AFFIRMATIVE ACTION PROGRAM
FOR PROTECTED VETERANS AND
INDIVIDUALS WITH DISABILITIES

Contractor: Grand Valley State University
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4035 James H. Zumberge Hall
Allendale, MI 49501

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2. REVIEW OF PERSONNEL PROCESSES
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EQUAL EMPLOYMENT OPPORTUNITY POLICY
41 C.F.R. Section 60-300.44(a), 41 C.F.R. Section 60-741.44(a)

Grand Valley State University is an affirmative action/equal opportunity institution. It encourages diversity and provides equal opportunity in education, employment, all of its programs, and the use of its facilities. It is committed to protecting the constitutional and statutory civil rights of persons connected with the university.

Unlawful acts of discrimination or harassment by members of the campus community are prohibited. In addition, even if not illegal, acts are prohibited if they harass or discriminate against any university community member(s) through inappropriate limitation of access to, or participation in, educational, employment, athletic, social, cultural, or other university activities on the basis of age, color, disability, familial status, height, marital status, national origin, political affiliation, race, religion, sex/gender, sexual orientation, gender identity and expression, veteran status, or weight. Limitations are lawful if they are: directly related to a legitimate university purpose, required by law, lawfully required by a grant or contract between the university and the state or federal government, or addressing domestic partner benefits.

To achieve this goal, Grand Valley State University is dedicated to taking affirmative action to employ and advance in employment protected veterans and individuals with disabilities. All personnel actions, including compensation, benefits, recruitment, hiring, training, and promotion of persons in all job titles, will be administered without regard to protected veteran or disability status and all employment decisions are based solely on valid job requirements. In addition, employees and applicants are protected from harassment, threats, coercion, intimidation, or discrimination for:

1. Filing a complaint;
2. Assisting or participating in an investigation, compliance review, hearing, or any other activity related to the administration of VEVRAA, Section 503 or any other Federal, State, or local law requiring equal opportunity for protected veteran or individuals with disabilities;
3. Opposing any act or practice made unlawful by VEVRAA, Section 503 or its implementing regulations in this part, or any other Federal, State or local law requiring equal opportunity for protected veterans and individuals with disabilities; or
4. Exercising any other right protected by VEVRAA, Section 503 or its implementing regulations.

This EEO policy has the full support of Grand Valley State University’s President, who has assigned responsibility for its implementation to the Vice President for Inclusion and Equity, and EEO Coordinator, Associate Vice President for Affirmative Action/EEO and Title IX Coordinator. Grand Valley State University has designed and implemented an audit and reporting system to monitor and maintain its compliance with the Acts.

A copy of the Equal Employment Opportunity statement that reaffirms Grand Valley State University’s commitment to protected veterans and individuals with disabilities is posted in a form that is accessible and understandable to an individual with a disability.
Grand Valley State University reviews its employment procedures to ensure careful, thorough and systematic consideration of the job qualifications of protected veterans and applicants with disabilities for job vacancies filled either by hiring or promotion, and for all training opportunities offered or available. This review ensures that personnel procedures do not stereotype protected veterans and individuals with disabilities in a manner that limits their access to all jobs for which they are qualified. Applicants and employees with disabilities have equal access to personnel processes, including those implemented through information and communication technologies. Grand Valley State University periodically reviews its processes and makes any necessary modifications to ensure its affirmative action obligations are carried out. When protected veterans are considered for employment, only that portion of the individuals' military records, including discharge papers, that is relevant to the requirements of the position will be considered.

The following are some procedures that may be used to facilitate the review and evaluative process:

1. The application or personnel form of each protected veteran and applicant with a disability is annotated to identify each vacancy for which the applicant was considered and is retrievable for review for use in investigations and internal compliance activities;

2. The application or personnel form of each protected veteran and applicant with a disability includes the identification of each promotion and training program for which that employee was considered;

3. When a protected veteran employee or applicant is rejected for employment, promotion, or training, a statement of the reason is appended to the personnel file.

