

## **AFFIRMATIVE ACTION PLAN (AAP)**

for

Washington State University  
100 Dairy Rd.  
Pullman, WA 99164  
509-335-8288

All WSU Locations

January 1, 2022-December 31, 2022

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### **PART I: AAP FOR MINORITIES AND WOMEN**

### **PART II: AAP FOR PROTECTED VETERANS AND INDIVIDUALS WITH DISABILITIES**

**AA/EEO Contact:** Holly Ashkannejhad  
Director of WSU Compliance and Civil Rights  
Washington State University  
100 Dairy Rd.  
Pullman, WA 99164  
509-335-8288

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This AAP contains confidential information which is subject to the provisions of 18 U.S.C. 1905. Chrysler Corp. v. Brown, 441 U.S. 281, 19 FEP 475 (1979).

Copies of this AAP and all related appendices, documents, and support data are made available on loan to the U.S. Government upon the request of said Government on the condition that the Government hold them totally confidential and not release copies to any persons whatsoever. This AAP and all its supporting documents contain much confidential information which may reveal, directly or indirectly, WSU's plans for business or geographical expansion or contraction. WSU considers this AAP to be exempt from disclosure, reproduction, and distribution under the Freedom of Information Act upon the grounds, among others, that such material constitutes (1) personnel files, the disclosure of which would constitute a clearly unwarranted invasion of personal privacy, which are exempt from disclosure under 5 U.S.C. 552(b)(6); (2) confidential, commercial, or financial information, which is exempt from disclosure under 5 U.S.C. 552(b)(4); (3) investigatory records compiled for law enforcement purposes, the production of which would constitute an unwarranted invasion of personal privacy, which are exempt from disclosure under 5 U.S.C. 552(b)(7)(C); and (4) matters specifically exempted from disclosure by statute, which are exempt from disclosure under 5 U.S.C. 552(b)(3). Notice is hereby given of a request pursuant to Title 41 Code of Federal Regulations, Part 60-40.3 that portions of this AAP be kept confidential.

WSU wishes to make it clear that it does not consent to the release of any information whatsoever contained in this AAP under the Freedom of Information Act or otherwise. If the U.S. Government, or any agency or subdivision thereof, is considering breaching the conditions under which this AAP was loaned to such Government, or is considering a request for release of this AAP under the Freedom of Information Act, a request is hereby made that the Government immediately notify the President of WSU of any and all Freedom of Information Act requests received by the Government or any other contemplated release of this AAP by the Government which relates to information obtained by the Government from WSU. We further request that everyone who has any contact with this AAP, or its supporting data, treat such information as totally confidential and that such information not be released to any person whatsoever. Retention or disclosure of information relating to identifiable individuals may also violate the Privacy Act of 1974.

**WSU AAP FOR  
All WSU Locations**

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## **INTRODUCTION TO PARTS I AND II**

### **BACKGROUND**

Washington State University (WSU) is a public land grant university with Fall 2020 undergraduate student enrollment of 25,470 and graduate student enrollment of 3,164. WSU operates campuses across Washington State including WSU Pullman, WSU Everett, WSU Spokane, WSU Tri-Cities, WSU Vancouver, and WSU Global Campus (offering online courses and degree programs). Additionally, WSU operates Extension and/or research programs in every county in Washington. WSU was founded in 1890 with the mission of advancing knowledge through creative research and scholarship across a wide range of academic disciplines; extending knowledge through innovative educational programs in which emerging scholars are mentored to realize their highest potential and assume roles of leadership, responsibility, and service to society; and applying knowledge through local and global engagement that will improve quality of life and enhance the economy of the state, nation, and world.

WSU is a federal government supply and service contractor subject to the affirmative action requirements of Executive Order 11246, the Rehabilitation Act of 1973 as amended, and the Vietnam Era Veterans' Readjustment Assistance Act of 1974, Section 4212. Because WSU has \$50,000 or more in annual contracts with the federal government and employs 50 or more employees, we are required to prepare annual written Affirmative Action Plans (AAP's) for minorities and women, for protected veterans, and for individuals with disabilities for our organization. Failure to comply with these laws and their implementing regulations, which are enforced by the Office of Federal Contract Compliance Programs (OFCCP), can result in debarment of WSU from future contracts and subcontracts.

Affirmative action is a term that encompasses any measure adopted by an employer to correct or to compensate for past or present discrimination or to prevent discrimination from recurring in the future. Affirmative action goes beyond the simple termination of a discriminatory practice.

As stipulated in federal regulations, a prerequisite to the development of a satisfactory affirmative action plan is the evaluation of opportunities for protected group members, as well as an identification and analysis of problem areas inherent in their employment. Also, where a statistical analysis reveals a numeric disparity between incumbency and availability (and/or hiring rates for veterans), an adequate AAP details specific affirmative action steps to guarantee equal employment opportunity. These steps are keyed to the problems and needs of protected group members. For minorities and women, such steps include the development of hiring and promotion goals to rectify the disparity between incumbency and availability. For protected veterans and individuals with disabilities, such steps will include a thorough review of the company's outreach efforts to determine the effectiveness of such efforts in closing the hiring and/or utilization gaps. It is toward this end that the following AAP of WSU was developed.

## **APPLICABLE AFFIRMATIVE ACTION LAWS AND REGULATIONS**

WSU's AAP for minorities and women (Part I) has been prepared according to Executive Order No. 11246, as amended, and Title 41, Code of Federal Regulations, Part 60-1 (Equal Employment Opportunity Duties of Government Contractors), Part 60-2 (Affirmative Action Programs of Government Non-Construction Contractors; also known as "Revised Order No. 4"), and Part 60-20 (Sex Discrimination Guidelines for Government Contractors).

WSU has developed separately an affirmative action plan for protected veterans and individuals with disabilities (Part II) prepared in accordance with the Rehabilitation Act of 1973, Section 503, as amended and Title 41, Code of Federal Regulations, Part 60-741 (Affirmative Action Program for Individuals with Disabilities), the Vietnam Era Veterans' Readjustment Assistance Act of 1974, Section 4212 as amended, and Title 41 Code of Federal Regulations, Part 60-300 (Affirmative Action Program for protected veterans).

Under Section 503, a business with a federal contract of more than \$15,000 is required to treat qualified individuals with disabilities without discrimination on the basis of their physical or mental disability in all employment practices, and to take affirmative action to employ and advance in employment individuals with disabilities. If the company has at least 50 employees and a single contract of \$50,000 or more, then it must also develop a section 503 AAP, as described in 41 CFR 60-741, Subpart C. Section 503 applies to business with federal construction contracts, but not to business with federally assisted construction contracts.

Under VEVRAA, a business with a federal contract of \$140,000 or more is required to treat qualified individuals without discrimination based on their status as a protected veteran in all employment practices, and to take affirmative action to employ and advance in employment protected veterans. If the company has at least 50 employees and a single contract of \$150,000 or more, then it must also develop a VEVRAA AAP, as described in 41 CFR 60-300, Subpart C. VEVRAA applies to business with federal construction contracts, but not to businesses with federally assisted construction contracts.

## **COVERED GROUPS UNDER AFFIRMATIVE ACTION LAWS AND REGULATIONS**

Coverage under affirmative action laws and regulations applies to:

Women, and minorities who are recognized as belonging to or identifying with the following race or ethnic groups: Blacks/African Americans, Hispanics/Latinos, Asians, Hawaiians or Other Pacific Islanders, American Indians/Alaskan Natives, and Two or More Races.

Any veteran who is entitled to compensation (or who but for the receipt of military retired pay would be entitled to compensation) under laws administered by the Secretary of Veterans Affairs, or who was discharged or released from active duty because of a service- connected disability.

Recently separated veterans: any veteran currently within three-years of discharge or release from active duty.

Veterans who served on active duty in the U.S. military during a war or campaign or expedition for which a campaign badge is awarded.

Veterans who, while serving on active duty in the Armed Forces, participated in a United States military operation for which an Armed Forces service medal was awarded pursuant to Executive Order 12985.

An individual with a disability: 1) a person who has a physical or mental impairment that substantially limits one or more of his/her major life activities; (2) has a record of such impairment, or (3) is regarded as having such an impairment.

This plan is in accordance with the above coverage; however, WSU recognizes that the categorizations required by federal regulation do not encompass the rich and diverse identities of our community. For example, federal regulations do not provide for capturing information relating to non-binary status. Similarly, the federal regulations do not capture nuances about race, sexual orientation, or other characteristics or traits which provide unique experiences to our community. Thus, it is important to denote that although this coverage does not capture this broad spectrum of experiences, WSU recognizes and supports individuals who do not identify with constructs listed above. WSU also recognizes and supports individuals who may experience discrimination based on protected class categories described in Executive Policy 15, the WSU Policy Prohibiting Discrimination and Harassment.

