

# WESTERN ILLINOIS UNIVERSITY AFFIRMATIVE ACTION PLAN UPDATE

---

Plan Effective Date: 10/01/2018

Plan Expiration Date: 10/01/2019

EEO Administrator: Chocoletta Simpson  
Director

Prepared by: Tami McCoy  
Equal Opportunity Officer  
  
Chocoletta Simpson  
Director

Establishment's Name: Western Illinois University

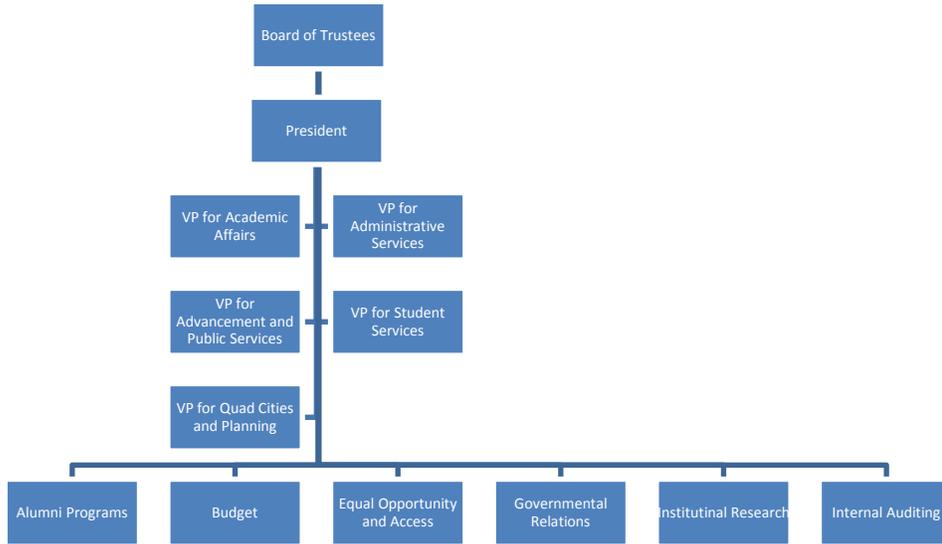
Establishment's Address: 1 University Circle  
Macomb Illinois 61455

---

Jack Thomas, PhD

## Table of Contents

President’s Statement of Commitment.....	6
Introduction.....	7
History of the University.....	7
Organizational Chart (Limited) .....	7



WESTERN ILLINOIS UNIVERSITY AFFIRMATIVE ACTION PROGRAM FOR MINORITIES AND WOMEN.....	8
Affirmative Action Plan Requirement.....	9
Equal Opportunity and Affirmative Action .....	9
Policy Statement .....	9
Policy Distribution .....	10
Equal Opportunity Clause.....	10
Administration & Monitoring .....	10
Establishment of Responsibilities for Implementation of the Written Affirmative Action Program (41 CFR 60-2.17(a)) .....	10
Designation of Responsibilities of EEO Administrator (41 CFR 60-2.17(a)) .....	10
The Responsibilities of the University’s Management to Ensure Implementation of the AAP (41 CFR 60-2.17(a)) .....	11
Identification of Problem Areas (41 CFR 60-2.17(b)) .....	11
Placement Goals: .....	11
Review of Employment Decisions:.....	12
Review of Hires/Promotions:.....	12

Review of Terminations:.....	12
The Development and Execution of Action-Oriented Programs (41 CFR 60-2.17(c)).....	13
Internal Audit and Reporting Systems (41 CFR 60-2.17(d)) .....	14
Plan Dissemination .....	15
Internal .....	15
External.....	16
Equal Opportunity and Access Affirmative Action Program Annual Update – October 2018.....	16
Data - New Hires .....	18
Tenure Track Faculty Positions Filled.....	18
Other Instructional Positions Filled.....	18
Administrative Positions Filled.....	19
Civil Service Positions Filled.....	19
<b>New Hire Summary</b> .....	20
Analyses (41 CFR 60-2.12 – 60-2.15).....	20
Workforce Agency Report.....	20
Job Group Analysis.....	20
Utilization Analysis.....	20
Placement Goals Reports .....	22
Accomplishment of Prior Year Placement Goals (41 CFR 60-1.40(c)) 41 CFR 60-1.12(b), -2.1(c) and -2.16 .....	22
Current Placement Goal Report (Detailed).....	25
<b>Methodology:</b> .....	25
<b>Analysis:</b> .....	26
Faculty Underrepresentation by Department: .....	28
Additional Findings:.....	28
Recommendations:.....	28
Training.....	28
Discrimination Complaints.....	29
Progress.....	29
Goals .....	29
WESTERN ILLINOIS UNIVERSITY AFFIRMATIVE ACTION PROGRAM.....	30
FOR PROTECTED VETERANS.....	30

Policy Statement (41 CFR §60-300.44 (a)) .....	31
Review of Personnel Processes.....	32
Physical and Mental Qualifications .....	32
Reasonable accommodation to physical and mental limitations.....	33
Harassment and Discrimination .....	33
External Dissemination of Policy, Outreach, and Positive Recruitment.....	33
Assessment of external outreach and recruitment efforts.....	34
Recordkeeping Obligation.....	34
Internal Dissemination of Policy.....	34
Audit and Reporting Systems.....	35
Responsibility for Implementation.....	36
<i>Responsibilities of the EEO Administrator</i> .....	36
Training.....	37
Data Collection Analysis.....	37
Benchmarks for hiring (§60-300.45) .....	38
Summary.....	38
WESTERN ILLINOIS UNIVERSITY AFFIRMATIVE ACTION PROGRAM.....	40
FOR INDIVIDUALS WITH DISABILITIES .....	40
Review of Personnel Processes.....	42
Physical and Mental Qualifications .....	42
Reasonable accommodation to physical and mental limitations.....	43
Harassment and Discrimination .....	43
External Dissemination of Policy, Outreach, and Positive Recruitment.....	43
Assessment of external outreach and recruitment efforts. ....	44
Recordkeeping Obligation.....	44
Internal Dissemination of Policy.....	44
Audit and Reporting Systems.....	45
Responsibility for Implementation.....	46
<i>Responsibilities of the EEO Administrator</i> .....	46
Training.....	47
Data collection analysis .....	47

Analysis:.....	47
Utilization Goals (§60-741.45) .....	47
Analysis:.....	48
Annual Evaluation .....	48
Identification of Problem Areas .....	49
Utilization Goals: .....	49
Review of Employment Decisions:.....	49
Review of Hires/Promotions:.....	49
Review of Terminations:.....	49
The Development and Execution of Action-Oriented Programs.....	50

## President's Statement of Commitment

To Members of the Western Illinois University Campus Community:

In an effort to reaffirm our commitment to equal opportunity and access, the Office of the President and the administration of Western Illinois University (WIU) are highly committed to demonstrating and supporting our core values, of Academic Excellence, Educational Opportunity, Personal Growth, and Social Responsibility, by celebrating the richness of our diverse community and providing an environment that is inclusive and welcoming to all. As President of Western Illinois University, I want to emphasize that diversity is an integral part of our institution's strategic plan: *Higher Values in Higher Education*.

To that end, WIU provides fair and equal employment opportunities for all individuals regardless of sex, race, color, sexual orientation, gender identity, gender expression, religion, age, marital status, national origin, disability, or veteran status. On behalf of the campus community, we collectively adhere to ensuring that the policies and procedures within our Affirmative Action Plan are utilized properly to meet our commitment to equal opportunity and access. WIU holds diversity within our academic, professional, and environmental culture as a high priority and as a necessity. Additionally, Western emphasizes that equal employment opportunities must be extended to all individuals with regard to: hiring, placement, promotion, reclassification, transfer, recruitment, return from layoff, compensation, and any other aspect of the employment evaluation process.

As President of WIU, I am committed to providing exemplary professional and personal examples which reflect my own and the University's high standards of equality. Likewise, I encourage and charge all members of the University community to maintain proactive stances when engaging with others with regard to diversity matters at the institution. WIU respects the dignity and worth of all individuals, which should result in the equitable treatment of all faculty, staff, and students.

WIU's Office of Equal Opportunity and access will continue to maintain the policies and procedures WIU has implemented to articulate our diversity initiatives through our Affirmative Action Plan. Our commitment will exceed the standards required for compliance. The WIU Affirmative Action Plan will be available to all constituencies on the University webpage. For additional information, please contact Chocoletta Simpson, Director, Equal Opportunity and Access, 1 University Circle, Sherman Hall 203, Macomb, Illinois 61455, (309)298-1977.

Sincerely,

Jack Thomas, Ph.D.  
President

## Introduction

### History of the University

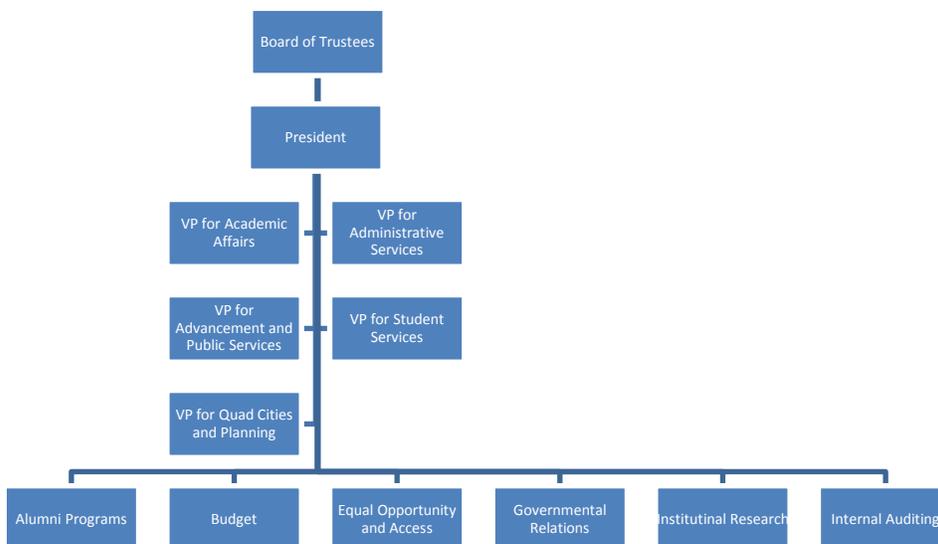
**Western Illinois University (WIU)** is a public, coeducational institution of higher learning located in Macomb, Illinois. WIU was founded in 1899 as Western Illinois State Normal School. Instruction began in 1902. Like many similar institutions of the time, Western Illinois State Normal School focused on teacher training for its relatively small body of students. As the normal school grew, it evolved into a four year teachers college in 1917 and became Western Illinois State Teachers College in 1921. In 1957 the college was elevated to university status. Today, Western Illinois University is composed of two campuses that provide a wide range of academic programs for nearly 11,000 students. While the main campus is in Macomb, Western Illinois University – Quad Cities is located in Moline, Illinois.