4. When an employee or applicant with a disability is rejected for employment, promotion, or training, a statement of the reason is appended to the personnel file along with a description of any reasonable accommodation considered.

5. When an employee or applicant is selected for hire, promotion, or training, and reasonable accommodation has been undertaken to enable the selection of an employee or applicant with a disability, the applicant form or personnel record contains a description of the reasonable accommodation.
PHYSICAL AND MENTAL QUALIFICATIONS
41 C.F.R. Section 60-300.44(c), 41 C.F.R. Section 60-741.44(c)

Grand Valley State University reviews all physical and mental job qualification requirements as openings
occur to ensure to the extent that qualification requirements tend to screen out qualified disabled veterans
and qualified individuals with disabilities, that they are job-related and consistent with business necessity
and the safe performance of the job.

To the extent that physical or mental job qualification requirements tend to screen out qualified disabled
veterans and qualified individuals with disabilities in the selection of employees or applicants for
employment or other changes in employment status such as promotion or training, Grand Valley State
University assures that the requirements are related to the specific job(s) for which the individual is being
considered and are consistent with business necessity and the safe performance of the job.
HARASSMENT
41 C.F.R. Section 60-300.44(e), 41 C.F.R. Section 60-741.44(e)
REASONABLE ACCOMMODATION
41 C.F.R. Section 60-300.44(d), 41 C.F.R. Section 60-741.44(d)

Grand Valley State University makes reasonable accommodations to the physical and mental limitations of employees or applicants to the extent that such accommodations do not impose an undue hardship on the conduct of its business. When an employee known to be a disabled veteran or an employee with a known disability has significant difficulty performing his or her job and it is reasonable to conclude that the performance problem may be related to the known disability, the employee is confidentially notified of the performance problem and asked if the problem is related to the disability. If the employee indicates that the performance problems are related to his or her disability, the employee is asked if reasonable accommodation is needed.

Grand Valley State University develops and maintains procedures to ensure that its employees are not harassed because of their status as a protected veteran or on the basis of a disability. Information on filing a complaint of harassment or discrimination is posted on the university website at https://www.gvsu.edu/cms4/asset/92332B37-04FB-CE3C-7F14A5A4BE2F95E9/anti-harassment_policy_revised_11_201211.pdf.
EXTERNAL DISSEMINATION OF POLICY
41 C.F.R. Section 60-300.44(f), 41 C.F.R. Section 60-741.44(f)

Grand Valley State University undertakes appropriate outreach and positive recruitment activities that are reasonably designed to effectively recruit protected veterans and individuals with disabilities, such as the following:

1. Grand Valley State University incorporates the Equal Opportunity Clause regarding protected veterans and individuals with disabilities in its purchase orders, leases and contracts as required by law, executive order and regulation. Written notification of the Equal Opportunity Policy is sent to all subcontractors, vendors, and suppliers requesting appropriate action on their part.

2. Grand Valley State University notifies all applicants of the EEO policy and invites them to self-identify. Application forms state Grand Valley State University's commitment to equal employment opportunity. All employment advertisements and notices to recruitment sources state this EEO policy.

3. Outreach and recruitment activities that may be undertaken as needed by Grand Valley State University include enlisting the assistance and support of the following persons and organizations in recruiting, and developing on-the-job training opportunities for protected veterans and individuals with disabilities, in order to fulfill its commitment to provide equal employment opportunity for such individuals:
   a. Veteran Employment Services, State of Michigan, Contact: Chris Porter LER
   b. U.S. Department of Veterans Affairs (Vet Success), Contact: Michael A. Poyma

4. All employment openings (except executive and top management, positions that are filled from within, and positions lasting three days or less) are listed at the appropriate state employment services office. Formal briefing sessions and facility tours may be conducted with representatives from recruiting sources to explain current and future job openings, position descriptions, worker specifications, and the selection process. Follow-up with these resources and feedback on disposition of applicants are conducted when appropriate.