## **PROGRAM TERMINOLOGY**

The terms, “comparison of incumbency to availability,” “deficiency,” and “problem area,” appearing in this AAP, are terms WSU is required by government regulations to use. The criteria used in relation to these terms are those specified by the government. These terms have no independent legal or factual significance whatsoever. Although WSU will use the terms in total good faith in connection with its AAP, such use does not necessarily signify that WSU agrees that these terms are properly applied to any particular factual situation and is not an admission of non-compliance with EEO laws, regulations, and objectives.

The comparison of incumbency to availability contained herein is required by government regulations to be based on certain statistical comparisons. Geographic areas and sources of statistics used herein for these comparisons were used in compliance with government regulations, as interpreted by government representatives. The use of certain geographic areas and sources of statistics does not indicate WSU’s agreement that the geographic areas are appropriate in all instances of use or that the sources of statistics are the most relevant. The use of such geographic areas and statistics may have no significance outside the context of this AAP. Such statistics and geographic areas will be used, however, in total good faith with respect to this AAP.

The grouping of job titles into a given job group does not suggest that WSU believes the jobs so grouped are of comparable worth.

Whenever the term “goal” is used, it is expressly intended that it “should not be used to discriminate against any applicant or employee because of race, color, religion, gender, or national origin,” as stated in Title 41 Code of Federal Regulations, Part 60-2.16(e)(2).

This AAP is not intended to create any contractual or other rights in any person or entity.

## **RELIANCE ON EEOC’S GUIDELINES**

Although WSU does not believe any violation of Title VII of the Civil Rights Act exists, it has developed this AAP in accordance with and in reliance upon the EEOC’s Guidelines on Affirmative Action, Title 29 Code of Federal Regulations, Part 1608.

## **REPORTING PERIOD**

This AAP is designed to cover the following reporting period,

- AAP implementation period: January 1, 2022, through December 31, 2022
- Transaction period: October 1, 2020, through January 31, 2022.

## STATEMENT OF PURPOSE FOR PARTS I AND II

This AAP has been designed to bring women and men, members of minority groups, protected veterans, and individuals with disabilities into all levels and segments of WSU's workforce in proportion to their representation in the qualified relevant labor market.

The AAP, therefore, is a detailed, results-oriented set of procedures which, when carried out, results in full compliance with equal employment opportunity requirements through the equal treatment of all people.

The manner in which this is to be accomplished becomes technical and somewhat complicated. There are several reasons for this. First, WSU is subject to and must address a variety of State and Federal laws and guidelines dealing with equal employment opportunity and affirmative action. These guidelines and requirements are in themselves somewhat technical and complex. In addition, relevant court decisions, which are often useful in interpreting, but some-times conflicting with these requirements and guidelines, must be taken into account when developing and implementing the AAP. Furthermore, in determining WSU's current equal employment opportunity and affirmative action position and its desired future achievements, numbers, percentages, statistics, and numerous calculations and computations must come into play.

The technical, legal, and mathematical aspects of the AAP, however, all have one common purpose—to allow us to properly identify three key concepts:

1. Where we stand now,
2. Where we must go,
3. How best to get there.

These three concepts are the Affirmative Action Plan.



# **Washington State University**

**All WSU Locations**

**PART I: AFFIRMATIVE ACTION PLAN FOR MINORITIES AND WOMEN**

**FOR**

**January 1, 2022 - December 31, 2022**

**PART I**  
**AAP FOR MINORITIES AND WOMEN**  
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## **PART I: AAP FOR MINORITIES AND WOMEN**

### **CHAPTER 1: ORGANIZATIONAL PROFILE**

#### **41 C.F.R. § 60-2.11**

##### **Workforce Analysis/Lines of Progression**

WSU has created a workforce profile to identify employees at All WSU Locations by gender and race/ethnicity (as defined by the federal requirements) in each job title. The data was collected from payroll records dated January 31, 2022.

Job titles are listed by organizational unit. Job titles are listed from lowest to highest paid. The list includes all job titles, including Civil Service, Administrative Professional, and Faculty employees.

For each job title, WSU identified the total number of employees, the number of male and female employees, the total number of minority employees, the male and female minority employees, the total number of employees who are White, Black, Hispanic, Asian, American Indian or Alaskan Native employees, Native Hawaiian or Pacific Islander, and Two or More races, and the male and female employees within each of these race/ethnic groups.

##### **Lines of Progression**

WSU does not have formal lines of progression; therefore, job titles are listed by organizational unit in order of wage rates (41 C.F.R. § 60-2.11(c)(3)).

See the Workforce Analysis for the results per organizational unit.

## **CHAPTER 2: JOB GROUP ANALYSIS**

### **41 C.F.R. § 60-2.12**

Although the workforce analysis was conducted individually for every job title, after it was completed, job titles were grouped for the comparison of incumbency to availability and for setting goals. There were several reasons for grouping jobs.

Many job titles are so similar in content that handling them individually in the AAP is not necessary. Grouping together these very similar titles is appropriate for the comparison of incumbency to availability. For many job titles, the availability data that can be collected is limited, and the same data must be used for several related jobs. Therefore, grouping these related titles together is logical. Also, many job titles have so few incumbents in them that identifying disparities between incumbency and availability by job title is meaningless—as problem areas would be identified in terms of fractions of people. By grouping several similar titles and increasing the number of employees involved, a meaningful comparison can be conducted; any identified problem areas are more likely to be in terms of whole people. Consequently, goals established to correct problem areas are also more likely to be in terms of whole people.

The three reasons for grouping job titles all discuss "similar" or "related" jobs. That is the most critical guideline in creating job groups. Above all, the job titles placed into a job group must be more similar or related to each other than the job titles in other job groups.

Job groups must have enough incumbents to permit meaningful comparisons of incumbency to availability and goal setting. Ideally, if a job group is identified as containing a problem area, it should be large enough that a goal of at least one whole person can be established. No minimum size has been established for this purpose, however, since it is dependent not only on the size of the job group, but also on the size of the availability percentage and the number of minorities or women already employed in the job group.

WSU did not combine job titles with different content, wages, or opportunities if doing so would have obscured problem areas (e.g., job groups which combine jobs in which minorities or women are concentrated with jobs in which they are underrepresented).

**CHAPTER 3: PLACEMENT OF INCUMBENTS IN JOB GROUPS**  
**41 C.F.R. § 60-2.13**

Each job group appears on a Job Group Report with a job group name and number. The report lists each job title in the job group. For each job title, the worksheet provides the following information: EEO reporting category, job title, employee headcounts for each job title, and overall percentages by gender and race/ethnicity as of January 31, 2022.

See the Job Group Analysis for the listing of the job titles and the associated race and gender headcounts per job group.

**CHAPTER 4: DETERMINING AVAILABILITY**  
**41 C.F.R. § 60-2.14**

"Availability" is an estimate of the proportion of each sex and race/ethnic group available and qualified for employment at WSU for a given job group in the relevant labor market during the life of the AAP. Availability indicates the approximate level at which each race/ethnic and sex group could reasonably be expected to be represented in a job group if WSU's employment decisions are being made without regard to gender, race, or ethnic origin. Availability estimates, therefore, are a way of translating equal employment opportunity into concrete numerical terms. Correct comparisons of incumbency to availability, worthwhile and attainable goals, and real increases in employment for problem groups depend on competent and accurate availability analyses. With valid availability data, we can compare the percentages of those who could reasonably be expected to be employed versus our current employment (from the workforce analysis), identify problem areas or areas of deficiency, and establish goals to correct the problems.

Steps in Comparison of Incumbency to Availability

Identify Availability Factors

The following availability factors are required of federal government contractors for consideration when developing availability estimates for each job group:

1. External Factor: The external requisite skills data comes from the 2014-2018 American Community Survey (ACS) Census of Population data.
  - A. Reasonable labor area:

<b>Job Group</b>		<b>Recruitment Area</b>
10	Central Administration	National
11	Administration I	National
12	Administration II	National/State
13	Administration III	National/State
20	Dept/Program Chair or Director	National
21	Instructional Faculty	National
22	Research Faculty	National
30	Student Affairs	State/Local
31	Publications/Comm/PR/Development	State/Local
32	Science & Health	State/Local
33	Computer Specialist	State/Local
34	Financial Specialists	State/Local
35	Engineers and Architects	State/Local
36	Other Professional Non-Faculty	State/Local
37	Coaches	National
38	Librarians	National
39	Extension Specialists	State/Local
40	Administrative Support	State/Local

<b>Job Group</b>		<b>Recruitment Area</b>
41	Secretaries and Assistants	Local
42	Finance Records Assistants	State/Local
43	Librarian Assistants	Local
51	Electronic/Engineering Technicians	State/Local
53	Ag/Biology/Field Technicians	State/Local
54	Other Technicians	State/Local
60	Mechanics and Repairers	State/Local
61	Construction	State/Local
62	Other Crafts	State/Local
71	Operators	State/Local
72	Police/Security	State/Local
73	Food Services	Local
74	Custodial Services	Local
75	Farm/Grounds Workers	Local
76	Other Service/Maintenance Workers	Local

2. Internal Factor: The percentage of minorities or women among those promotable, transferable, and trainable within the contractor's organization. See the Internal Availability Analysis for more detail.