Western Illinois University is composed of four academic colleges: Arts & Sciences, Business & Technology, Education & Human Services, and Fine Arts & Communication, in addition to an Honors College and the School of Distance Learning, International Studies and Outreach which includes nontraditional programs.

The University offers 66 baccalaureate degrees, 19 post-baccalaureate certificates, 38 master's degree programs, 2 undergraduate certificates, 7 pre-professional programs, and doctoral degrees in Educational Leadership (Ed. D.) and Environmental Science (Ph.D).

(Source: <http://www.wiu.edu/academics/>)

### Organizational Chart (Limited)



**WESTERN ILLINOIS UNIVERSITY AFFIRMATIVE ACTION PROGRAM  
FOR MINORITIES AND WOMEN**

## **Affirmative Action Plan Requirement**

Executive Order 11246, the Rehabilitation Act, and the Vietnam Era Veterans' Readjustment Assistance Act are federal laws that require federal contractors and subcontractors that employ 50 or more employees and enter into at least one contract of \$50,000 or more with the federal government to prepare and maintain a written affirmative action program for the recruitment, hiring, and promotion of minorities, women, disabled individuals, and protected veterans. (See 41 C.F.R. §§60-1.40, 60-250.40, 60-741.40.)

WIU's Affirmative Action Plan sets forth the University's commitment to equal opportunity and affirmative action and outlines a comprehensive program of activities for recruitment, hiring, and promotion for minorities and women. The Plan also includes active programs for individuals with disabilities and protected veteran's categories.

This Affirmative Action Plan is available for inspection by any employee or applicant for employment upon request, during normal business hours, in the Office of Equal Opportunity and Access.

Questions may be addressed to Chocoletta Simpson or Tami McCoy, Office of Equal Opportunity and Access, Sherman Hall Room 203, Macomb, IL or by phone at 309-298-1977.

## **Equal Opportunity and Affirmative Action**

### **Policy Statement**

The University originally adopted an affirmative action and equal opportunity policy in November 1972. This policy, which has undergone review and revision over the years, serves as the official statement of commitment to the spirit and the letter of these concepts in all employment decisions. The President has reviewed this policy and reaffirmed the University's position with regard to affirmative action and equal opportunity.

The policy now reads as follows:

“Western Illinois University complies fully with all applicable federal and state nondiscrimination laws, orders, and regulations. The University is committed to providing equal opportunity and an educational and work environment for its students, faculty, and staff that is free from discrimination based on sex, race, color, sexual orientation, gender identity and gender expression, religion, age, marital status, national origin, disability, or veteran status.”

Further, the University is committed to a comprehensive Affirmative Action program that ensures access and equity in educational programs, activities, and employment.

## **Policy Distribution**

The EEO Policy statement is posted online and is available in print in the Office of Equal Opportunity and Access.

### **Equal Opportunity Clause**

Pursuant to 41 C.F.R. section 60-1.4 and Western Illinois University's commitment to fair labor practices, WIU will continue to include the equal opportunity clause in all purchase orders, leases, and contracts. WIU will also reiterate its equal opportunity commitment in all vacancy announcements, employment advertisements, and application forms.

## **Administration & Monitoring**

The Equal Opportunity & Access Office is responsible for administering and monitoring Western Illinois University's Equal Opportunity/Affirmative Action policies and procedures. Inquiries about or complaints alleging violation of these policies should be directed to Chocoletta Simpson, Director of Equal Opportunity & Access, 309/298-1977, ca-simpson@wiu.edu.

The Director serves as the Coordinator for the Americans with Disabilities Act (ADA) and Title IX of the Educational Amendments of 1972 and all implementing regulations.

## **Establishment of Responsibilities for Implementation of the Written Affirmative Action Program (41 CFR 60-2.17(a))**

### **Designation of Responsibilities of EEO Administrator (41 CFR 60-2.17(a))**

The EEO Administrator has the primary Executive administration responsibility, authority, and resources for ensuring full compliance with the provisions of E.O. 11246, as amended, and its implementing regulations. The responsibilities of the EEO Administrator include, but are not necessarily limited to, the following:

1. Developing EEO policy statements, Affirmative Action Programs, and internal and external communication procedures;
2. Assisting in the identification of AAP/EEO problems;
3. Assisting Executive administration in arriving at effective solutions to AAP/EEO problems;
4. Designing and implementing an internal audit and reporting system that:
  - a. Measures the effectiveness of Western Illinois University's program;
  - b. Determines the degree to which AAP goals and objectives are met; and
  - c. Identifies the need for remedial action;

5. Keeping Western Illinois University's executive administration informed of equal opportunity progress and reporting potential problem areas within the university through reports;
6. Reviewing the university's AAP for qualified minorities and women to ensure that the policy is understood and followed in all personnel activities;
7. Auditing the contents of the university's bulletin board to ensure compliance information is posted and up-to-date; and
8. Serving as liaison between Western Illinois University and enforcement agencies.

### **The Responsibilities of the University's Management to Ensure Implementation of the AAP (41 CFR 60-2.17(a))**

In implementing this written Affirmative Action Program, the responsibilities of the University's supervisors and managers working with the EEO Administrator include, but are not necessarily limited to, the following:

1. Assisting in the identification of problem areas, formulating solutions, and establishing departmental goals and objectives when appropriate;
2. Reviewing the qualifications of all applicants and employees to ensure qualified individuals are treated in a nondiscriminatory manner when hiring, promotion, transfer, and termination actions occur; and
3. Reviewing the job performance of each employee to assess whether personnel actions are justified based on the employee's performance of his or her duties and responsibilities.

### **Identification of Problem Areas (41 CFR 60-2.17(b))**

In addition, Western Illinois University performs in-depth analysis of its total employment process to determine if there are areas where minority and/or female groups may face impediments to equal opportunity. The following analyses are conducted in order to reveal any potential problem areas:

**Placement Goals:** An analysis of incumbency versus availability is performed to determine whether there are problems of minority or female utilization. Whenever a problem exists, Placement Goals are set (see the Placement Goals report which follows this section). Western Illinois University employs the "80 percent rule" methodology to determine whether a disparity exists. Pursuant to this approach, in any job group with more than two percent availability, a disparity exists whenever the disparity of females or minorities in a job group is less than 80 percent of the final availability percentage of the defined workforce. For those groups in which more than one position exists, placement goals are established.

For job groups that have Placement Goals, steps will be taken to encourage and increase the percentage of qualified females and/or minorities applying for positions both externally and internally. These steps may include, as appropriate, but are not limited to the following:

1. Recruiting at colleges and universities with a significant percentage of minority and female students;
2. Publishing job advertisements in newspapers and/or magazines that target females and/or minorities;
3. Offering mentorship programs for female and minority employees; particularly, the Affirmative Action Administrative Internship Program (AAAIP);
4. Offering job training to females and minorities currently employed by the university in order to increase their chances of advancing within the university; particularly, the Illinois Trainee Program, implemented through the State Universities Civil Service System;
5. Offering tuition waivers to employees to obtain educational training that will increase their chances of advancing within the university;
6. Using recruitment techniques that specifically target females and minorities; and
7. Continuing to use the services of the Illinois Employment Service.

**Review of Employment Decisions:** Review of employment decisions are made in order to determine whether females/minorities are selected at a less favorable rate than males/non-minorities.

**Review of Hires/Promotions:** Whenever females/minorities are selected at a lower rate than males/non-minorities, a review of the applicant flow is conducted to determine possible reasons why females/minorities were not selected at a more favorable rate. If the university is attracting fewer than expected females/minorities that fit the qualifications for the job groups, good faith efforts will be put into place to attempt to improve the applicant flow of qualified females/minorities.

**Review of Terminations:** For non-voluntary terminations, if females/minorities are being terminated at a higher rate than males/non-minorities, a review of the employee files will be made to ensure that the university is applying its policies and procedures for termination equally for protected as well as non-protected classes.

## **The Development and Execution of Action-Oriented Programs (41 CFR 60-2.17(c))**

Action programs have been instituted to eliminate identified problem areas and to help achieve specific Affirmative Action goals. These programs include, but are not limited to, the following:

1. The Department of Human Resources conducts annual analyses of a third of the total job descriptions at Western Illinois University to ensure they accurately reflect job functions;
2. Making position announcements available to recruiting sources and all members of the selection committee involved in the recruiting, screening, selection and promotion processes;
3. Evaluating the total selection process to ensure freedom from bias through:
  - a. Reviewing position announcements and other pre-employment forms to ensure information requested is job-related;
  - b. Evaluating selection methods that may have a disparate impact to ensure that they are job-related and consistent with business necessity; and,
  - c. Training selection committees on the search and screening process;
4. Using techniques to improve recruitment and increase the flow of qualified applicants, including minority and female applicants. Western Illinois University has implemented the following actions:
  - a. Include the phrase “Western Illinois University is an Affirmative Action/Equal Opportunity employer and has a strong institutional commitment to diversity. In that spirit, we are particularly interested in receiving applications from a broad spectrum of people, including minorities, women, and persons with disabilities. WIU has a non-discrimination policy that includes sex, race, color, sexual orientation, gender identity and gender expression, religion, age, marital status, national origin, disability, or veteran status.” or a shortened tagline in all printed employment advertisements;
  - b. Place position advertisements in news media geared toward minorities and women;
  - c. Disseminate information on job opportunities to organizations representing minorities, women and employment development agencies in pertinent disciplines when job opportunities occur;
  - d. Encourage all employees to refer qualified applicants;
  - e. Actively recruit at job fairs, as well as junior colleges, colleges and universities with predominantly minority or female enrollments; and
  - f. Request Illinois employment agencies to refer qualified minorities and women.

