedures are designed to foster support and understanding from our executive staff, management, supervisors, and other employees in an effort to encourage all employees to take the necessary actions to aid us in meeting our obligations.

- The System Office's Chief Executive Officer distributes written communication of reaffirmation of commitment to affirmative action annually to all employees. This memorandum is also available on System Office's website.
- Ensure the policy is included as part of employee orientation programs.
- The Affirmative Action plan is available on the System Office's website.
- Director, Human Resources provides the Chief Executive Officer and appropriate managers and supervisors with updates on equal opportunity progress within their relevant departments, divisions, and offices as needed. State and federal EEO posters are placed at all the System Office's locations.

8. Auditing and Reporting System

The System Office has developed and currently implements an audit and reporting system that addresses the following:

- Measures the effectiveness of our overall affirmative action program.
- Indicates the need for remedial action.
- Measures the degree to which our affirmative action objectives are being met.
- Identifies any undue hurdles for individuals with disabilities and protected veterans with regard to employer sponsored educational, training, recreational, and social activities. This will also include, but is not limited to, reviewing the on-line and electronic application system to determine its accessibility, and ensuring that procedures to request accommodations are prominently displayed and that individuals with disabilities can readily obtain the needed reasonable accommodation.

9. Responsibility for Implementation

The Chancellor has ultimate responsibility for the success of the affirmative action program. As part of its efforts to ensure equal employment opportunity to protected veterans and individuals with disabilities, the Chancellor has delegated specific authority and responsibility for affirmative action to the Director, Human Resources.

Managers and supervisors share in the responsibility for implementation.

- Individual departments share the administrative responsibilities of day-to-day implementation of the program.
- All positions for which external candidates are considered are posted and advertised.
- The Director, Human Resources is responsible for reviewing staff appointment recommendations for conformity to affirmative action guidelines and equal opportunity requirements.
- The Director, Human Resources ensures that staff holding supervisory and managerial positions are aware that their work performance is being evaluated in part on the basis of their equal employment opportunity efforts.
- The Director, Human Resources provides guidance to supervisors and managers in taking proper action to prevent employees from being harassed in any way; through one-on-one contact, training, and/or disciplinary action.

10. Training

The System Office trains all employees involved with the recruitment, selection, promotion, discipline, training, and related personnel processes of individuals with disabilities or protected veterans to ensure compliance with affirmative action goals.

11. Data Collection Analysis

The System Office has adopted the current national percentage of veterans in the civilian labor force of 5.9% as its hiring benchmark for protected veterans. The System Office will update its hiring benchmark as new data is published and/or updated by the Office of Federal Contract Compliance Programs (OFCCP), U.S. Department of Labor.

The System Office also adopted the current national utilization goal of 7.0% for qualified individuals with disabilities. The System Offices will update its utilization goal as new data is published and/or updated by OFCCP. The 7.0% utilization goal is applied to each job group within the System Office.

Goals and/or benchmarks do not require that the System Office hire, promote, train, and/or retain a specified number of individuals with disabilities and/or protected veterans. These goals/benchmarks are not rigid and inflexible quotas which must be met but are instead targets that are reasonably attainable by means of applying good faith efforts to make all aspects of the entire AAP work. A goal is a guidepost against which the System Office, a community group, or a compliance agency can measure progress in meeting affirmative action goals and benchmarks.

12. Compensation

It is the policy of the System Office that when offering employment or promotion to protected veterans or individuals with disabilities, the amount of compensation offered will not be reduced because of any disability income, pension, or other benefit the applicant or employee receives from another source.

The System Office is also committed to abiding by the Pay Transparency Nondiscrimination Provisions. Employees or applicants who have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant will not be discharged or in any other manner be discriminated or retaliated against. Employees who have access to the compensation information of other employees or applicants as part of their essential job functions are informed and trained to not disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) a response to a formal complaint or charge; (b) in furtherance of an investigation, proceeding, hearing, or action; or (c) consistent with the System Office's legal duty to furnish the information.