Assign Internal and External Factor Weights: Weights were assigned to each factor for each job group. A combination of historical data and experience were used to determine the weights.

Weights were never assigned in an effort to hide or reduce problem areas.

Identify Final Availability: Weights were multiplied by the component-specific data to produce weighted data for each component. Weighted data for each component was summed. This produced a final availability estimate for each sex and race/ethnic group, as well as for minorities in the aggregate.<sup>1</sup>

See the **Availability Analysis** for the availability breakdown for each job group.

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<sup>1</sup> In most cases, the final availability report (and most other technical reports in this AAP) only includes data/information for females and minorities in the aggregate.

**CHAPTER 5: COMPARING INCUMBENCY TO AVAILABILITY**  
**41 C.F.R. § 60-2.15**

Once final availability estimates were made for each job group, WSU compared the percentage of incumbents in each job group to their corresponding availability. A comparison was made between the percentage employed as of January 31, 2022 and that group's final availability.

See the ***Comparison of Incumbency to Availability*** for the results per job group.



## CHAPTER 6: PLACEMENT GOALS

### 41 C.F.R. § 60-2.16

WSU has established an annual percentage placement goal whenever it found that minority or female representation within a job group was less than would reasonably be expected given their availability. In each case, the goal was set at the availability figure derived for women and/or minorities, as appropriate for that job group. These goals take into account the availability of basically qualified persons in the relevant labor area. They also take into account anticipated employment opportunities with our organization. Goals are not rigid and inflexible quotas which must be met, but are instead targets reasonably attainable by means of applying every good faith effort to make all aspects of the entire AAP work. These goals will be reached primarily through recruiting and advertising to increase the pool of qualified minority and female applicants and through implementation of our action-oriented programs (see Chapter 9). Selections will occur only from among qualified applicants. Goals do not require the hiring of a person when there are no vacancies or the hiring of a person who is less likely to do well on the job ("less qualified") over a person more likely to do well on the job ("better qualified"), under valid selection procedures. Goals do not require that WSU hire a specified number of minorities or women.

A goal is a guidepost against which WSU, a community group, or a compliance agency can measure progress in remedying identified deficiencies in WSU's workforce. By setting realistic goals, WSU should be able to meet the goals, assuming we conduct effective recruitment and advertising efforts to ensure an adequate pool of qualified minority and/or female applicants.

See the **Placement Goals** report for each job group and the **Goals Progress Report** for progress made since the previous AAP.

**CHAPTER 7: DESIGNATION OF RESPONSIBILITY**  
**41 C.F.R. § 60-2.17(a)**

As part of its efforts to ensure equal employment opportunity to all individuals, WSU has designated specific responsibilities to various staff to ensure the AAP focuses on all components of the employment system. To that end, the WSU President, the Chief Human Resource Officer, the Director for CCR, and those employed as supervisors and managers have undertaken the responsibilities described below.

**WSU President**

The primary responsibility and accountability for implementing the AAP rests with the WSU President. This person is responsible, through the Chief HR Officer, the AVP & Chief Compliance Officer, the Director of CCR, and managers/supervisors, for adherence to WSU's policy of equal employment opportunity and affirmative action. This role includes, but is not limited to, the following duties:

1. Designate appropriate personnel with the responsibility for overseeing, administering, implementing, and monitoring WSU's AAP.
2. Ensure that those designated personnel responsible for all AAP components are given the necessary authority and top management support and staffing to successfully implement their assigned responsibilities.
3. Impart the personal direction that ensures total involvement and commitment to equal employment opportunity programs through WSU's AAP.

**Chief Human Resource Officer (CHRO)**

The CHRO is responsible for overall supervision of the implementation of personnel processes and other human resources functions. The CHRO's responsibilities include, but are not limited to, the following:

1. Ensure that WSU Human Resource Services (HRS) staff adhere to the stated policy of equal employment opportunity and monitor the application of equal employment opportunity policies in personnel processes and other human resources functions.
2. Participate in periodic discussions with managers, supervisors, and all others involved in personnel processes to ensure AAP and equal employment opportunity policies are being followed.
3. Ensure that transfer and promotion processes include a review of qualifications to ensure equitable opportunity, based on job-related employment practices.
4. In partnership with CCR, and relevant departments as appropriate, conduct periodic reviews of: 1) training programs and hiring and promotion patterns, 2) facilities, and 3) sponsored educational, training, recreational, and social activities to ensure these programs and activities are conducted consistent with WSU's equal opportunity policies.
5. Ensure that all new employees receive information about WSU's Equal Employment Opportunity Policy (Executive Policy #12) and the Policy Prohibiting and Harassment (Executive Policy #15),

as well as ensuring that all employees take the Discrimination, Sexual Harassment, and Sexual Misconduct Prevention Training as required according to WSU Policy and by directive of the WSU President.

6. Periodically analyze applicant flow to determine the mix of persons applying for employment by race/ethnic origin and gender.
7. Periodically analyze whether advertising is placed in minority and female-oriented publications, as applicable.
8. Review, and assist managers and supervisors in reviewing, staff job descriptions and specifications, as well as faculty notices of vacancy, to ensure they are free of discriminatory provisions and artificial barriers, that all requirements are job-related, that they are realistic, and that they reflect the actual work requirements of the essential job duties.
9. Ensure that notice is periodically sent to all departmental human resource contacts of posters and policies required to be displayed. Human Resource Services also maintains a [webpage](#) that indicates the location of designated campus areas for required display of posters.
10. Conduct periodic salary reviews to aid equity and retention (*see* BPPM 60.12) and provide support to the Office of the Provost to monitor and approve faculty salaries.

### **WSU Compliance and Civil Rights (CCR)**

CCR is responsible for monitoring the University's EEO/AA program and policies. CCR's responsibilities include, but are not limited to, the following:

1. Provide information and technical assistance to WSU's employees, as necessary, regarding WSU's equal employment opportunity and affirmative action commitments.
2. Ensure that WSU's AAP is reviewed and updated at least on an annual basis in accordance with stated policy.
3. Design and monitor the implementation of the AAP.
4. Periodically review and identify opportunities to provide technical assistance to departments for improvement through assessment of the effectiveness of the equal employment opportunity programs.

5. Advise management in the modification and development of WSU's policies to ensure the enhancement of equal employment opportunity for all employees and potential employees within existing equal employment opportunity guidelines.
6. Provide compliance guidance to departments related to required posters and advertising/communicating WSU's equal employment opportunity policies and AAP.
7. Assist in review and revision of all relevant policies, procedures, and rules to ensure they are not in violation of federal or state equal opportunity laws and regulations.

### **Managers and Supervisors**

In their direct day-to-day contact with WSU's employees, managers and supervisors have assumed certain responsibilities to help WSU ensure compliance with equal employment opportunity programs and effective implementation of the AAP. These include, but are not limited to, the following:

1. Adhere to WSU's equal employment opportunity and affirmative action policy.
  - A. Support and assist the CHRO and the Director of CCR in developing, maintaining, and successfully implementing the AAP.
  - B. Take action to prevent discrimination and harassment of employees.
2. Encourage employees to seek opportunities that might lead to greater personal growth and value, and counsel them with respect to what is needed for upward mobility within the employment structure.
3. Ensure that all interviews, offers of employment and/or wage commitments are consistent with WSU's policy.
4. Implement the internal promotion and transfer of all employees under their supervision consistent with AAP goals and objectives, and WSU employment policies.
5. Assist in identifying problem areas and provide needed information for establishing and meeting department affirmative action goals and objectives.
6. Encourage search committee members to utilize the recruitment training and toolkit provided by HRS.

## CHAPTER 8: IDENTIFICATION OF PROBLEM AREAS

### 41 C.F.R. § 60-2.17(b)

#### *Terminology*

*The phrases “comparison of incumbency to availability,” and “problem area” appearing in this chapter are terms WSU is required by government regulations to use. The criteria used in relation to these terms are those specified by the government. These terms have no independent legal or factual significance. Although WSU will use the terms in good faith in connection with its AAP, such use does not necessarily signify the university agrees that these terms are properly applied to any particular factual situation and is not an admission of non-compliance with EEO laws, regulations, and objectives. Whenever the term “goal” is used, it is expressly intended that it “should not be used to discriminate against any applicant or employee because of race, color, religion, gender, or national origin,” as stated in Title 41 Code of Federal Regulations, Part 60-2.16(e).*

In addition to comparing incumbency to availability within job groups, WSU has conducted studies to identify problem areas in each of its selection procedures (i.e., hires, promotions, and terminations). WSU will continue to monitor and update these studies during each AAP year. In each case where potential problem areas have been identified, affirmative actions, as appropriate, will be taken consistent with any of the action-oriented programs described in Chapter 9 of this AAP.