5. Ensuring that all employees are given equal opportunity for promotion. This is achieved by:
  - a. Posting promotional opportunities;
  - b. Evaluating selection process

### **Internal Audit and Reporting Systems (41 CFR 60-2.17(d))**

The university believes that one of the most important elements in effectively implementing a written Affirmative Action Program is an adequate internal audit and reporting system. Through this system, the Office of Equal Opportunity and Access will work in conjunction with the Office of Internal Auditing to ensure that the total program can be monitored for effectiveness, and executive administration can be kept informed of changes and progress. Western Illinois University's audit and reporting system is designed to:

1. Measure the effectiveness of the AAP/EEO program;
2. Document personnel activities;
3. Identify problem areas where remedial action is needed; and
4. Determine the degree to which Western Illinois University's AAP goals and objectives have been attained.

The following personnel activities are reviewed, as necessary and desirable, to ensure nondiscrimination and EEO for all individuals without regard to their sex, race, color, sexual orientation, gender identity, gender expression, religion, age, marital status, national origin, disability, or veteran status:

1. Recruitment, advertising, and job application procedures;
2. Hiring, promotion, termination;
3. Compensation and benefits;
4. Job assignments, job classifications, job descriptions, and seniority lists;
5. Sick leave, leaves of absence, or any other leave;
6. Training, attendance at professional meetings and conferences; and
7. Any other term, condition, or privilege of employment.

The following documents are maintained as a component of Western Illinois University's internal audit process:

1. A tracking system to monitor track applicant flow and data;

2. Summary data of external job offers and hires
3. Summary data of applicant flow documented in the Equal Opportunity Form submitted by applicants; and
4. Employment applications

Western Illinois University's audit system includes periodic review of employment decisions. Managers and supervisors are asked to report any current or foreseeable EEO problem areas and are asked to outline their suggestions/recommendations for solutions. If problem areas arise, the manager or supervisor is to report problem areas immediately to the EEO Administrator. During the reporting cycle, the following occurs:

1. The EEO Administrator will discuss any problems relating to significant rejection ratios, EEO charges, etc., with the executive administration; and
2. The EEO Administrator will report the status of the university's AAP goals and objectives to executive administration. The EEO Administrator will recommend remedial actions for the effective implementation of the AAP.

## **Plan Dissemination**

### Internal

#### Physical Availability

Copies of the affirmative action plan are provided to designated University Administrators. Copies are also available in the Office of Equal Opportunity and Access, Sherman Hall Room 203 for any employee to review. Employees may also provide feedback to Equal Opportunity and Access personnel.

#### Training

Annual training regarding equal opportunity, fair labor practices, and non-discrimination policies is available for all supervisors and managers. Trainers will review the affirmative action plan during these sessions to explain the intent of the plan and address any questions or concerns they may have.

#### Search Committee Meetings

Equal Opportunity and Access personnel will discuss the affirmative action plan initiatives and identified goals with search committees during mandatory planning meetings. Through the use of Adverse Impact Monitor, Equal Opportunity and Access personnel can efficiently and consistently track affirmative action goals.

#### Search Processes

Equal Opportunity and Access personnel will review the search process and qualifications of applicants to ensure qualified individuals are treated in a nondiscriminatory manner when approving hiring, promotion, or transfer actions.

#### Collective Bargaining Agreements

Equal Opportunity and Access personnel will communicate the existence and goals of the affirmative action plan to the collective bargaining units to ensure compliance.

#### External

##### Physical availability

Copies of the affirmative action plan are available for any applicant to review, located in the Office of Equal Opportunity and Access, Sherman Hall Room 203.

## **Equal Opportunity and Access Affirmative Action Program Annual Update – October 2018**

Western Illinois University (WIU) is committed to a comprehensive Affirmative Action Program that outlines specific goals, actions, and responsibilities for addressing underrepresentation and ensuring equal opportunity and access in all employment activities, including but not limited to, recruitment, selection, compensation, training, and promotion. Further, WIU is committed to providing an educational and work environment that fosters diversity and is free from discrimination on the bases of sex, race, color, religion, age, sexual orientation, gender identity, gender expression, marital status, national origin, disability, veteran status, genetic information and any other classes protected by state or federal law. To that end, the University's Affirmative Action Program includes anti-harassment and non-discrimination policies and related complaint procedures as well as diversity initiatives designed to help recruit, hire, train, and retain a diverse workforce. The initiatives include targeted advertising, employment monitoring, affirmative action administrative internships, dissertation fellowships, dual career placements, domestic partner benefits, and civil service intern programs.

Reinforcement for our affirmative action program and diversity initiatives is affirmed in the University's Strategic Plan, *Higher Values in Higher Education* as these efforts support two goals outlined in the Plan: to attract, recruit, retain and develop an excellent faculty representative of the diverse and global society; and to develop strategies to increase the recruitment and retention of staff and administration from traditionally underrepresented groups.

This report section serves as an update to our affirmative action program and diversity initiatives.

Effective recruitment strategies are essential to attracting and hiring an excellent faculty and staff representative of the diverse society. The University continues to use a multi-pronged approach which includes advertising in print and electronic media, including niche publications and websites,

referrals, active recruitment through nomination and identification of qualified candidates, and deliberate and defined search procedures.

In FY18, the Office of Equal Opportunity and Access provided support and coordination for 415 faculty and administrative vacancies, including 70 waivers<sup>1</sup>, 10 promotions, 157 external, and 16 internal searches as well as 162 rehires.

During FY17, females comprised 36.98% and minorities comprised 26.82% of the applicants for administrative and faculty positions. Following are the minority applicant percentages by race: Blacks (10.43%), Asians (14.98%), Hispanics (3.88%), 2 or more races (1.73%), Native American (0.43%), Hawaiian/PI (0.08%). Veteran applicants comprised 2.47% of the applicant pools. Disabled applicants comprised 3.65% of the applicant pools.

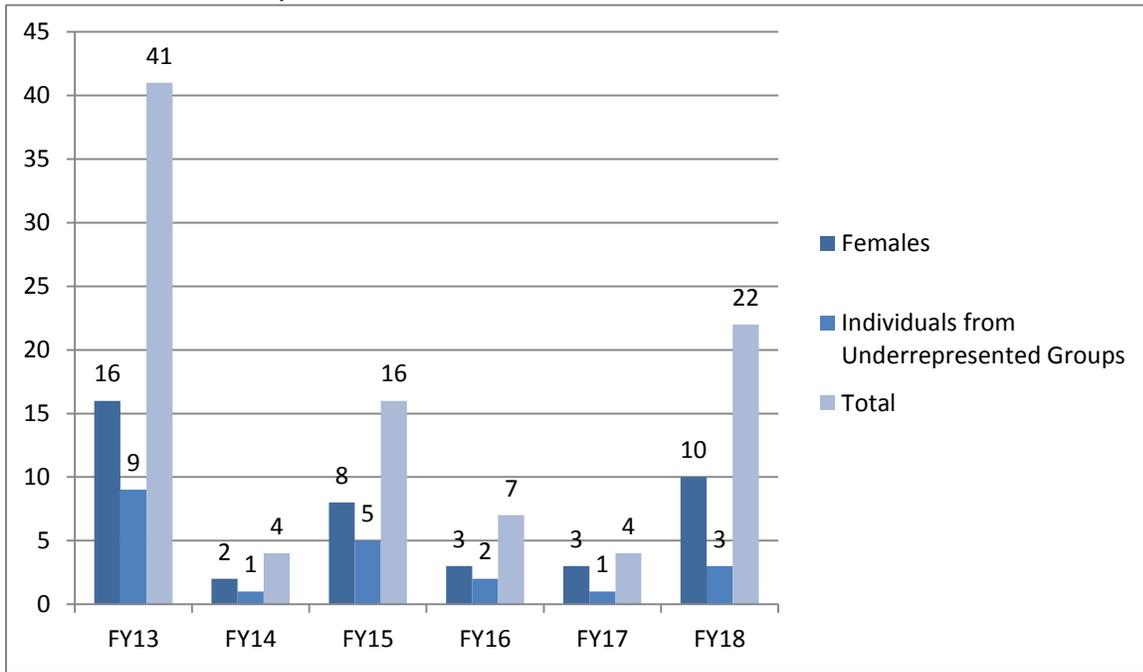
The overall percentages of female applicants increased by 3.88%, while minority applicants decreased significantly by 16.44%. Two minority applicant group increased, Asians (.3%), and Native Americans (.3%), while most groups decreased as follows: Hispanics (.05%), Blacks (3.45%), 2 or more races (1.2%), Hawaiian/PI (0.1%). Both Veterans and Individuals with Disabilities increased, (.53%), and (0.6%) respectively.

---

<sup>1</sup> The majority of waivers were processed for temporary positions of one year or less and appointments no greater than 50%, this included adjuncts and assistant coaches.