5. Grand Valley State University develops internal communication of these outreach efforts in a manner that fosters understanding, acceptance, and support among executive management, supervisors, and all other employees.

6. Meaningful contacts are established with veteran's service organizations and organizations for individuals with disabilities for such purposes as advice, technical assistance and referral of potential employees. Such assistance may consist of advice concerning proper placement, recruitment, training and reasonable accommodation.

7. Good faith efforts are made to consider protected veterans and applicants with known disabilities for all available positions for which they may be qualified, to the extent practicable.

8. Recruitment at educational institutions will include efforts to reach students who are protected veterans.

9. Recruitment programs established with schools incorporate efforts to reach students with disabilities. Efforts may be made to participate in work-study programs with rehabilitation facilities and schools specializing in training or educating individuals with disabilities.
10. When appropriate, efforts may be made to participate in work-study programs with Department of Veterans Affairs rehabilitation facilities which specialize in training or educating disabled veterans.

11. Efforts are made to include individuals with disabilities when employees are pictured in consumer, promotional or help wanted advertisements.
Grand Valley State University each year reviews the outreach and recruitment efforts it has taken over the previous twelve months to evaluate their effectiveness in identifying and recruiting qualified protected veterans and qualified individuals with disabilities. Each evaluation is documented, including at a minimum the criteria used to evaluate the effectiveness of each effort and the conclusion as to whether each effort and the totality of the efforts are effective. Among these criteria are the Data Collection Analysis for the current year and the two most recent previous years. If Grand Valley State University concludes the totality of its efforts are not effective in identifying and recruiting qualified protected veterans and qualified individuals with disabilities, alternative outreach and recruitment efforts are identified and implemented.

Grand Valley State University concludes that each and the totality of its efforts are effective in identifying and recruiting qualified protected veterans and qualified individuals with disabilities.
INTERNAL DISSEMINATION OF POLICY
41 C.F.R. Section 60-300.44(g), 41 C.F.R. Section 60-741.44(g)

Grand Valley State University has developed the following internal procedures to communicate its obligation to engage in affirmative action efforts to employ and advance in employment protected veterans and qualified individuals with disabilities. These procedures are designed to foster understanding, acceptance, and support among executive, management, supervisory and other employees and to encourage such persons to take the necessary actions to meet this obligation.

1. Grand Valley State University Notices. The EEO policy statement is posted on the employee bulletin board and/or electronically in a manner and place that ensures that protected veterans and individuals with disabilities are informed of its contents. This notice states the name of the EEO Coordinator, the support of top-level management toward this policy, and to whom questions, comments, or complaints should be directed. A statement is included that employees are protected from coercion, intimidation, interference or discrimination for filing a complaint or assisting in an investigation under the Acts. All required state and federal EEO notices are also posted on bulletin boards.

2. Union Contracts. A non-discrimination clause is included in any union contracts and any such contracts are reviewed to ensure that they are non-discriminatory. Grand Valley State University will notify union officials and/or employee representatives of the contractor's policy and request their cooperation.

3. Other procedures that may be implemented as needed:
   a. Grand Valley State University’s overall commitment, top-level management support, and implementation of the plan are discussed with management personnel, making clear the chief executive officer's support for the affirmative action policy;
   b. All employees and prospective employees are informed of Grand Valley State University’s commitment to engage in affirmative action to increase employment opportunities for protected veterans and individuals with disabilities;
   c. Grand Valley State University's affirmative action policy is publicized in the Board of Trustee’s Administrative Manual as well as on the university’s website, printed catalogs, and other media;
   d. The policy is discussed thoroughly in both employee orientation and management training programs;
   e. When employees are featured in employee handbooks or similar publications for employees, Grand Valley State University includes protected veterans and individuals with disabilities.
AUDIT & REPORTING SYSTEM
41 C.F.R. Section 60-300.44(h), 41 C.F.R. Section 60-741.44(h)

Grand Valley State University has designed, implemented and documented an audit and reporting system that:

1. Measures the effectiveness of the affirmative action program.
2. Indicates any need for remedial action.
3. Determines the degree to which the objectives have been attained.
4. Determines whether protected veterans and individuals with known disabilities have the opportunity to participate in all company sponsored educational, training, recreational and social activities.
5. Measures compliance with the affirmative action program's specific obligations.