Goals are established within each of the job groups at no less than the current availability data for the job group.

#### **41 C.F.R. § 60-2.17(b)(1): Workforce by Organizational Unit and Job Group**

An analysis of minority and female distribution within each organizational unit was accomplished by a thorough investigation of the Workforce Analysis.

An analysis of minority and female utilization within each job group was accomplished by a thorough investigation of the Comparison of Incumbency to Availability reports.

#### **41 C.F.R. § 60-2.17(b)(2): Personnel Activity**

Applicant flow, hires, promotions, and terminations were analyzed by job group. An analysis of selection disparities in personnel activity between men/women and whites/minorities was accomplished by a thorough examination of transaction data.

See *Summary of Personnel Transactions Report* for each job group.

#### **41 C.F.R. § 60-2.17(b)(3): Compensation Systems**

Compensation analyses were conducted by comparing the salaries for men v. women, and whites v. minorities in each *job title/job group/paygrade*.

## **CHAPTER 9: ACTION-ORIENTED PROGRAMS**

### **41 C.F.R. § 60-2.17(c)**

WSU tailors our action-oriented programs each year to ensure they are specific to the problem identified.

#### Action-Oriented Program (AOPs):

The action-oriented programs designed to address the underutilization of women and minorities, the utilization goal set for individuals with disabilities, and the hiring benchmark for the protected veterans are listed below. These action-oriented programs will be carried-out throughout the AAP year.

Evaluation of these AOPs will be conducted at least annually. The CHRO, with the help of managers and supervisors, will be responsible in ensuring that the following are implemented.

#### **Recruitment:**

1. WSU will continue to place advertisements on job opportunities through local job service offices. Positions advertised through the [WSU Jobs](#) portal are automatically routed to the local job service office.
2. Due to the extensive technical education and experience required for some positions, WSU will also continue to place job opportunity announcements in the [WSU Jobs](#) website, and in diverse regional, national, and topical job advertising sources when appropriate.
3. WSU will continue to encourage academic departments to utilize discipline specific advertising sources and other position specific targeted recruitment strategies. WSU provides [Equity Resources](#) to broaden candidate pools.
4. WSU will educate managers and supervisors about their utilization goals and encourage commitment to equal opportunity policies and goals.
5. Advertisements will always carry the Equal Employment Opportunity clause.
6. Minority and female applicants will be considered for all positions for which they are qualified.
7. WSU will continue to advertise job postings that include the full salary ranges available for positions and identify any available remote and hybrid remote/onsite options.

#### **Job Specifications/Selection Process:**

1. Develop position descriptions that accurately reflect position functions, and are consistent for the same position within the organizational unit. WSU will continue to encourage departments to assess their position descriptions for consistency from one location to another.
2. WSU will continue to encourage departments to develop or revise job or worker

specifications to ensure that they contain academic, experience, and skill requirements that do not constitute inadvertent discrimination. Develop specifications that are free from bias with regard to legally protected classes.

3. Approved position specifications and worker specifications will be made available to all members of management involved in the recruiting, screening, selection, and promotion process. Copies of notices of vacancy may also be made available to recruiting sources.
4. WSU will continue to use only worker specifications that include job-related criteria.
5. WSU will continue to encourage departments to carefully select and counsel all personnel involved in the recruiting, screening, selection, promotion, disciplinary, and related processes to eliminate bias in all personnel actions. WSU provides implicit bias trainings to search committees.

#### **Job Advancement:**

1. WSU will continue to post or announce job opportunities. WSU's Job Posting Policy System requires postings of all Civil Service, Administrative Professional and Tenure-Track Faculty positions up to the Senior Management level (see *BPPM 60-17* for limited exceptions).
2. All employees, including women and underrepresented minorities, are encouraged to use university facilities and participate in officially sponsored social and recreational activities.
3. All employees, including women and underrepresented minorities, can choose training courses through the Training Catalog and include them in their career development plan. WSU offers a [Community and Equity Certificate Program](#), a professional development opportunity available to all WSU faculty and staff. The Community & Equity Certificate lays the groundwork for a challenging, personal journey for individuals who are committed to creating equitable and inclusive environments. Through the certificate program, faculty and staff expand their understanding of equity-mindedness and build a toolkit for engaging more effectively with students, colleagues, and community partners. Faculty and staff must complete seven workshops across four areas to earn the certificate.
4. Qualified employees can request release time for trainings for professional development or to improve their job skills.
5. Tuition waivers are offered to all eligible employees on a space available basis. See *BPPM 60.70 for eligibility requirements and limitations*.

Many WSU campuses, colleges, and departments have developed additional programs, events, and initiatives to promote diversity, equity, and inclusion (DEI) in their recruitment and retention efforts, including:

#### **WSU Vancouver**

- The Building a Community of Equity (BaCE) Program expanded to provide virtual workshops on equity, diversity, inclusion, justice and belonging. The workshop, "Embedding Equity in the Search for Staff and Faculty," provides tools to search committees to transform the search process and ensure equity, diversity, inclusion and belonging in outreach, recruitment, hiring and retention of staff and faculty. In 2019 - 2020, faculty from Black, Brown, Indigenous, and People of Color communities represented 50% of all new faculty hired at WSU Vancouver.
- As part of the BaCE workshop on Embedding Equity in the Search, all search team members receive resources to actualize equity and inclusion in their respective search process, including: Outreach and recruitment links to advertise across Black, Brown, Indigenous, People of Color, LGBTQ+, and women communities; preemployment inquiry guidelines; Sample equity-minded interview questions; Recommended readings and research on bias in the search process; Tools to recognize and interrupt microaggressions; Language for creating more equity-minded notices of vacancy; and Search criteria matrix to ensure equity in specific evaluative criteria).
- The WSU Vancouver Strategic Plan 2021 - 2026 has expanded with the inclusion of equity objectives and strategies within all 5 goals (Goal 1 - Research; Goal 2 - Student Success; Goal 3 - Infrastructure for Resilience and Growth; Goal 4 - Equity and Inclusion; Goal 5 - Community).
- The Support and Empowerment for Employees of Color (SEEC) Association held the 5<sup>th</sup> Annual Four Cs Reception during spring semester 2022. SEEC nurtures a deeper sense of belonging, community, empowerment, and visibility for faculty and staff of color at WSU Vancouver.
- WSU Vancouver is endeavoring to hire new full-time campus director of Native American Programs at WSU Vancouver. In partnership with the WSU Vancouver Native American Community Advisory Board (NACAB), WSU Vancouver seeks to acknowledge tribal homelands and presence through Indigenous art and ongoing cultural engagement, as articulated in the 2021-2026 WSU Vancouver strategic plan.

#### **College of Agricultural, Human, and Natural Resource Sciences (CAHNRS)**

- CAHNRS drafted more inclusive notices of vacancy by avoiding gendered words and terms
- CAHNRS advertised with organizations like the National Association for Chicana and Chicano Studies to reach a more diverse pool of candidates
- CAHNRS required candidates to provide diversity statements
- CAHNRS directed search committee members to receive training on unconscious bias awareness
- CAHNRS hosted a semester-long series of DEI Professional Training Workshops, including events in celebration of Asian American and Pacific Islander Heritage Month and LGBTQIA Pride Month



## **Academic Outreach and Innovation (AOI), WSU Global Campus**

- AOI's Prospective Employees webpage includes an Equity and Diversity statement and link to the Compliance and Civil Rights website.
- The chancellor approved an additional job posting site specifically designed to develop diverse applicant pools.
- AOI maintains a search committee database to track its recruitment efforts and its search committee members' recruitment/hiring training, including implicit bias awareness training.

## **Graduate School**

- The Graduate School's Research Assistantships for Diverse Scholars (RADS) program intends to increase access and opportunities to graduate education for U.S. students from under-represented and under-served communities, and to increase graduate student diversity at WSU and in our degree programs.
- The Graduate School announced the Ann Chittenden Holland Award for STEM graduate students who have shown excellence in diversity, equity, and inclusion through their scholarship and/or service. This is a \$1,000 award (1 each year).
- The Graduate School announced the Charles Allen Award for graduate students who have shown excellence in diversity, equity, and inclusion through their scholarship and/or service. This is a \$1,000 award (1 each year).
- The Graduate School announced the Graduate School Dissertation Year Fellowship. This is a nine-month fellowship for doctoral candidates that includes a stipend of up to \$20,000 for the academic year. Also included is a two-credit tuition waiver and up to \$1,000 for travel and/or research. Eligible applicants exhibited a record of service that promotes equitable access to underrepresented groups, women, or racial minorities; expressed a commitment to research that is sensitive to inclusion of historically underserved populations and an understanding of issues of inequality; demonstrated potential to bring perspectives that come from an understanding of experiences of underserved populations to their academic research; had teaching/TA experience that demonstrates an understanding of barriers facing minorities, women, people with disabilities, and/or other groups traditionally underrepresented in higher education; and/or exhibited a record of leadership or mentorship experience that advances or embraces inclusiveness.