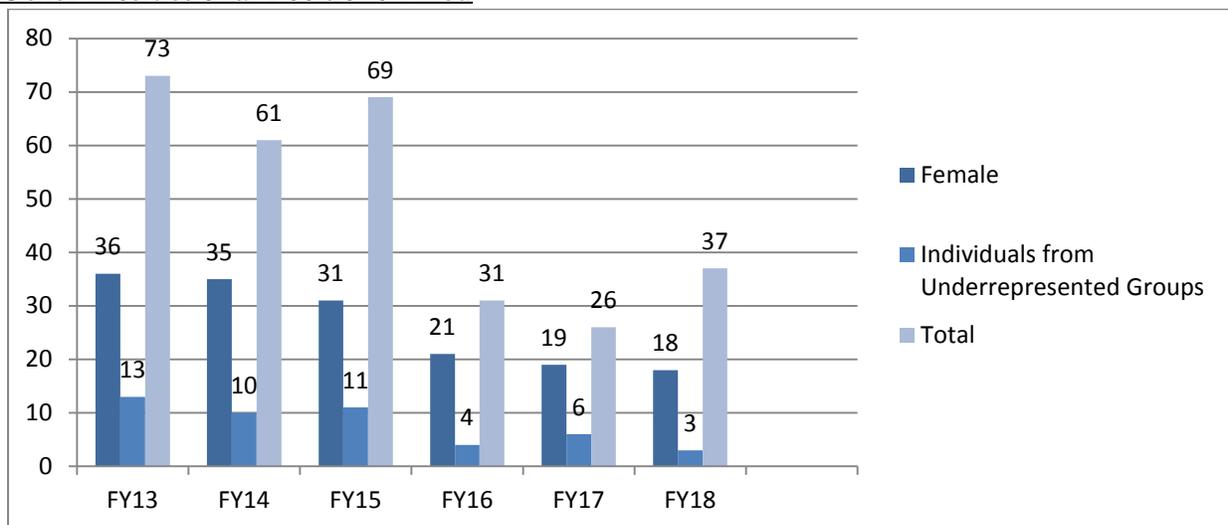
## Data - New Hires

### Tenure Track Faculty Positions Filled



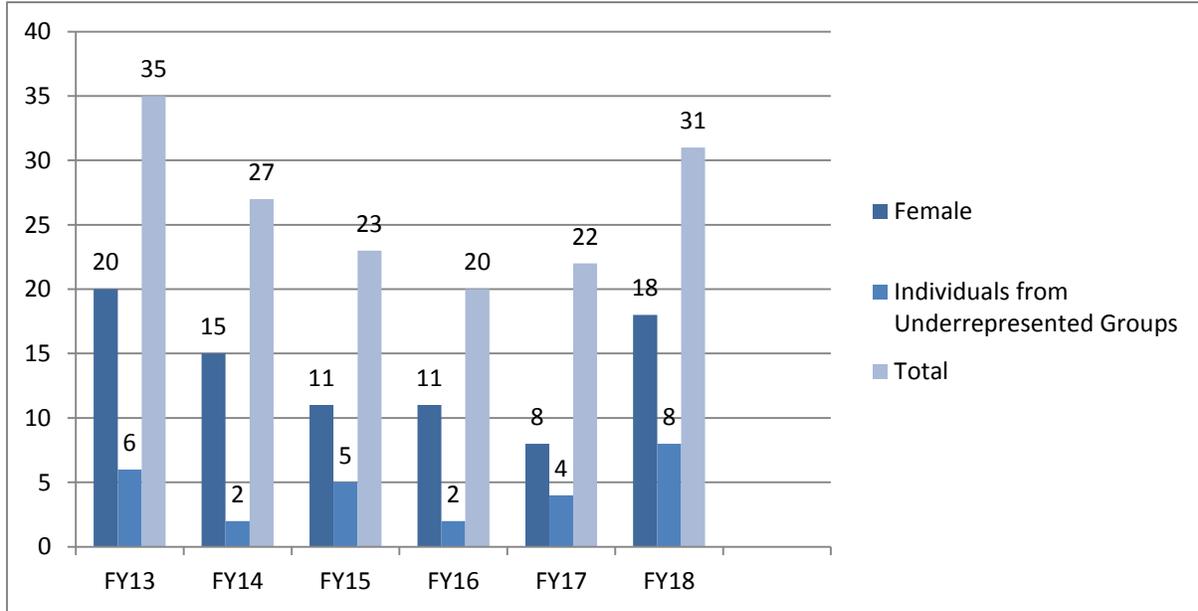
During FY18, a total of 22 new faculty were hired for tenure track positions, resulting in the hiring of 10 females (45.5%) and 8 individual from underrepresented groups (36.3%). This reflects a decrease (29.5%) in the percentage of females hired and an 11.3% increase in the percentage of individuals hired from underrepresented groups compared to FY17. The chart above shows a six-year comparison for tenure track faculty positions filled.

### Other Instructional Positions Filled



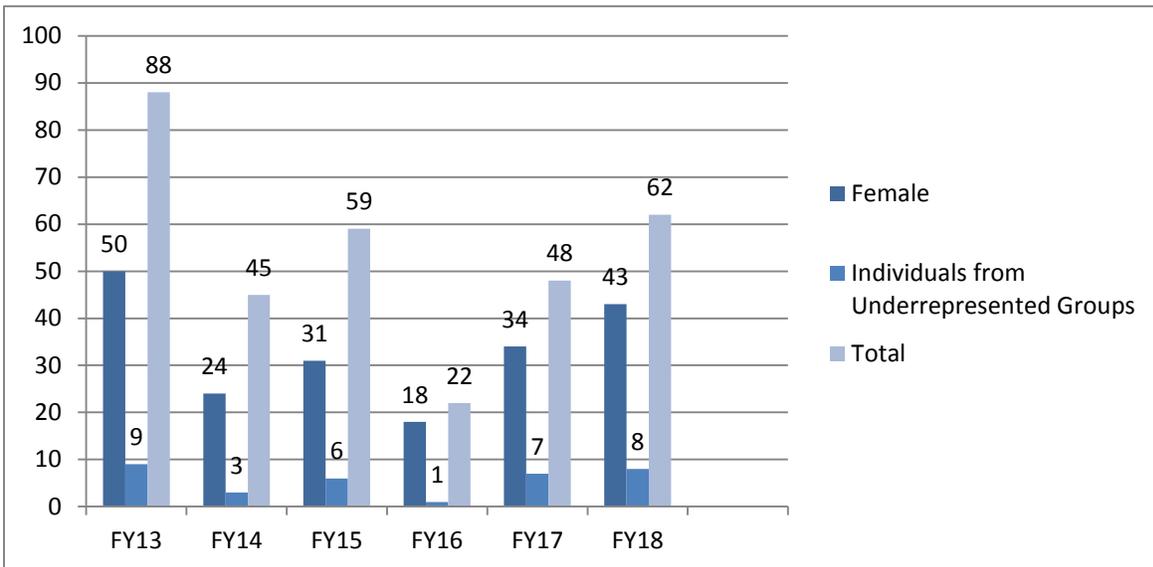
In addition to the tenure track positions, 37 other instructional positions were filled. This category includes instructors, lecturers, faculty assistants, and coaches. Of the new employees in this category, 18 (58.0%) are female and 3 (8.1%) are individuals from underrepresented groups. This represents a decrease in the percentage of females hired for other instructional positions compared to FY17 by 15%. The percentage of individuals hired from underrepresented groups decreased by 15%.

Administrative Positions Filled



During the past year, 31 individuals were hired to fill administrative vacancies, including 18 females (58.1%) and 8 individuals from underrepresented groups (25.8%). This reflects an increase in the percentage of females hired by 21.7% and an increase in the percentage of individuals from underrepresented groups by 7.6%.

Civil Service Positions Filled



Data shows that hiring activity for civil service hires during FY18 involved a total of 62 hires. Individuals hired included 43 females (69%) and 8 individual (12.9%) from underrepresented groups. This reflects a 4.1% decrease in the percentage of females and an 10.2% increase for individuals from underrepresented groups.

## **New Hire Summary**

The data for new hires shows that out of 165 new hires, 30 minorities (18.2%) and 91 females were hired. The breakdown of minorities hired was: 5 Hispanic, 12 African American, 4 Asian, 1 American Indian, and 8 Other.

## **Analyses (41 CFR 60-2.12 – 60-2.15)**

Western Illinois University utilizes the People Click Affirmative Action Plan Monitor to run a series of reports in order to conduct a workforce analysis of job groups, availability, and underutilization as required to meet compliance. These analyses help identify areas of progress as well as problem areas. The Office of Institutional Research and the Office of Administrative Information Management Systems provide the internal statistics for these analyses. External statistics are provided by the appropriate census data for the job group – state or federal, as well as the National Science Foundation’s Survey of Earned Doctorates for faculty positions.

## **Workforce Agency Report**

Due to the large size of the document, the workforce agency report is located electronically and available upon request. The Work Force Analysis for FY 18 indicated the following: the University employed a total of 1,826 employees during FY17. Of that total, 253 were minorities, representing 13.8% of the total workforce, a .1% increase.

The University employs 90 African-Americans, comprising 4.9% of the workforce; 26 Hispanic employees encompassing 1.4%; 76 Asian employees, comprising 4.2%; 8 American Indian employees for .4%; 1 Native Hawaiian Pacific Islander (NHOP); and 24 employees with two or more ethnicities, encompassing 1.4% of the workforce.

## **Job Group Analysis**

The Job Group Analysis is a review of the workforce by race, sex, and ethnicity in groups of jobs requiring similar skills, promotional opportunities and wages.

Please see Appendix I attached to this document.

## **Utilization Analysis**

The Availability Analysis is an estimate of the number of qualified minorities and women available for employment in any given job group. This analysis is the basis by which the University determines underutilization and establishes its goals. This analysis expanded the Tenure Faculty (TF) to better understand underutilization for individual academic departments.

## **EEO-6 Categories**

- 01 – Official and Managers (OM)  
(Includes WIU BOG codes: L0, L1, L2, L3, L4, L5)
- 02 – Non-Tenured Faculty  
(Includes WIU BOG codes: D1, F1, F2, F3, F4, F5)
- 03 – Administrative Staff/Technicians (AST)  
(Includes WIU BOG codes: C3, C5, P1, P2, P3, P4, P6, and P7)
- 04 – Professional Staff/Protective Service (PSPS)  
(Includes WIU BOG code: C1)
- 05 – Office & Clerical/Para-Professional (OCPP)  
(Includes WIU BOG codes: C2, C4, C6)
- 06 - Skilled Crafts (SC)  
(Includes WIU BOG code: C7)
- 07 - Service Maintenance (SM)  
(Includes WIU BOG code: C8)

Tenured Faculty (broken into individual academic departments)

- |                                      |                                     |
|--------------------------------------|-------------------------------------|
| 09 – Biological Sciences             | 30 – History                        |
| 10 – Accounting and Finance          | 31 – Kinesiology                    |
| 11 – Agriculture                     | 32 – LEJA                           |
| 12 – Art                             | 34 – Management and Marketing       |
| 14 – Chemistry                       | 35 – Mathematics                    |
| 15 – Communication                   | 36 – Music                          |
| 16 – Communication Sci. And Dis.     | 37 – Nursing                        |
| 17 – Computer Sciences               | 38 – Physics                        |
| 18 – Counselor Education             | 39 – Political Science              |
| 19 – Curriculum And Instruction      | 40 – Psychology                     |
| 20 – Diet., Fash. Merch. And Hosp.   | 41 – Recreation, Parks, and Tourism |
| 21 – Economics and Decision Sciences | 43 – Sociology and Anthropology     |
| 22 – Ed, Inter. Stud. And Ed. Lead.  | 44 – Theatre And Dance              |
| 23 – Educational Studies             | 45 – Engineering                    |
| 24 – Engineering Tech.               | 49 – Inst. Of Rural Affair          |
| 26 – Foreign Lang. And Lit.          | 50 – Philosophy And Rel. Stud.      |
| 27 – Geography                       | 51 – Liberal Arts and Sciences      |
| 28 – Geology                         | 52 – Broadcasting                   |
| 29 – Health Sci. And Soc. Work       | 53 - English                        |

Please see Appendix II attached to this document.