Where the affirmative action program is found to be deficient, corrective action is taken to bring the program into compliance.
RESPONSIBILITY FOR IMPLEMENTATION
41 C.F.R. Section 60-300.44(i), 41 C.F.R. Section 60-741.44(i)

The Associate Vice President for Affirmative Action & Title IX Officer has been designated to direct the activities of the affirmative action program. Associate Vice President for Affirmative Action & Title IX Officer has the full support of in carrying out the Grand Valley State University affirmative action policy and is responsible for:

1. Developing policy statements, affirmative action programs, and internal and external communication to include discussions with managers, supervisors and employees to ensure the policies are followed;

2. Advising managers and supervisors that their work performance is evaluated, in part, on the basis of their affirmative action efforts;

3. Identifying and discussing with management any problem areas;

4. Developing with management solutions for any identified problem areas;

5. Serving as a liaison between Grand Valley State University and community groups, governmental agencies and vocational rehabilitation organizations;

6. Maintaining an audit and reporting system to monitor the progress of the affirmative action program;

7. Informing management of the latest developments in the affirmative action and equal employment opportunity area;

8. Serving as a liaison between Grand Valley State University and organizations for protected veterans and individuals with disabilities;

9. Assisting in career counseling for protected veterans employees and employees with disabilities;

10. Ensuring that the policy statement and required posters are posted on bulletin boards and/or electronic postings; and

11. Ensuring that employees placed through these policies are not harassed.
TRAINING
41 C.F.R. Section 60-300.44(j), 41 C.F.R. Section 60-741.44(j)

All personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes are trained to ensure the implementation of our commitments made in this affirmative action program.
DATA COLLECTION ANALYSIS
41 C.F.R. Section 60-300.44(k), 41 C.F.R. Section 60-741.44(k)

Grand Valley State University has documented the following computations or comparisons pertaining to applicants and hires on an annual basis and maintain them for a period of three (3) years:

1. The number of applicants who self-identified as protected veterans pursuant to § 60-300.42(a), or who are otherwise known as protected veterans;

2. The number of applicants who self-identified as individuals with disabilities pursuant to § 60-741.42(a), or who are otherwise known to be individuals with disabilities;

3. The total number of job openings and total number of jobs filled;

4. The total number of applicants for all jobs;

5. The number of protected veteran applicants hired;

6. The number of applicants with disabilities hired; and

7. The total number of applicants hired.

An online applicant tracking system is used to maintain this information.
Grand Valley State University
Data Collection Analysis of Protected Veterans and Individuals with Disabilities
41 CFR Section 60-300.44(k) and 60-741.44(k)
Total Workforce: 9/1/13 to 8/31/14

<table>
<thead>
<tr>
<th></th>
<th>Applicants</th>
<th>Applicant Ratio</th>
<th>Hires &amp; Promotions</th>
<th>Hire &amp; Promo Ratio</th>
<th>Total Openings</th>
<th>Total Jobs Filled</th>
<th>Jobs Filled Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Workforce</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Veterans</td>
<td>0</td>
<td>0.0%</td>
<td>0</td>
<td>0.0%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Disabled</td>
<td>0</td>
<td>0.0%</td>
<td>0</td>
<td>0.0%</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td>11281</td>
<td>0.0%</td>
<td>159</td>
<td>0.0%</td>
<td>159</td>
<td>159</td>
<td>100.0%</td>
</tr>
</tbody>
</table>
The benchmark is not a rigid and inflexible quota which must be met, nor is it to be considered either a ceiling or a floor for the employment of particular groups. The purpose of establishing benchmarks is to create a quantifiable method by which Grand Valley State University can measure its progress toward achieving equal employment opportunity for protected veterans. Benchmarks will be set on an annual basis using one of the two mechanisms described below:

1. Establish a benchmark equaling the national percentage of veterans in the civilian labor force, which will be published and updated annually on the OFCCP website; or

2. Establish a benchmark by taking into account: (i) the average percentage of veterans in the civilian labor force in the State(s) where the contractor is located over the preceding three years, as calculated by the Bureau of Labor Statistics and published on the OFCCP website; (ii) the number of veterans, over the previous four quarters, who were participants in the employment service delivery system in the State where the contractor is located, as tabulated by the Veterans' Employment and Training Service and published on the OFCCP website; (iii) the applicant ratio and hiring ratio for the previous year, based on the data collected pursuant to § 60-300.44(k); (iv) the contractor's recent assessments of the effectiveness of its external outreach and recruitment efforts, as set forth in § 60-300.44(f)(3); and (v) any other factors, including but not limited to the nature of the contractor's job openings and/or its location, which would tend to affect the availability of qualified protected veterans.

Grand Valley State University has chosen to establish a benchmark equaling the national percentage of Veterans in the civilian labor force.
Hiring Benchmark for Protected Veterans
41 CFR Section 60-300.45

Veteran Hiring Benchmark: 7.2%
The utilization goal is not a rigid and inflexible quota which must be met, nor is it to be considered either a ceiling or a floor for the employment of particular groups. OFCCP has established a utilization goal for employment of qualified Individuals with disabilities for each job group in the contractor's workforce, or for the contractor's entire workforce where the workforce consists of 100 or less employees. The purpose of the utilization goal is to establish a benchmark against which the contractor must measure the representation of individuals within each job group in its workforce, or within the contractor's entire workforce. Grand Valley State University has evaluated utilization of individuals with disabilities in each job group, or in its entire workforce.

See Utilization Summary of Individuals with Disabilities.

During 2014, the current workforce at Grand Valley State University will be asked to voluntarily identify their disability status; and these data will be reported in next year’s AAP.
IDENTIFICATION OF PROBLEM AREAS
41 C.F.R. Section 60-741.45(e)

When the percentage of individuals with disabilities in one or more job groups, or in our entire workforce if the workforce is 100 or fewer employees, is less than the utilization goal, Grand Valley State University takes steps to determine whether and where impediments to equal employment opportunity exist. When making this determination, we assess our personnel processes, the effectiveness of our outreach and recruitment efforts, the results of our affirmative action program audit, and any other areas that might affect the success of the affirmative action program.

Grand Valley State University has not found any impediments to equal employment opportunity in our personnel processes, outreach and recruitment efforts or any other area that might affect the success of our affirmative action program.
ACTION ORIENTED PROGRAMS
41 C.F.R. Section 60-741.45(f)

As needed, Grand Valley State University has developed action-oriented programs designed to correct any identified problems areas. These action-oriented programs may include the modification of personnel processes to ensure equal employment opportunity for individuals with disabilities, alternative or additional outreach and recruitment efforts and/or other actions designed to correct the identified problem areas and attain the established goal.
Utilization Summary of Individuals with Disabilities
(By Job Group using the Any Difference Rule)
41 CFR Section 60-741.45