## **Office of Research**

- The Office of Research hosted a training by Trymaine Gaither, Special Assistant to the Provost for Inclusive Excellence, titled "Mindfulness and Anti-Racism Training Pt. 1." The training explored mindfulness-based strategies to foster engaged discussion related to complex topics such as intergroup anxiety and micro-aggressions while being mindful of the impact those topics/discussions might have on oneself and others. The session focused on developing strategies to identify and address micro-aggressions and helpful ways to approach uncomfortable topics in a workplace setting. Participants also participated in mindfulness-based practices that promote greater connection, self-awareness, stress reduction, and compassion.
- The Office of Research hosted a training by Trymaine Gaither titled "Mindfulness and Anti-Racism Training Pt. 2." The training mindfully examined the impact of unconscious bias, anti-

blackness, and racism-related stress in the workplace and the world. The training challenged participants to lean into how systemic racism is prevalent today and prepared them to interrogate their personal contributions to systems of oppression.

- The Office of Research hosted a talk by writer Rosalyn LaPier, titled “Land as Sacred Text: How Climate Change Will Impact Indigenous Spirituality.” The talk explored how, for most Indigenous peoples, changes in the natural world impact their ability to practice their religious beliefs.
- The Office of Research hosted a talk by Dr. Willie May, Vice President for Research and Economic Development at Morgan State University (MSU), titled “Research at HBCUs and the Morgan State University Enterprise.” The talk provided an overview of the research enterprise at Historically Black Colleges and Universities (HBCU) and MSU. Topics included the history of HBCUs and MSU, funding for research at HBCUs and MSU, and the current academic programs and research focus areas at MSU.
- In partnership with WSU’s Office of External Affairs and Government Relations, the Office of Research established a relationship with MSU, one of the nation’s leading HBCUs. Dr. May visited WSU in June 2021 to discuss potential research collaborations; operations of common-use research facilities and instrumentation; financial management; health sciences collaborations; and stakeholder engagement. As an outcome of the visit, WSU provided detailed information on research instrumentation facility operational and administrative practices to MSU. Christopher Keane, Vice President for Research, followed up with a reciprocal visit to MSU in December 2021 to discuss the above topics, particularly instrumentation issues and research opportunities, in further detail. MSU and WSU also discussed and exchanged ideas regarding their respective programs in innovation, commercialization, and technology transfer.
- The Office of Research also released several newsletters and reports related to the impacts of the COVID-19 pandemic, bias, and inequality on research and innovation.

#### **Edward R. Murrow College of Communication**

- The college created a DEI committee comprised of faculty and staff to plan, assess, and implement DEI initiatives in accordance with the college’s strategic plan.
- The college’s Northwest Public Radio participated in virtual job fairs through Public Media Jobs. This nationally marketed recruitment effort provided job seekers from a wide range of cultural backgrounds to participate in live interviews with members of the Northwest Public Broadcasting staff and the college’s human resource representatives.
- The college established a process to include faculty and staff job postings with professional organizations for underrepresented groups (e.g. the American Association of Black Journalists, the Asian American Journalists Association, Hispanic Marketing Council, Black Marketers Association of America, National Black Public Relations Society, and the National Association of Hispanic Journalists) for all of its faculty and staff searches.

#### **College of Education (COE)**

- COE created the role of Associate Dean of Equity and Inclusion for Faculty and Staff Development, which is a quarter-time position with the primary responsibility of promoting equity, diversity, and inclusion across the College of Education, with a focus on supporting the work, development, and experiences of faculty and staff across the WSU campuses. Dr.

Katherine Rodela holds the position, and one strand of her work is to support the retention and mentorship of underrepresented faculty and staff (People of Color, LGBTQ+ persons, and persons with disabilities among others) by creating affinity spaces of support (e.g. writing groups with faculty of color, regular meetings with the faculty and staff of color) working closely with the College Leadership Team meeting to address the needs and create supports for underrepresented faculty and staff.

- To support the retention and success of faculty of color, especially early career faculty of color, Dr. Rodela began a New Faculty of Color Writing Group to support tenure-line assistant professors of color. They met for 3 hours each week in Spring Semester 2021, and then after her appointment as Associate Dean, she relaunched the writing group in Fall 2021 Semester as the “Early Career Scholars of Color Writing Group,” and included two new early career scholars, postdoc Amber Brown Ruiz and new scholarly career-track assistant professor Emma Ariyo. They met most weeks for 3 hours a week for community-building, mentoring, and writing.
- COE created an Associate Deans' LGBTQIA+ Advisory Council, which is comprised of LGBTQ+ identifying faculty to advise the two Associate Deans of Equity and Inclusion (Dr. Rodela and Dr. Amir Gilmore) in creating more visibility and support for LGBTQ+ inclusion and topics in the COE. In 2022-2023, they plan to expand the group to include staff and graduate students in the COE.
- The COE Equity and Inclusion committee engaged in two All-College surveys on equity and inclusion. Survey #1 sought feedback from staff and faculty about specific equity topics they wished to learn more about and surface any general concerns/issues they had related to equity, inclusion, diversity, and justice. This survey received 99 responses. Survey #2 sought to document equity-related work staff and faculty engaged in related to research, teaching, service, and outreach. 56 people completed this survey. Results of both surveys will be used by the COE E&I Committee to engage in future planning on professional learning and initiatives to support equity work in the COE in the future.

### **Elson S. Floyd College of Medicine**

- The Strategic Diversity Action Plan outlines the college’s rationale for Diversity, Equity, and Inclusion along with baseline, strategies, and metrics connected to efforts. It was implemented and measured over a three-year period beginning in the winter of 2020-2021. At the end of each year, the College develops and disseminates an Annual Progress Report. The plan undergoes the college’s Continuous Quality Improvement process to ensure it meets the needs of the college’s vision and mission.
- The college’s Inclusive Excellence Bias Training for Search Committees policy outlines training for search committees with a DEI focus.
- The college’s Search Toolkit is a comprehensive guide intended to streamline steps for the search process and includes an equity-focused checklist.
- The college’s Diversity, Equity, Inclusion, Access, and Justice Policy is designed to achieve the college’s mission by promoting diversity, equity, access, and inclusion among students, faculty, staff, and administration, enriching education and clinical training, research and scholarship, clinical care, and service and outreach activities, and ultimately improves access to quality health care for all communities in Washington State and beyond.

## **International Programs**

- International Programs is undertaking the two-year Internationalization Lab through the American Council on Education (ACE). ACE describes its DEI lens as addressing “the role of institutions, individuals, and internationalization in racial, economic, and social justice. It means going beyond numerical diversity to ensure that students and employees of all backgrounds feel that their campus is equitable, welcoming, inclusive, and supportive. Inclusive and equitable campus climates have a meaningful, positive effect on student persistence and success and faculty and staff engagement.”
- Multiple members of the International Programs team serve on the Commission for Gender Identity/Expression and Sexual Orientation, advising the president and other WSU administrators on matters relating to needs and concerns of the campus communities related to gender identity, gender expression, and sexual orientation.
- A team member attended the annual Diversity Abroad conference, which encourages support of study abroad across many planes of diversity and inclusion.
- Two team members completed the Community and Equity Certificate Program, and additional team members will be following suit. Staff members serve as facilitators of the “International Cultures & Teams” workshop for the WSU Community & Equity Certificate.
- Several team members are Mental Health First Aid certified.
- The International Student and Scholar Services professional development committee has added a DEI focus.
- The International Peer Mentor Program offers supports during students’ first terms, and the Learning Support Center helps with academic support for international students and scholar retention.
- J-1 visa briefings for scholars also serve as connecting points for other international scholars, including those from countries with low representation, to ensure they build community.
- The International Center runs activities, programs, and events that bring international and domestic communities together and foster cultural and linguistic diversity through foreign language tables, the Engage the World program, coffee hours, and dependent programming (e.g. monthly cooking demonstrations that support retention through increasing community and mitigating isolation, especially for partners and spouses not proficient in English).