## Placement Goals Reports

### Accomplishment of Prior Year Placement Goals (41 CFR 60-1.40(c)) 41 CFR 60-1.12(b), -2.1(c) and -2.16

The University developed action-oriented programs (see Section V) designed to accomplish the established goals and objectives, thereby enhancing employment and advancement opportunities in the university for females and minorities. The results of the prior year's Affirmative Action Program are identified on the following report.

<u>Job Group</u>	<u>Class</u>	<u>Employees</u> <u>at</u> <u>plan date #</u>	<u>Goal</u> <u>Placement</u> <u>Rate %</u>	<u>Placements</u> <u>#</u>	<u>Actual</u> <u>Placement</u> <u>Rate %</u>	<u>Goal</u> <u>Attained ?</u>
1 Official & Managers	Minority	35	27.19	4	13.79	No
1 Official & Managers	Black	23	13.91	3	10.34	No
1 Official & Managers	Hispanic	4	7.58	0	0.00	No
1 Official & Managers	Asian	4	4.08	1	3.45	No
1 Official & Managers	AmIndian	0	0.97	0	0.00	No
10 Tenured Faculty, Accounting an	Female	7	45.62	0	0.00	No Opportunity
11 Tenured Faculty, Agriculture	Female	2	0.43	1	50.00	Yes
12 Tenured Faculty, Art	Female	6	77.99	0	0.00	No Opportunity
12 Tenured Faculty, Art	Minority	3	24.60	0	0.00	
15 Tenured Faculty, Communication	Female	2	59.70	1	100.00	Yes
15 Tenured Faculty, Communication	Minority	0	20.85	0	0.00	No
19 Tenured Faculty, Curriculum an	Female	8	74.21	3	100.00	Yes
19 Tenured Faculty, Curriculum an	Minority	2	24.62	0	0.00	No
19 Tenured Faculty, Curriculum an	Black	0	11.20	2	66.67	Yes
19 Tenured Faculty, Curriculum an	Hispanic	0	7.21	0	0.00	No

2	Non-Tenured Faculty	Minority	26	25.28	3	8.11	No
2	Non-Tenured Faculty	Black	40	6.32	0	0.00	No
2	Non-Tenured Faculty	Hispanic	2	5.44	0	0.00	No
2	Non-Tenured Faculty	Asian	10	12.11	1	2.70	No
2	Non-Tenured Faculty	AmIndian	0	0.62	0	0.00	No
22	Tenured Faculty, Educational S	Female	11	66.38	0	0.00	No
22	Tenured Faculty, Educational S	Black	0	12.83	0	0.00	No
24	Tenured Faculty, Engineering T	Female	2	23.39	0	0.00	No Opportunity
26	Tenured Faculty, Foreign Langu	Female	13	17.00	0	0.00	No Opportunity
26	Tenured Faculty, Foreign Langu	Black	1	8.46	0	0.00	No Opportunity
27	Tenured Faculty, Geography	Female	2	37.88	0	0.00	No Opportunity
3	Administrative staff/Technicia	Female	85	77.54	10	40.00	No
3	Administrative staff/Technicia	Minority	22	30.84	5	20.00	No
3	Administrative staff/Technicia	Black	8	13.83	4	16.00	Yes
3	Administrative staff/Technicia	Hispanic	3	9.49	0	0.00	No
3	Administrative staff/Technicia	Asian	3	6.76	0	0.00	No
32	Tenured Faculty, LEJA	Female	4	5.77	1	33.33	Yes
34	Tenured Faculty, Management an	Female	4	39.64	0	0.00	No Opportunity
34	Tenured Faculty, Management an	Black	0	8.09	0	0.00	No Opportunity
35	Tenured Faculty, Math	Minority	4	20.60	0	0.00	
35	Tenured Faculty, Math	Hispanic	0	3.62	0	0.00	No Opportunity
36	Tenured Faculty, Music	Female	9	41.78	0	0.00	No

36	Tenured Faculty, Music	Minority	1	17.26	0	0.00	No
36	Tenured Faculty, Music	Asian	0	7.98	0	0.00	No
36	Tenured Faculty, Music	Two+	0	3.14	0	0.00	No
4	Professional Staff/Protective	Minority	6	26.31	2	20.00	No
4	Professional Staff/Protective	Black	4	11.43	1	10.00	No
4	Professional Staff/Protective	Hispanic	0	8.66	0	0.00	No
4	Professional Staff/Protective	Asian	0	5.57	0	0.00	No
40	Tenured Faculty, Psychology	Female	13	68.80	0	0.00	No Opportunity
40	Tenured Faculty, Psychology	Minority	1	21.10	0	0.00	
40	Tenured Faculty, Psychology	Black	0	5.86	0	0.00	No Opportunity
40	Tenured Faculty, Psychology	Hispanic	0	6.78	0	0.00	No Opportunity
41	Tenured Faculty, RPTA	Female	3	4.03	1	100.00	Yes
43	Tenured Faculty, Sociology and	Hispanic	0	6.60	0	0.00	No Opportunity
44	Tenured Faculty, Theatre and D	Minority	0	14.66	0	0.00	No
5	Office & Clerical/Para- Profess	Minority	20	30.78	4	14.29	No
5	Office & Clerical/Para- Profess	Black	9	14.27	2	7.14	No
5	Office & Clerical/Para- Profess	Hispanic	3	11.41	0	0.00	No
5	Office & Clerical/Para- Profess	Asian	0	4.31	0	0.00	No
6	Skilled Craft	Female	0	7.70	0	0.00	No
6	Skilled Craft	Minority	5	24.14	0	0.00	No
6	Skilled Craft	Black	1	6.11	0	0.00	No
6	Skilled Craft	Hispanic	0	14.96	0	0.00	No
6	Skilled Craft	Asian	0	2.54	0	0.00	No

7	Service Maintenance	Female	49	67.05	5	41.67	No
7	Service Maintenance	Minority	28	49.92	2	16.67	No
7	Service Maintenance	Black	19	16.97	0	0.00	No
7	Service Maintenance	Hispanic	0	29.70	0	0.00	No
7	Service Maintenance	Asian	1	2.46	0	0.00	No
9	Tenured Faculty, Biology	Female	6	45.58	0	0.00	No Opportunity

### Current Placement Goal Report (Detailed)

#### Methodology:

Gender and minority incumbent job group percentage totals are determined by dividing the incumbent number by the total job group number. For example, if there are 11 minorities in a job group containing 134 incumbents, minorities comprise 8.2% of the job group.

The goal placement rate is calculated by dividing the incumbent group percentage total by the available labor force. The available labor force is calculated using 2010 census data. The availability of women and minorities in the recruitment pool should be reflected in job group percentages. However, differing factors can affect the practical capability of employers to reflect the available labor force. To address this reality, the OFCCP allows employers to use the 80% rule to determine workforce diversity needs. This rule means that incumbent job groups should be hired at a rate that is at least 80% of the majority hiring rate. To calculate this, the selection rate of each group is divided by the selection rate of the group with the highest selection rate. When incumbent group percentages do not satisfy the 80% rule, a goal placement rate is established.

The goal placement rate percentages have been calculated for FY 2019 on the following page:

Job Group		Placement Goals (%)							Two +
		Female	Minority	Black	Hisp	Asian	Amlnd	NHOPI	
1	Official & Managers	-	29.12	13.16	7.17	7.25	0.88	-	-
10	Tenured Faculty, Accounting an	45.62	-	8.24	-	-	-	-	-
11	Tenured Faculty, Agriculture	37.43	17.77	-	-	-	-	-	-
12	Tenured Faculty, Art	77.99	24.60	6.80	-	-	-	-	-
14	Tenured Faculty, Chemistry	-	-	-	-	-	-	-	-
15	Tenured Faculty, Communication	59.70	20.85	-	-	-	-	-	-
16	Tenured Faculty, Communication	-	-	-	-	-	-	-	-
17	Tenured Faculty, Computer Scie	18.61	-	-	-	-	-	-	-
18	Tenured Faculty, Counselor Edu	-	-	-	-	-	-	-	-
19	Tenured Faculty, Curriculum an	-	-	-	7.21	-	-	-	-
2	Non-Tenured Faculty	-	20.69	6.09	4.81	8.29	0.77	-	0.70
20	Tenured Faculty, DFMH	-	-	-	-	-	-	-	-
21	Tenured Faculty, Economics and	-	-	-	-	-	-	-	-
22	Tenured Faculty, Educational S	66.38	-	12.83	5.54	-	-	-	-
24	Tenured Faculty, Engineering T	23.39	-	-	-	-	-	-	-
26	Tenured Faculty, Foreign Langu	62.27	-	-	-	-	-	-	-
27	Tenured Faculty, Geography	37.88	-	-	-	-	-	-	-
28	Tenured Faculty, Geology	-	-	-	-	-	-	-	-
29	Tenured Faculty, Health Scienc	-	-	-	-	-	-	-	-
3	Administrative staff/Technicia	71.63	32.72	11.70	10.64	8.58	1.00	-	-
30	Tenured Faculty, History	-	-	-	-	-	-	-	-
31	Tenured Faculty, Kinesiology	-	-	-	-	-	-	-	-
32	Tenured Faculty, LEJA	51.77	-	-	-	-	-	-	-
34	Tenured Faculty, Management an	39.64	-	8.09	-	-	-	-	-
35	Tenured Faculty, Math	-	20.60	-	3.62	10.34	-	-	3.35
36	Tenured Faculty, Music	41.78	17.26	2.58	-	7.98	-	-	3.14
37	Tnured Faculty, Nursing	-	-	-	-	-	-	-	-
38	Tenured Faculty, Physics	-	-	-	-	-	-	-	-
39	Tenured Faculty, Political Sci	-	-	-	-	-	-	-	-
4	Professional Staff/Protective	-	27.04	11.89	9.12	5.36	-	-	-
40	Tenured Faculty, Psychology	68.80	21.10	5.86	6.78	-	-	-	-
41	Tenured Faculty, RPTA	-	-	-	-	-	-	-	-
43	Tenured Faculty, Sociology and	-	-	-	6.60	-	-	-	-
44	Tenured Faculty, Theatre and D	-	14.66	-	-	-	-	-	-
45	Tenured Faculty, WIU QC Engine	20.48	-	-	-	-	-	-	-
49	Tenured Faculty, IIRA	-	-	-	-	-	-	-	-
5	Office & Clerical/Para-Profess	-	31.14	14.30	11.59	4.48	-	-	-
51	Tenured Faculty, Liberal Arts	-	-	-	13.48	-	-	-	-
52	Tenured Faculty, Broadcasting	54.41	-	-	-	-	-	-	-
53	Tenured Faculty, English	77.28	19.82	-	-	-	-	-	-
6	Skilled Craft	7.36	23.90	6.05	14.82	2.48	-	-	-
7	Service Maintenance	67.37	49.77	16.98	29.56	2.45	-	-	-
9	Tenured Faculty, Biology	45.58	-	-	-	-	-	-	-

Comparison of Incumbency to Availability is performed using the 80% with Whole Person Rule

## Analysis:

Based on these calculations, there is a goal placement rate for almost every EEO job group at WIU, indicated above.