<table>
<thead>
<tr>
<th>Employees</th>
<th>Disabled</th>
<th>Disabled Availability %</th>
<th>Disabled Utilization %</th>
<th>Met Goal?</th>
</tr>
</thead>
<tbody>
<tr>
<td>101 : University Appointing Officers</td>
<td>8</td>
<td>0</td>
<td>7.0</td>
<td>0.0</td>
</tr>
<tr>
<td>102 : Academic Related Management</td>
<td>17</td>
<td>0</td>
<td>7.0</td>
<td>0.0</td>
</tr>
<tr>
<td>103 : Business &amp; Univ Relations Management</td>
<td>13</td>
<td>0</td>
<td>7.0</td>
<td>0.0</td>
</tr>
<tr>
<td>104 : Other Administrators</td>
<td>11</td>
<td>0</td>
<td>7.0</td>
<td>0.0</td>
</tr>
<tr>
<td>201 : Art &amp; Music Faculty</td>
<td>46</td>
<td>0</td>
<td>7.0</td>
<td>0.0</td>
</tr>
<tr>
<td>202 : Humanities Faculty</td>
<td>158</td>
<td>0</td>
<td>7.0</td>
<td>0.0</td>
</tr>
<tr>
<td>203 : Communications Faculty</td>
<td>31</td>
<td>0</td>
<td>7.0</td>
<td>0.0</td>
</tr>
<tr>
<td>204 : Social Science Faculty</td>
<td>37</td>
<td>0</td>
<td>7.0</td>
<td>0.0</td>
</tr>
<tr>
<td>205 : Psychology Faculty</td>
<td>39</td>
<td>0</td>
<td>7.0</td>
<td>0.0</td>
</tr>
<tr>
<td>207 : Sciences Faculty</td>
<td>126</td>
<td>0</td>
<td>7.0</td>
<td>0.0</td>
</tr>
<tr>
<td>208 : Math, Physics &amp; Statistics Faculty</td>
<td>67</td>
<td>0</td>
<td>7.0</td>
<td>0.0</td>
</tr>
<tr>
<td>209 : Movement Science Faculty</td>
<td>17</td>
<td>0</td>
<td>7.0</td>
<td>0.0</td>
</tr>
</tbody>
</table>

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## Utilization Summary of Individuals with Disabilities

### (By Job Group using the Any Difference Rule)

<table>
<thead>
<tr>
<th>Employees</th>
<th>Disabled</th>
<th>Disabled Availability %</th>
<th>Disabled Utilization %</th>
<th>Met Goal?</th>
</tr>
</thead>
<tbody>
<tr>
<td>210: Criminal Justice, Public Adm &amp; Rel Faculty</td>
<td>42</td>
<td>0</td>
<td>7.0</td>
<td>0.0</td>
</tr>
<tr>
<td>211: Social Work Faculty</td>
<td>16</td>
<td>0</td>
<td>7.0</td>
<td>0.0</td>
</tr>
<tr>
<td>212: Education Faculty</td>
<td>48</td>
<td>0</td>
<td>7.0</td>
<td>0.0</td>
</tr>
<tr>
<td>213: Comp Sci/Info Systems Faculty</td>
<td>26</td>
<td>0</td>
<td>7.0</td>
<td>0.0</td>
</tr>
<tr>
<td>214: Engineering Faculty</td>
<td>30</td>
<td>0</td>
<td>7.0</td>
<td>0.0</td>
</tr>
<tr>
<td>215: Health Professionals Faculty</td>
<td>63</td>
<td>0</td>
<td>7.0</td>
<td>0.0</td>
</tr>
<tr>
<td>216: Nursing Faculty</td>
<td>30</td>
<td>0</td>
<td>7.0</td>
<td>0.0</td>
</tr>
<tr>
<td>217: Business Faculty</td>
<td>78</td>
<td>0</td>
<td>7.0</td>
<td>0.0</td>
</tr>
<tr>
<td>218: Library Faculty</td>
<td>26</td>
<td>0</td>
<td>7.0</td>
<td>0.0</td>
</tr>
<tr>
<td>301: Business Admin/Accounting</td>
<td>98</td>
<td>0</td>
<td>7.0</td>
<td>0.0</td>
</tr>
<tr>
<td>302: Computer Services Professional</td>
<td>67</td>
<td>0</td>
<td>7.0</td>
<td>0.0</td>
</tr>
<tr>
<td>303: Academic &amp; Student Services</td>
<td>323</td>
<td>0</td>
<td>7.0</td>
<td>0.0</td>
</tr>
</tbody>
</table>

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