## **College of Arts and Sciences (CAS)**

- All faculty search committees (i.e. hiring for new positions) attended trainings that included best practices for recognizing and minimizing implicit bias as well outreach and recruitment efforts to build diverse applicant pools. Representatives from the search committees also attended focused trainings on inclusive hiring practices. Next year, these trainings will again be available and expected for all search committee members.
- Implicit bias discussions were embedded into the onboarding training for the CAS Tenure and Promotion Advisory Committee. Several CAS departments took Provost Office training on implicit bias, microaggressions, and/or inclusive mentoring practices, in part spurred by the equity steps initiative highlighted above. CAS also began developing a “Postdoc-to-Tenure Track pipeline” hiring model where talented early career candidates are hired with the potential for transition to tenure-track while also giving them time and resources to building their scholarly and teaching record.
- CAS named Michael Holloman as its new Coordinator for Native Arts Outreach and Education,

and he has already engaged in discussions with community colleges and tribal organizations about possibly growing WSU enrollments in these areas. CAS has actively worked with Native American Programs to recruit/retain faculty who can contribute to the Tribal Nation Building Leadership Program curriculum.

### **University Marketing and Communications (UMC)**

- Understanding the importance of people seeing themselves represented and feel valued by our internal and external communications, UMC is committed to sharing stories, photos, and videos that accurately represent the full spectrum of the lived experiences of the WSU community.
- UMC maintains a calendar of culturally significant days, weeks, and months and uses that calendar to make editorial decisions for content on the website, social media platforms, and its daily news and information site.

### **College of Veterinary Medicine (CVM)**

- CVM implemented a Faculty Recruitment Checklist to ensure consistency of process and procedure in college faculty recruitments. This process requires search committee members to complete WSU Faculty Recruitment Basics training and review information and resources regarding applicant/recruitment biases.
- CVM requires a diversity statement from applicants for all tenure-track, tenure, and career faculty recruitments.
- CVM created a DEI Taskforce to identify college DEI strengths, challenges, and opportunities. In January 2022 the taskforce transitioned to a permanent college committee.
- CVM created a Director for Diversity, Equity, and Inclusion position to lead strategic DEI efforts for the college in areas of students and employee recruitment, retention, and inclusion. Recruitment initiated in November 2021.
- CVM created a Recruitment Manager position to ensure compliance with WSU policies, procedures, and best practices regarding recruitment, retention and hiring processes. Recruitment initiated in March 2022.

### **College Assistance Migrant Program (CAMP)**

- CAMP is a federally-funded program designed to meet the needs of students with migrant or seasonal farm-working backgrounds. Recruitment for professional staff positions reflects the target student populations and have preferred requirements for Spanish language and cultural skills.
- CAMP's speakers and other contracted individuals must demonstrate a strong connection to the migrant and seasonal farm working community and Washington state target recruiting areas for higher education, have Latinx cultural competency or identify as Latinx, or have previously worked with High School Equivalency Program or CAMP participants.
- CAMP also celebrates intersectionality by selecting speakers who identify with marginalized populations, like veterans and members of the LGBTQIA community.
- CAMP hosts DEI-focused programs or partners with organizations like WSU's Chicana Latinx Student Center, WSU's Chicana/o Latina/o Student Alliance, Movimiento Estudiantil Chicana de Aztlán (M.E.Ch.A), and Latinx-focused Greek life organizations.

## **Upward Bound**

- WSU Upward Bound serves 112 low-income, and/or first-generation students in Okanogan County, with the goal of making postsecondary education a possibility for everyone, especially those who come from marginalized populations.
- It is important to the success of the Upward Bound program that its staff reflects the students they serve, providing these students with role models/mentors that have similar life experiences. Upward Bound ensures that its outreach includes organizations that yield a diverse applicant pool, including women and those from underrepresented groups.

## **Office of the Provost**

- The Office of the Provost provides several trainings designed to address issues of equity and emphasize best practices to attract, hire, and retain faculty and staff from underrepresented groups, such as its five-part mindfulness-based anti-racism series, unconscious bias awareness training, hiring and performance review best practices trainings, and network-based mentorship trainings.
- The Office created a provost's advisory committee on inclusive excellence.
- The Office developed a cluster hire initiative in which the third round relates to equity and racial justice. To date, this initiative has led to the hiring of nine tenure-track faculty and acceptance of five more proposals. This initiative includes funding from the Office for new positions; trainings on best practices in creating notices of vacancy; searching, hiring, mentoring, and retaining faculty; regular mentoring meetings with each new cohort of the cluster hire, which also include other faculty hired in the same year who are from underrepresented groups; and discussion with the Senior Vice Provost on documenting impact for annual review and progress toward promotion and tenure.
- The Office developed small-grant initiatives to help departments institutionalize network-based mentoring approaches and create more inclusive teaching practices/curricula.
- The Office incorporated a DEI focus into the Provost's Leadership Academy, which trains many of the university's future leaders. About a quarter of the final leadership projects had an explicit DEI focus.
- The Office has an intentional focus on ensuring that committees it forms (e.g. awards committees, promotion and tenure committee) are diverse and inclusive.
- The Office created a program for the National Day of Racial Healing and a Chairing Police Advisory Board.
- The Office revised its faculty manual and promotion and tenure guidelines to increase equity in faculty evaluation.
- The Senior Vice Provost represents the Office on the cross-campus committee of campus leaders of DEI initiatives and participates in the Task Force on Equity Policy and Practice.
- The Associate Vice Provost for Equity and Inclusive Excellence represents DEI leaders on the Pullman campus Chancellor's Cabinet and the WSU President's Cabinet.
- The Office participates in the Louis Stokes Alliances for Minority Participation, which focuses on increasing diversity in STEM education by increasing degree completion for undergraduate and graduate students of color.

## **CHAPTER 10: INTERNAL AUDIT AND REPORTING**

### **41 C.F.R. § 60-2.17(d)**

Inherent in the AAP is the need for periodic self-assessment of problems encountered, corrective action taken, and progress made. Self-evaluation requires complex record keeping systems on applicants, employees, and components of the AAP itself. Periodic reports from supervisors, department managers, the AVP & Chief HR Officer, the Director of CCR, and other relevant persons are required.

The objective of all record keeping systems to be implemented is to assess the results of past actions, trends, the appropriateness of goals and objectives, the appropriateness and relevancy of identified solutions to problems, and the adequacy of the Plan as a whole. In addition, a further objective is to identify the proper corrective actions to be made to all components.

In order to fully achieve the objectives of such a record keeping system, the results of it must lead to follow-up through feedback to managers, supervisors, and staff, through reallocation of resources, through modifications to plans and the record keeping system itself, through appropriate recognition of personal achievements as well as punitive actions for discriminatory acts. For any identified deficiencies, appropriate corrective action will be identified and implemented.

The records that are maintained are the basis for updating the affirmative action plan, including revising the availability data and establishing annual numerical goals. The internal audit and reporting system is used as the basis for evaluating systemic, results-oriented programs and affirmative action efforts.

The WSU auditing and reporting system periodically measures the effectiveness of its total affirmative action program. WSU ensures that the following are completed periodically as appropriate, advising and consulting with various WSU administrators and departments as needed:

1. Periodically review personnel processes, including records related to placements, transfers, promotions, terminations, and compensation;
2. Upon receipt of discrimination concerns related to placements, transfers, promotions, terminations, and compensation, review personnel activity and engage in investigation or resolution as appropriate
3. Provide training and guidance to supervisors and managers where data indicates that equal employment opportunity goals and organizational objectives are not sufficiently being met;
4. Develop internal reports describing discrimination grievances and responses, to better understand climate and ensure all factors impacting diversity recruitment and retention can be appropriately addressed;
5. Review report results with all levels of management as appropriate; and
6. Advise top management of program effectiveness and submit recommendations to improve unsatisfactory performance.

# **Washington State University**

**All WSU Locations**

## **PART II: AFFIRMATIVE ACTION PLAN FOR PROTECTED VETERANS AND INDIVIDUALS WITH DISABILITIES**

**FOR**

**January 1, 2022 - December 31, 2022**



**PART II**  
**AAP FOR PROTECTED VETERANS AND INDIVIDUALS WITH DISABILITIES**  
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**POLICY STATEMENT**  
**41 C.F.R. §§ 60-300.44(a); 60-741.44(a)**

WSU provides equal employment opportunity in the employment and advancement for all persons regardless of status as a protected veteran and/or individual with a disability at all levels of employment, including the executive level.

WSU does not and will not discriminate against any applicant or employee regardless of status as a protected veteran and/or individual with a disability to any position for which the applicant or employee is qualified.

In addition, WSU is committed to a policy of taking affirmative action to employ and advance in employment qualified protected veteran employees and qualified employees with disabilities at all levels, including the executive level. Such affirmative action shall 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 shall be made on the basis of an individual's capacity to perform a particular job and the feasibility of any necessary job accommodation. WSU will make every effort to provide reasonable accommodations to any physical and mental limitations of individuals with disabilities and to disabled veterans.

Employees and applicants shall 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:

- (1) Filing a complaint;
- (2) 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 or 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;;
- (3) 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 or section 503 or its implementing regulations or any other federal, state or local law requiring equal opportunity for disabled persons; or
- (4) Exercising any other right protected by VEVRAA or Section 503 or their implementing regulations.