EEO – 1 Tenured Faculty - Tenured Faculty placement rates are calculated using availability data gathered from the Survey of Earned Doctorates rather than the U.S. Census. There are also different levels of tenured faculty; therefore, more context is needed to determine areas of underrepresented groups. As an institution, there is a represented need for females as well as Blacks and Hispanics in tenured faculty on the whole. The table above indicates the specific underutilization for each academic department to assist the institution in its recruitment and search efforts.

EEO – 1b Officials & Managers - There is a represented need for minorities in this job group. There is currently an incumbent job group percentage of 18.94%, which is significantly less than the 26.34%. The largest classifications in this category are Instructional Technology Systems Manager, Consultants in Research & Instruction, Admissions Counselor, Supervision Field Specialist, Academic Advisor (general), Academic Advisor in University Advising & Academic Support, and Academic Advisor in College of Education and Human Services.

EEO – 2 Non-tenure Track Faculty - There is a represented need for minorities in this job group. There is currently an incumbent job group percentage of 9.38% for minorities (a decrease of 3.95%). The national recruiting area indicates that there is 25.23% availability for minorities, establishing the goal placement rate for future hires and transfers. The largest numbers of instructors in this category work in the following departments: Mathematics, English and Journalism, Management and Marketing, Computer Sciences, and Communication.

EEO – 3 Administrative Staff/Technicians - There is a represented need for females and minorities in this job group, specifically, Blacks, Hispanics, and Asians, respectively. There is an incumbent percentage of 47.59 for females, which is lower than the 73.51% census availability for Illinois. There is currently an incumbent job group percentage of 13.9% for minorities. The recruiting area of Illinois indicates that there is 32.42% availability for minorities, establishing the goal placement rate for future hires and transfers. The largest classifications in this category are Faculty Assistants, Executive Assistants, and Applications Programmer II.

EEO – 4 Professional Staff /Protective Service - There is a represented need for minorities in this job group, specifically, Blacks, Hispanics, and Asians, respectively. There is currently an incumbent job group percentage of 5.29% for minorities. The national recruiting area indicates that there is 26.96% availability for minorities, establishing the goal placement rate for future hires and transfers. The largest classifications in this category are Admissions/Records Officer, Admissions/Record Supervisor, Administrative Assistant I, Police Officer, and Manager.

EEO – 5 Office Clerical Para-professional - There is a represented need for minorities in this job group specifically, Blacks, Hispanics, and Asians, respectively. There is currently an incumbent job group percentage of 8.9% for minorities. The recruiting area of Illinois indicates that there is 31.42% availability for minorities, establishing the goal placement rate for future hires and transfers. The largest classifications in this category are Office Support Associate, Clerk, Chief Clerk, Office Support Specialist, Library Specialist, Staff Clerk, and Office Manager.

EEO – 6 Skilled Craft - There is a represented need for females and minorities in this job group specifically, Hispanics, Blacks, and Asians, respectively. There is currently an incumbent job group percentage of 0.0% for women and 4.55% for minorities. The recruiting area of Illinois indicates that there is 7.66% availability for women and 25.83% availability for minorities, establishing the goal placement rate for future hires and transfers. The largest classifications in this category are Carpenter, Electrician, Stationary Engineer, and Utilities and Maintenance Repairman.

EEO – 7 Service Maintenance - There is a represented need for females and minorities in this job group specifically, Hispanics, Blacks, and Asians, respectively. This job group includes a percentage of 310.06% for females, which is much lower than the 66.67% availability percentage for the Illinois recruiting area. There is currently an incumbent job group percentage of 16.77% for minorities. The recruiting area of Illinois indicates that there is 49.88% availability for minorities, establishing the goal placement rate for future hires and transfers. The largest classifications in this job group are Building Service Worker and Building Service Foreman.

**Faculty Underrepresentation by Department:**

Due to the diverse student population, addressing underutilization among faculty should be an essential goal for each College’s strategic plan. The individualized view by department (see the above chart) provides the most comprehensive analysis of each department.

**Additional Findings:**

While minorities are generally underrepresented in many departments, Hispanics are severely underrepresented at WIU. There are no Hispanic employees in Skilled Craft (SC), Professional Staff/Protective Service (PSPS), or Service Maintenance positions, though they comprise 14.75%, 8.98%, and 16.84% availability in the recruiting area, respectively. There are only 3 Hispanic employees out of 236 total incumbents in the Office and Clerical/Para-professional job group. Additional recruitment efforts must be taken to recruit and hire a larger number of qualified Hispanic applicants for open positions.

**Recommendations:**

Ways in which the institution can meet these goals:

1. Larger departments within the job groups should embrace opportunities to diversify their personnel, as they will have more opportunities to do so.
2. Regarding faculty, each college should develop a college-wide strategy to encourage diversity in their faculty through the search process and promotions. Departments should also utilize the Underrepresented Minority Dissertation Fellowship and Visiting Professorship to identify qualified candidates.
3. The Civil Service search process is dictated by the State Universities Civil Service System; however, the Intern Program is a vital tool to assist departments in identifying qualified candidates from underrepresented groups.
4. Regarding administrative positions, continue to identify strategies to diversify administrative staff through recruitment and targeted promotional opportunities.

**Training**

All personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes shall be trained to ensure that the commitments in the university’s Affirmative Action Program are implemented.

In FY18, we switched to a new provider, Get Inclusive for our training. Responses from students and employees have been very positive in that the training is much more interactive and provides relevant scenarios as examples. This year, 1805 employees completed online training. 1536 students, including student employees completed the training. The breakdown for participation in the training is as follows:

<b>Training</b>	<b>FY17</b>	<b>FY18</b>
Preventing Discrimination and Sexual Violence: Title IX VAWA and Clery Act for	1738	

Faculty and Staff		
Discrimination and Harassment Prevention for Higher Education	411	
Preventing Discrimination and Sexual Violence: Title IX VAWA and Clery Act for Illinois Undergraduate/Graduate Students	4864	
Student Upstanders		1536
Title IX for Employees		1805

Participation in this training is an important step in ensuring all employees understand their rights and responsibilities as defined in the University’s Non-Discrimination and Sexual Misconduct & Gender Non-Discrimination (Title IX) Policies. Employees may access this training at any time during the year; however, every employee who has not completed the training by the first week in February receives notification that they are required to complete the training within 30 days of the notification.

In-person non-discrimination, Title IX, and diversity trainings for student and employee constituencies are also offered throughout the year. In FY18, 16 training sessions were provided.

### **Discrimination Complaints**

The University’s compliance with Affirmative Action and Equal Opportunity includes providing a means for reporting and resolving complaints of harassment or discrimination. During the past year, 14 discrimination and/or harassment complaints were filed and resolved under the University’s Discrimination Complaint Procedures. This compares to 16 complaints in FY17. Of the 14 complaints made in FY18, 4 were based on sexual harassment, 2 were based on gender, and 4 were based on disability and 4 were based on race.

Of the 14 complaints investigated, three respondents were found in violation of the University’s Anti-Harassment Policy and disciplined in accordance with regulations and relevant collective bargaining agreements.

### **Progress**

We still continue to have placement goals in many of the job groups; however we did meet the FY16 placement goal for the following: Asians in non-tenured faculty, Minorities in Skilled Craft, Minorities, African Americans, and Asians in Service Maintenance.

### **Goals**

During FY19, we will continue to pursue opportunities to expand our recruiting outreach and identify retention issues in order to improve the overall workforce diversity and address the placement goals already identified earlier in this document.

**WESTERN ILLINOIS UNIVERSITY AFFIRMATIVE ACTION PROGRAM  
FOR PROTECTED VETERANS**

## Policy Statement (41 CFR §60-300.44 (a))

Western Illinois University (University) is committed to fostering a diverse campus community through the successful recruitment and retention of veterans. The University's commitment is mirrored in the Vietnam Era Veterans Readjustment Assistance Act, which requires the University to take affirmative action to employ and advance covered veterans<sup>2</sup> in employment.

Submission of information regarding veteran status is voluntary and information obtained concerning such individuals shall be kept confidential, except that

1. supervisors and managers may be informed regarding necessary accommodations or veteran's preference points,
2. first aid and safety personnel may be informed, when and to the extent appropriate, if the condition might require emergency treatment, and
3. government officials investigating compliance with these Acts shall be informed.

Employees and applicants may provide information about

1. any special methods, skills and procedures which would qualify them for positions that they might not otherwise be able to perform, and
2. the accommodations which would enable them to perform the essential functions of a job properly and safely, including special equipment, changes in the physical layout of the job, restructuring of the job, or other accommodations.

### Responsible Administrators:

The Office of Equal Opportunity and Access is responsible for the implementation of any affirmative action programs. The Office of Equal Opportunity and Access is located in Sherman Hall, Room 203.

### Equity:

While the University strongly encourages the recruitment and retention of covered veterans, equity will be maintained by recruiting, hiring, training and promoting persons in all job titles. The University also affirms its responsibility to ensure that all personnel actions are administered without regard to protected veteran status and all employment decisions are based only on valid job requirements.

### Retaliation:

Retaliation is not tolerated at Western Illinois University. Harassment, intimidation, threats, coercion, or discrimination due to another's participation in the following activities is strictly prohibited:

- (1) Filing a complaint;

---

<sup>2</sup> The Act defines covered veterans as: disabled veterans; veterans who served on active duty in the Armed Forces during a war or in a campaign or expedition for which a campaign badge has been authorized; 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 No. 12985 (61 Fed. Reg. 1209); recently separated veterans.\

(2) Assisting or participating in an investigation, compliance evaluation, hearing, or any other activity related to the administration of the affirmative action provisions of VEVRAA or any other Federal, state or local law requiring equal opportunity for protected veterans;

(3) Opposing any act or practice made unlawful by VEVRAA or its implementing regulations in this part or any other Federal, state or local law requiring equal opportunity for protected veterans; or

(4) Exercising any other right protected by VEVRAA or its implementing regulations.

## **Review of Personnel Processes**

In determining the qualifications of veterans, Western Illinois University limits its consideration of a qualified protected veteran's military record, including discharge papers, to only that portion of the record, which is relevant to the specific job qualifications for which the veteran is being considered.

Western Illinois University collects the data for this review based on the Equal Opportunity and Access Employee Survey form, provided to all employees for voluntary completion. In addition to the survey, the Office of Equal Opportunity and Access keeps the following record through its applicant tracking system:

1. In each case where an employee or applicant who is a protected veteran is rejected for employment, promotion, or training, a reason for non-selection is provided. The statement of the reason for rejection, and the description of the accommodations considered (if any), are treated as confidential medical records in accordance with §60-300.23(d). These materials are available to the applicant or employee concerned upon request.
2. Where applicants or employees are selected for hire, promotion, or training and the University undertakes any accommodation which makes it possible for him or her to place a disabled veteran on the job, the Office of Equal Opportunity and Access maintains a record containing a description of the accommodation for administrative and professional positions. These records are treated as a confidential medical record in accordance with §60-300.23(d).

## **Physical and Mental Qualifications**

The physical and mental job qualifications of all jobs are reviewed to ensure that, to the extent that such qualification requirements tend to screen out qualified individuals with disabilities and qualified disabled veterans, job qualifications are consistent with business necessity and the safe performance of the job.

No qualification requirements have been identified which have a negative screening effect. All job qualification requirements have been found to be job-related and consistent with business necessity and safety.

Western Illinois University will continue to review physical and mental job qualification requirements whenever a job is vacated and the University intends to fill it through hiring, promotion or transfer and will conduct a qualifications review whenever job duties change.

If at any time Western Illinois University should inquire into an employee's physical or mental condition or should conduct a medical examination prior to a change in employment status, Western Illinois University affirms that information obtained as a result of the inquiry will be kept confidential, except as otherwise provided for in Section 503 of the Rehabilitation Act of 1973 regulations. The results of the examination or inquiry will be used in accordance with the aforementioned regulations:

1. Supervisors, managers, and university officials may be informed regarding restrictions and accommodations for the work or duties of individuals with a disability.
2. Employees familiar with first aid may be informed, where and to the extent appropriate, if an individual with a disability might require emergency treatment.
3. OFCCP officials investigating compliance with either the 1973 Rehabilitation Act or VEVRAA, as amended.

## **Reasonable accommodation to physical and mental limitations**

As a matter of nondiscrimination, the University will make reasonable accommodation to the known physical or mental limitations of an otherwise qualified veteran unless it can demonstrate that the accommodation would impose an undue hardship on the operation of its business. As a matter of affirmative action, if an employee who is known to be a qualified veteran is having 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 University shall confidentially notify the employee of the performance problem and inquire whether the problem is related to the employee's disability; if the employee responds affirmatively, the University shall confidentially inquire whether the employee is in need of a reasonable accommodation.

## **Harassment and Discrimination**

Employees of and applicants to Western Illinois University will not be subject to harassment, intimidation, threats, coercion, or discrimination because they have engaged or may engage in filing a complaint, assisting in a review, investigation, or hearing or have otherwise sought to obtain their legal rights related to any Federal, State, or local law regarding EEO for qualified individuals with disabilities or qualified protected veterans. Any employees or applicants who feel that they have been subject to harassment, intimidation, threats, coercion, or discrimination because of their status as a qualified protected veteran should contact the EEO Administrator for assistance. This policy is posted on Western Illinois University's website and physically available for employees and applicants to view.

## **External Dissemination of Policy, Outreach, and Positive Recruitment**

The University has taken the following steps to externally disseminate its policy:

1. Notify all hiring administrators of Western Illinois University's EEO and AA policy.
2. Inform recruiting sources, including the Illinois Employment Service, of the university's policy concerning the employment of qualified protected veterans.
3. List all suitable employment openings with the appropriate local office of the State Employment Service.
4. Participate in local job fairs sponsored by support groups for qualified protected veterans when possible.
5. Include Western Illinois University's Equal Employment Opportunity clause concerning the employment of qualified protected veterans in all nonexempt subcontracts and purchase orders.

After reviewing and determining that the Affirmative Action policies of the university provide the required Affirmative Action for the employment and the advancement of qualified protected veterans, the university has undertaken the following outreach and positive recruitment activities:

(i) Enlisting the assistance and support of the following persons and organizations in recruiting, and developing on-the-job training opportunities for veterans, in order to fulfill its commitment to provide meaningful employment opportunities for such veterans:

- (A) Western Illinois University's Veteran Resource Center (outreach to student veterans);
- (B) The veterans' counselors and coordinators ("Vet-Reps") at Western Illinois University ROTC;
- (C) Local veterans' groups and veterans' service centers, including the Quad Cities;
- (D) Western Illinois University lists all job openings with the Veterans in Higher Ed online service. Include Western Illinois University's non-discrimination clause in all position announcements;
- (E) Include Western Illinois University's Equal Employment Opportunity clause concerning the employment of qualified protected veterans in all nonexempt subcontracts and purchase orders;
- (F) Partnering with campus and community organizations to organize recruitment and job fairs to encourage veterans to consider employment in higher education.

a.) Inviting veterans to serve on event panels to discuss their experiences and assist in recruitment.

### **Assessment of external outreach and recruitment efforts**

Western Illinois University will review the outreach and recruitment efforts it has taken to evaluate the effectiveness in identifying and recruiting qualified protected veterans. If the University finds that the totality of its efforts were not effective in identifying and recruiting qualified protected veterans, it will identify and implement alternative efforts in order to fulfill its obligations.

### **Recordkeeping Obligation**

The University will document all activities it undertakes and retain these documents for a period of three (3) years.

### **Internal Dissemination of Policy**

In an effort to promote positive affirmative action for qualified protected veterans, the university has developed internal communications that foster understanding, acceptance, and support.

University employees have been notified and encouraged to take the necessary action to aid the university in meeting its affirmative action obligations. The university has informed its employees and applicants for employment of its commitment to engage in Affirmative Action to increase the employment opportunities for qualified protected veterans.

The university realizes that a strong outreach program is ineffective without the adequate internal support from the executive administration and other employees. In order to ensure greater employee cooperation and participation in

the university's affirmative action efforts, Western Illinois University has adopted and disseminated an internal policy. This policy's dissemination includes, but is not limited to the following:

1. Copies of Western Illinois University's Affirmative Action Plan (AAP) for Qualified Protected Veterans will be made available for inspection to any employee or applicant upon request to promote understanding, acceptance and support.
2. Policies are re-emphasized to managers and supervisors annually.
3. EEO poster are posted on bulletin boards located throughout the facilities and work areas.
4. All employees who believe they are a qualified protected veteran under the EEO provisions of VEVRAA, as amended, have been invited to identify themselves if they wish to benefit under this Affirmative Action Program. Such invitation is sent to employees annually.
5. All employees may be advised annually of the university's policy and encouraged to aid in Western Illinois University's Affirmative Action efforts to ensure a fair and effective program.
6. Briefing sessions may be conducted for managers and supervisors to review the applicable regulations and to discuss such Affirmative Action measures as training and reasonable accommodation.
7. When making internal equal opportunity audits, implementation of this affirmative action program will be reviewed.
8. Articles (and pictures) regarding accomplishments of employees who are qualified protected veterans may be included in university and/or facility publications whenever available.
9. The policy is communicated and/or distributed to all employees.
10. Union officials will be informed of the policy and their cooperation requested in its implementation and success.

## **Audit and Reporting Systems**

The University has designed and implemented audit and reporting systems that:

1. Measure the effectiveness of the University's programs;
2. Document personnel activities;
3. Identify problem areas where remedial action is needed; and
4. Determine the degree to which Western Illinois University's AAP goals and objectives have been attained.
5. Determine whether known protected veterans have had the opportunity to participate in all company sponsored educational, training, recreational and social activities.

6. Measure the University's compliance with the affirmative action program's specific obligations.

The following activities will be reviewed as necessary to ensure freedom from stereotyping qualified protected veterans in any manner, including that which may limit their access to any job for which they are qualified:

1. Recruitment, advertising, and job application procedures;
2. Hiring, promotion, reclassification;
3. Rates of pay and any other forms of compensation including fringe benefits;
4. Job assignments, job classifications, job descriptions, and seniority lists;
5. Sick leave, leaves of absence, or any other leave;
6. Training, attendance at professional meetings and conferences; and
7. Any other term, condition, or privilege of employment.

The following documents are maintained as a component of Western Illinois University's internal audit process:

1. A tracking system to monitor track applicant flow and data;
2. Summary data of external job offers and hires
3. Summary data of applicant flow documented in the Equal Opportunity Form submitted by applicants; and
4. Employment applications

Western Illinois University's audit system includes periodic reports documenting the University's efforts to achieve its EEO/AAP responsibilities. Managers and supervisors are asked to report any current or foreseeable EEO problem areas and are asked to outline their suggestions/recommendations for solutions. During the reporting, the following occurs:

1. The EEO Administrator will discuss any problems relating to significant rejection ratios, incumbent disparity, and EEO charges, with executive administration; and
2. The EEO Administrator will report the status of the university's AAP goals and objectives to executive administration. The EEO Administrator will recommend remedial actions for the effective implementation of the AAP.

## **Responsibility for Implementation**

### *Responsibilities of the EEO Administrator*

The EEO Administrator is responsible for the overall execution, implementation and monitoring of the Affirmative Action Program for qualified protected veterans with the support of all executive administration.

Those responsibilities shall include, but not be limited to, the following:

1. The development of the AAP for qualified protected veterans, policy statements, personnel policies and procedures, internal and external communication of the policy, and monitoring the effectiveness of these actions;
2. Reviewing all personnel actions, policies, and procedures to ensure compliance with Western Illinois University's affirmative action obligations;
3. Reviewing the qualifications of all applicants and employees to ensure that individuals are treated in a nondiscriminatory manner when hiring, promotion, transfer and termination actions occur;
4. Assisting in the identification of problem areas and the development of solutions to those problems;
5. Monitoring the effectiveness of the program on a continuing basis through the development and implementation of an internal audit- and reporting- system that measures the effectiveness of the program.
6. Keeping executive administration informed of equal opportunity progress and problems within the university through, at a minimum, periodic reports;
7. Auditing the contents of university bulletin boards annually to ensure that compliance information is posted and is up-to-date;
8. Serving as a liaison between Western Illinois University and enforcement agencies; and
9. Serving as a liaison between Western Illinois University and organizations for individuals with disabilities and protected veterans.