Our obligations in this area stems 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, sex/gender, sexual orientation, gender identity/expression, religion, age, color, creed, national or ethnic origin, physical, mental or sensory disability, including disability requiring the use of a trained service animal, marital status, genetic information, status as an honorably discharged veteran or member of the military, and/or immigration or citizenship status, except as authorized by federal or state law, regulation, or government contract. WSU's EEO policy and affirmative action obligations include the full support from the WSU Board of Regents.

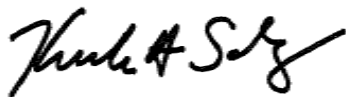
WSU will also continually design and implement audit and reporting systems that will measure the effectiveness and the compliance of the AAP, identify the need for remedial actions, maintain up-to-date and research driven retention and recruitment strategies, determine if objectives were attained, and determine if opportunities to participate in university-sponsored activities were extended to all employees and applicants.

WSU is also committed to abiding with the Pay Transparency Nondiscrimination Provisions and therefore, will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. WSU 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, including an investigation conducted by the employer, or (c) consistent with WSU's legal duty to furnish the information.

If you have any questions regarding our equal employment opportunity, harassment policies or the complaint procedure, you may contact WSU Compliance and Civil Rights Compliance, or your local Human Resources representative. Parts of the Affirmative Action Plan may be reviewed, as appropriate, by making an appointment with WSU Compliance and Civil Rights.

See also:

- WSU Executive Policy #12 – Equal Employment Opportunity and Affirmative Action Policy.
- WSU Executive Policy #15 – Policy Prohibiting Discrimination and Harassment.



Dr. Kirk Schulz  
WSU President

June 17, 2022

**CHAPTER B: REVIEW OF PERSONNEL PROCESSES**  
**41 C.F.R. §§ 60-300.44(b); 60-741.44(b)**

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 WSU's examination and selection methods to identify barriers to employment, training, and promotion.

- 1) WSU 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. In order to determine whether an individual is qualified for a particular job, a close examination of the content of the job is made, as well as a review of the job qualifications of known protected veterans and individuals with disabilities, both applicants and employees. In determining the qualifications of a protected veteran, consideration is given only to that portion of the military record, including discharge papers, relevant to the job qualifications for which the veteran is being considered.
- 2) WSU 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.
- 3) WSU ensures that applicants and employees with disabilities have equal access to its personnel processes, including those implemented through information and communication technologies.
- 4) WSU provides reasonable accommodations, unless such accommodations will cause undue hardship to WSU, to applicants and employees with disabilities to ensure that equal employment opportunity are extended in the operation of its personnel processes.
- 5) WSU has adopted an Electronic and Information Technology (EIT) Accessibility Policy that ensures that the accessibility of legacy EIT is assessed and that future development or procurement of EIT meets accessibility standards.
- 6) WSU designates an ADA Coordinator to provide technical guidance and support for employment processes, as needed.

## **CHAPTER C: PHYSICAL AND MENTAL QUALIFICATIONS**

### **41 C.F.R. §§ 60-300.44(c); 60-741.44(c)**

To ensure that all physical and mental qualifications and requirements are job-related and promote equal employment opportunity for all known protected veterans and employees and applicants with qualified disabilities, reviews are periodically made of WSU's physical and mental qualifications and requirements as they relate to employment, training, and promotion.

WSU's 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.

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

## **CHAPTER D: REASONABLE ACCOMMODATION TO PHYSICAL AND MENTAL LIMITATIONS**

### **41 C.F.R §§ 60-300.44(d); 60-741.44(d)**

WSU will make every effort to provide reasonable accommodations to 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 implemented in WSU's electronic and/or online application systems. WSU 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. WSU will confidentially review performance issues of 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:

WSU Human Resource Services  
Disability Services  
[hrs.disabilityservices@wsu.edu](mailto:hrs.disabilityservices@wsu.edu)  
509-335-4521

**CHAPTER E: HARASSMENT**  
**41 C.F.R §§ 60-300.44(e); 60-741.44(e)**

WSU 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 WSU Policy Prohibiting Discrimination and Harassment, which includes a section prohibiting harassment of individuals with disabilities and/or protected veterans are available for distribution to new as well as to existing employees.

WSU ensures that all employees receive Discrimination and Harassment Prevention training within six (6) months of being hired and at least once annually. Supervisors, Chairs, and Directors also receive additional training.

**CHAPTER F: EXTERNAL DISSEMINATION OF POLICY, OUTREACH AND POSITIVE RECRUITMENT**  
**41 C.F.R. §§ 60-300.44(f); 60-741.44(f)**

Based upon WSU's review of its personnel policies as described in Chapter B, the following activities will be implemented or continued to further enhance our affirmative action efforts. All activities are the responsibility of the Director of CCR.

- 1) Initiate and maintain communication with organizations having special interests in the recruitment of and job accommodations for protected veterans and individuals with disabilities.
- 2) Ensure images are inclusive of workers with disabilities in consumer, promotional, or help wanted advertising.
- 3) Disseminate information concerning employment opportunities to radio and television stations, and to publications that primarily reach protected veterans and individuals with disabilities.
- 4) Provide information emphasizing job opportunities for protected veterans and individuals with disabilities to all local educational institutions, public and private.
- 5) Inform all recruiting sources, in writing and orally, of the Company's affirmative action policy for protected veterans and individuals with disabilities.
- 6) List with the State Employment Development Department all suitable job openings.

The exemptions for posting jobs are when positions are,

- (1) executive and top management positions,
- (2) positions that will be filled from within the contractor's organization,
- (3) and positions lasting three days or less.

This is an on-going activity. A listing of job opportunities reported to the local State Employment Service Delivery System is always kept current.

- 7) Notify all subcontractors, vendors, and suppliers that WSU is an Affirmative Action and Equal Employment Opportunity employer. This includes their obligation to annually file their EEO Reporting form and VETS 4212 form and, for employers with 50 or more employees and contracts of \$50,000 or more, their obligation to develop a written affirmative action plan.
- 8) Conduct formal briefing sessions with representatives from recruiting sources. Include as part of the briefing sessions, facility tours, clear and concise explanations of current and future job openings, position descriptions, worker specifications, explanations of the University's selection process, and recruiting literature. Arrange for referral of applicants, follow up with sources, and feedback on disposition of applicants.
- 9) Participate in veterans "job fairs" and work study programs with Veterans' Administration rehabilitation facilities and schools which specialize in training or educating protected veterans.
- 10) WSU will also grant leaves of absence to employees who participate in honor guards for the funeral of veterans.



## **CHAPTER G: INTERNAL DISSEMINATION OF POLICY**

### **41 C.F.R. §§ 60-300.44(g); 60-741.44(g)**

In order to gain positive support and understanding for the affirmative action program for protected veterans and individuals with disabilities WSU will implement or continue to implement the following internal dissemination procedures. The following communication priorities are designed to foster support and understanding from WSU's executive staff, management, supervisors, and other employees, in an effort to encourage all employees to take the necessary actions to aid WSU in meeting its obligations.

- 1) Provide support, as needed, to working groups identifying best practices for employee retention.
- 2) Provide technical guidance to university departments regarding the recruitment of protected veterans and individuals with disabilities.
- 3) Include the policy in WSU's policy manual and other in-house publications.
- 4) Conduct special meetings with executive, management, and supervisory personnel to explain the intent of the policy and individual responsibility for effective implementation, making clear the President's support and emphasis for the policy.
- 5) Provide training sessions for all employees involved in recruiting, selection, promotion, and other related employment issues for protected veterans and individuals with disabilities, including training about implicit bias.
- 6) Provide departments with utilization goals and training on interpretation and best practices to ensure equal employment opportunities.
- 7) Inform union officials of the contractor's policy and request their cooperation.
- 8) Include non-discrimination clauses in all union agreements and review all contractual provisions to ensure they are non-discriminatory.
- 9) Post the policy on WSU bulletin boards, along with information about WSU's Policy Prohibiting Discrimination and Harassment which includes protection from harassment on the basis of disability and protected veteran status.
- 10) When employees are featured in employee handbooks or similar publications for employees, include employees with disabilities.

**CHAPTER H: AUDIT AND REPORTING SYSTEM**  
**41 C.F.R. §§ 60-300.44(h); 60-741.44(h)**

WSU has developed and currently implements an audit and reporting system that addresses the following:

- 1) Measures the effectiveness of WSU's overall affirmative action program and whether the company is in compliance with specific obligations.
- 2) Indicates the need for remedial action.
- 3) Measures the degree to which WSU's objectives are being met.
- 4) Whether there are any undue hurdles for individuals with disabilities and protected veterans regarding company sponsored educational, training, recreational, and social activities. This will also include, but not limited, to the review of the on-line and electronic application system to determine their accessibility and ensuring that procedures for how to request reasonable accommodations are prominently displayed and that individuals with disabilities can readily obtain the needed accommodation.

**CHAPTER I: RESPONSIBILITY FOR IMPLEMENTATION**  
**41 C.F.R. §§ 60-300.44(i); 60-741.44(i)**

As part of its efforts to ensure equal employment opportunity to protected veterans and individuals with disabilities, WSU has designated specific responsibilities to various staff to ensure the AAP focuses on all components of the employment system. To that end, the President, the Chief Human Resource Officer, the Director of CCR, and those employed as supervisors and managers have undertaken the responsibilities described below.

President

The President is responsible for providing top management support for WSU's AAP. The President ensures that all employees and applicants know the commitment of Senior Management to EEO and affirmative action. Additional responsibilities include, but are not limited to:

- 1) Designating appropriate personnel with the responsibility for overseeing, administering, implementing, and monitoring WSU's AAP. Ensuring that these personnel are identified in writing.
- 2) Ensuring that designated personnel responsible for all AAP components are given the necessary authority and top management support and staffing to successfully implement their assigned responsibilities.
- 3) Imparting the personal direction that ensures total involvement and commitment to equal employment opportunity programs through WSU's AAP.

Chief Human Resource Officer (CHRO)

The CHRO is responsible for overall supervision of the implementation of personnel processes and other human resources functions. The CHRO ensures, through department managers and supervisors, that all relevant policies and procedures under the purview of Human Resource Services are adhered to. The CHRO's responsibilities include, but are not limited to, the following:

- 1) Maintaining system-wide management support and cooperation for WSU's AAP.
- 2) Assisting line management in arriving at solutions to EEO/AA problems.
- 3) Reviewing results of audit and reporting systems to assess the effectiveness of WSU's AA programs and to direct corrective actions where necessary.
- 4) Providing guidance to managers and supervisors in taking proper action to prevent employees from being harassed in any way, through one-on-one contact, training, referrals to appropriate grievance processes, and disciplinary action.
- 5) Ensuring that relevant staff, (i.e., managers, and supervisors) are aware that their work

performance is being evaluated in part on the basis of their equal employment opportunity efforts.

- 6) Ensure that transfer and promotion processes include a review of qualifications to ensure equitable opportunity, based on job-related employment practices.
- 7) In partnership with CCR, and relevant departments as appropriate, conduct periodic reviews of the effectiveness of the equal opportunity programs in: 1) training programs and hiring and promotion patterns, 2) facilities, and 3) sponsored educational, training, recreational, and social activities.
- 8) Ensuring that WSU has appropriate liaisons to organizations and community action groups for protected veterans and individuals with disabilities, in addition to ensuring that representatives are involved in community service programs of local organizations for protected veterans and individuals with disabilities.
- 9) Review, and assist managers and supervisors in reviewing, staff job descriptions and specifications, as well as faculty notices of vacancy, to ensure they are free of discriminatory provisions and artificial barriers, that all requirements are job-related, that they are realistic, and that they reflect the actual work requirements of the essential job duties.
- 10) Ensure that notice is periodically sent to all departmental human resource contacts of posters and policies required to be displayed. Human Resource Services also maintains a [webpage](#) that indicates the location of designated campus areas for required display of posters.
- 11) Ensure that all open recruitments include the required (pre and post) offer invitation to self-identify for protected veterans and individuals with disabilities. All positions posted through the [www.wsujobs.com](#) website include the pre-offer invitation and all offer letters include an invitation to self-identify post-offer.
- 12) Conduct periodic salary reviews to aid equity and retention (*see* BPPM 60.12) and provide support to the Office of the Provost to monitor and approve faculty salaries.

#### WSU Compliance and Civil Rights (CCR)

CCR is responsible for ensuring that the directives of the President regarding WSU's EEO/Affirmative Action responsibilities are implemented. CCR's duties include, but are not limited to, ensuring the following:

- 1) Presenting recommendations and procedural changes to Senior Management concerning EEO and affirmative action and ensuring that Senior Management and the AVP & Chief Compliance and Risk Officer is kept informed of WSU's compliance status.
- 2) Providing direction to WSU's employees, as necessary, to carry out all actions required to meet WSU's equal employment opportunity and affirmative action commitments.
- 3) Responsible for the design and effective implementation of the AAP.
- 4) Ensuring that the AAP is reviewed and updated annually.

- 5) Collaborating with Senior Management on EEO and AAP issues.
- 6) Developing, implementing, and maintaining audit and reporting systems to measure effectiveness of equal employment opportunity programs, including those that will
  - a. Indicate need for remedial action,
  - b. Determine degree to which goals and objectives have been obtained.
- 7) Advising management in the modification and development of WSU's policies to ensure the enhancement of equal employment opportunity for all employees and potential employees within existing equal employment opportunity guidelines.
- 8) Identifying problem areas and working with the CHRO to establish strategies, goals and objectives to solve these problems.
- 9) Ensure that the required post-offer invitation to self-identify for protected veterans and individuals with disabilities is communicated appropriately. CCR sends a supplemental reminder to all new hires within one month of hire.
- 10) WSU maintains a schedule to ensure that employees are re-surveyed regarding their disability status every five (5) years and send out reminder to employees, at least once during the five (5) year intervals, that they may voluntarily update their disability status at any time. All employees were invited to participate in a re-survey effort in 2021.
- 11) Serving as the liaison between WSU and enforcement agencies.
- 12) Keeping management informed of the latest developments in the equal employment opportunity area.
- 13) Assisting in review and revision of all policies, procedures, and rules to ensure they are not in violation of federal or state laws and regulations relating to EEO/Affirmative Action.
- 14) Ensuring WSU's VETS 4212 form is filed annually with the Veterans' Employment and Training Service (VETS)
- 15) Responsible for monitoring WSU's overall compliance with the AAP.

#### Managers and Supervisors

In their direct day-to-day contact with WSU's employees, managers and supervisors have assumed certain responsibilities to help WSU ensure compliance with equal employment opportunity programs and effective implementation of the AAP. These include, but are not limited to the following:

1. Adhere to WSU's equal employment opportunity and affirmative action policy.
  - A. Support and assist the CHRO and the Director of CCR in developing, maintaining, and successfully implementing the AAP.

- B. Take action to prevent discrimination and harassment of employees.
2. Encourage employees to seek opportunities that might lead to greater personal growth and value, and counsel them with respect to what is needed for upward mobility within the employment structure.
  3. Ensure that all interviews, offers of employment and/or wage commitments are consistent with WSU's policy.
  4. Implement the internal promotion and transfer of all employees under their supervision consistent with AAP goals and objectives.
  5. Assist in identifying problem areas and provide needed information for establishing and meeting department affirmative action goals and objectives.
  6. Encourage search committee members to utilize the recruitment training and toolkit provided by HRS.

**CHAPTER J: TRAINING**  
**41 C.F.R. §§ 60-300.44(j); 60-741.44(j)**

WSU provides training that is available to all employees involved in any way with the recruitment, selection, promotion, disciplinary actions, training, and related processes of individuals with disabilities or protected veterans to ensure commitment to the company's stated affirmative action goals.

**CHAPTER K: DATA COLLECTION ANALYSIS**  
**41 C.F.R. §§ 60-300.44(k); 60-741.44(k)**

WSU has adopted the current national percentage of veterans in the civilian labor force of 5.6% as its hiring benchmark for protected veterans. WSU will update its hiring benchmark as new data is published and updated via the OFCCP's website. The 5.6% hiring benchmark is applied to each job group within WSU.

WSU also adopted the current national utilization goal of 7.0% for qualified individuals with disabilities. WSU will update its utilization goal as new data becomes available, updated and published. The 7.0% utilization goal is applied to each job group within WSU.

Goals and/or benchmarks do not require that WSU 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 reasonably attainable by means of applying every good faith effort to make all aspects of the entire AAP work. A goal is a guidepost against which WSU, a community group, or a compliance agency can measure progress in remedying identified deficiencies in WSU's workforce.

WSU has collected the required data and conducted studies to identify areas of opportunities in the employment of protected veterans and individuals with disabilities. WSU will continue to monitor and update these studies periodically during each AAP year. In each case where the hiring benchmark for protected veterans and/or the utilization goal for individuals with disabilities are not met, affirmative actions, as appropriate, will be taken consistent with the activities mentioned in Chapter F (External Dissemination of Policy and Outreach and Positive Recruitment) and measures described in Chapter H (Internal Audit and Reporting) of this AAP.

See the ***Hiring Benchmark and Utilization Goals Analyses***.



**CHAPTER L: COMPENSATION**  
**41 C.F.R. §§ 60-300.21(i); 60-741.21(i)**

It is the policy of WSU 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.

WSU is also committed to abiding with 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. 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, including an investigation conducted by the employer, or (c) consistent with WSU's legal duty to furnish the information.