## Training

All personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes shall be trained to ensure that the commitments in the university's affirmative action program are implemented.

## Data Collection Analysis

Western Illinois University has collected the following data regarding protected veterans:

The number of applicants who self-identified as protected veterans pursuant to §60-300.42(a), or who are otherwise known as protected veterans:	63
The total number of job openings and total number of jobs filled (External, Internal, and Waiver)	243/165
The total number of applicants for all jobs	2550
The number of protected veteran applicants hired	6
The total number of applicants hired	165

## Benchmarks for hiring (§60-300.45)

Western Illinois University has established the following benchmark for FY 17: 5.1%

The average percentage of veterans in the civilian labor force in Illinois over the preceding four years, as calculated by the Bureau of Labor Statistics and published on the OFCCP Web site ( <a href="https://ofccp.dol-esa.gov/errd/VEVRAA.jsp">https://ofccp.dol-esa.gov/errd/VEVRAA.jsp</a> )	2011 6.3%	2012 6%	2013 5.9%	2014 5.3%	2015 5.3%	2016 5.1%	2017 4.7%
The number of veterans, over the previous four quarters, who were participants in the employment service delivery system in Illinois, as tabulated by the Veterans' Employment and Training Service and published on the OFCCP Web site ( <a href="https://ofccp.dol-esa.gov/errd/VEVRAA.jsp">https://ofccp.dol-esa.gov/errd/VEVRAA.jsp</a> )	10,072						
The applicant ratio and hiring ratio for the previous year, based on the data collected pursuant to §60-300.44(k);	Applicant Ratio: 2.5%			Hiring Ratio 2.5%			
The contractor's recent assessments of the effectiveness of its external outreach and recruitment efforts, as set forth in §60-300.44(f)(3)	Despite participation in veteran job fairs WIU has failed to attract a large pool of veteran applicants.						
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	Western Illinois University's Engineering Department (Quad Cities Campus) is less than 20 miles from the Rock Island Arsenal Army Garrison. However, Macomb, Illinois struggles to attract talent due to its remote location.						

To arrive at this benchmark, Western Illinois University considers the data in the following way:

- Factor 1 indicates that the number of veterans in Illinois' civilian labor force has been on the decrease over the last 6 years.
- Factor 2 indicates that a number of veterans are seeking employment within the state.
- Factors 3 and 4 are based on applicant and hiring ratio data for the previous year.
- Factor 5 indicates that there may be recruitment opportunities in the Quad Cities for recruitment of highly trained reservists or service personnel leaving active duty.

## Summary

Considering all the available data from Factors 1-5, Western Illinois University will rely on Factor 1 data reflecting the general availability of veterans in Illinois' civilian labor as the basis for its benchmark. Based on the data, Western Illinois University does not meet its benchmark for FY18, with 107 self-identified veterans, composing

5.9% of the workforce, a drop of 0.3% from FY17. This may be a result of the retirement of many of our veterans during FY17.

**WESTERN ILLINOIS UNIVERSITY AFFIRMATIVE ACTION PROGRAM  
FOR INDIVIDUALS WITH DISABILITIES**

## Policy Statement (41 CFR §60-741.44 (a))

Western Illinois University (University) is committed to fostering a diverse campus community through the successful recruitment and retention of individuals with disabilities. The University's commitment is mirrored in Section 503 of the Rehabilitation Act of 1973 (Section 503), which requires the University to take affirmative action to employ and advance qualified individuals with disabilities in employment.

Submission of information regarding disability status is voluntary and information obtained concerning such individuals shall be kept confidential, except that

4. supervisors and managers may be informed regarding necessary accommodations
5. first aid and safety personnel may be informed, when and to the extent appropriate, if the condition might require emergency treatment, and
6. government officials investigating compliance with these Acts shall be informed.

Employees and applicants may provide information about

3. any special methods, skills and procedures which would qualify them for positions that they might not otherwise be able to perform, and
4. the accommodations which would enable them to perform the essential functions of a job properly and safely, including special equipment, changes in the physical layout of the job, restructuring of the job, or other accommodations.

### Responsible Administrators:

The Office of Equal Opportunity and Access is responsible for the implementation of any affirmative action programs. The Office of Equal Opportunity and Access is located in Sherman Hall, Room 203.

### Equity:

While the University strongly encourages the recruitment and retention of qualified individuals with disabilities, equity will be maintained by recruiting, hiring, training and promoting persons in all job titles. The University also affirms its responsibility to ensure that all personnel actions are administered without regard to disability status and all employment decisions are based only on valid job requirements.

### Retaliation:

Retaliation is not tolerated at Western Illinois University. Harassment, intimidation, threats, coercion, or discrimination due to another's participation in the following activities is strictly prohibited:

- (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 Section 503 or any other Federal, state or local law requiring equal opportunity for qualified individuals with disabilities;
- (3) Opposing any act or practice made unlawful by Section 503 or its implementing regulations in this part or any other Federal, state or local law requiring equal opportunity for protected veterans; or
- (4) Exercising any other right protected by Section 503 or its implementing regulations.

## **Review of Personnel Processes**

Western Illinois University conducts personnel review to ensure that its personnel processes provide for careful, thorough, and systematic consideration of the job qualifications of qualified individuals with disabilities for job vacancies filled either by hiring or promotion, and for all training opportunities available. The University also employs search committee trainings to ensure that the personnel processes do not stereotype individuals with disabilities in a manner that limits their access to jobs for which they are qualified and equal access is provided at all times.

The University collects the data for this review based on the Equal Opportunity and Access Employee Survey form, provided to all employees for voluntary completion. In addition to the survey, the Office of Equal Opportunity and Access keeps the following record through its applicant tracking system:

1. The application or personnel form of each known applicant who is a qualified individual with a disability is annotated to identify each vacancy for which the applicant was considered,
2. The personnel or application records of each known qualified individual with a disability include the identification of each promotion for which the individual was considered.
3. In each case where an employee or applicant who is a qualified individual with a disability is rejected for employment, promotion, or training, a reason for non-selection is provided. The statement of the reason for rejection is documented. The description of any accommodations requested or provided, are treated as confidential medical records. These materials are available to the applicant or employee concerned upon request.
4. Where applicants or employees are selected for hire, promotion, or training and the University undertakes any accommodation which makes it possible for him or her to place a qualified individual with a disability on the job, the Office of Equal Opportunity and Access maintains a record containing a description of the accommodation for all employees. The Human Resources Office maintains records for Civil Service employees. These records are treated as a confidential medical record.

## **Physical and Mental Qualifications**

The physical and mental job qualifications of all jobs are reviewed to ensure that, to the extent that such qualification requirements tend to screen out qualified individuals with disabilities and qualified disabled veterans, job qualifications are consistent with business necessity and the safe performance of the job.

No qualification requirements have been identified which have a negative screening effect. All job qualification requirements have been found to be job-related and consistent with business necessity and safety.

Western Illinois University will continue to review physical and mental job qualification requirements whenever a job is vacated and the University intends to fill it through hiring, promotion or transfer and will conduct a qualifications review whenever job duties change.

If at any time Western Illinois University should inquire into an employee's physical or mental condition or should conduct a medical examination prior to a change in employment status, Western Illinois University affirms that information obtained as a result of the inquiry will be kept confidential, except as otherwise provided for in Section 503 of the Rehabilitation Act of 1973 regulations. The results of the examination or inquiry will be used in accordance with the aforementioned regulations:

1. Supervisors, managers, and university officials may be informed regarding restrictions and accommodations for the work or duties of individuals with a disability.
2. Employees familiar with first aid may be informed, where and to the extent appropriate, if an individual with a disability might require emergency treatment.
3. OFCCP officials investigating compliance with either Section 503 or VEVRAA, as amended.

### **Reasonable accommodation to physical and mental limitations**

As a matter of nondiscrimination, the University will make reasonable accommodation to the known physical or mental limitations of an otherwise qualified individual with a disability unless it can demonstrate that the accommodation would impose an undue hardship on the operation of its business. As a matter of affirmative action, if an employee who is known to be a qualified individual with a disability is having 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 University shall confidentially notify the employee of the performance problem and inquire whether the problem is related to the employee's disability; if the employee responds affirmatively, the University shall confidentially inquire whether the employee is in need of a reasonable accommodation.

### **Harassment and Discrimination**

Employees of and applicants to Western Illinois University will not be subject to harassment, intimidation, threats, coercion, or discrimination because they have engaged or may engage in filing a complaint, assisting in a review, investigation, or hearing or have otherwise sought to obtain their legal rights related to any Federal, State, or local law regarding EEO for qualified individuals with disabilities or qualified protected veterans. Any employees or applicants who feel that they have been subject to harassment, intimidation, threats, coercion, or discrimination because of their status as a qualified protected veteran should contact the EEO Administrator for assistance. This policy is posted on Western Illinois University's website and physically available for employees and applicants to view.

### **External Dissemination of Policy, Outreach, and Positive Recruitment**

The University has taken the following steps to externally disseminate its policy:

2. Notify all hiring administrators of Western Illinois University's EEO and AA policy regarding the employment of qualified individuals with disabilities.
2. Inform recruiting sources of the university's policy concerning the employment of qualified individuals with disabilities to encourage active recruitment and referral of qualified persons for job opportunities.
3. List all suitable employment openings with the appropriate local office of the State Employment Service and maintain regular contact with the local advocates of individuals with disabilities.
4. Participate in local job fairs sponsored by support groups for qualified individuals with disabilities when possible.
5. Include Western Illinois University's Equal Employment Opportunity clause concerning the employment of qualified individuals with disabilities in all nonexempt subcontracts and purchase orders.

After reviewing and determining that the Affirmative Action policies of the university provide the required Affirmative Action for the employment and the advancement of qualified individuals with disabilities, the university seeks to undertake the following outreach and positive recruitment activities:

(i) Enlisting the assistance and support of the following persons and organizations in recruiting, and developing on-the-job training opportunities for qualified individuals with disabilities, in order to fulfill its commitment to provide meaningful employment opportunities for such individuals:

- (A) Western Illinois University's Disability Resource Center (to reach students who are qualified individuals with disabilities);
- (C) List job openings with the online disability services. Include Western Illinois University's non-discrimination clause in all position announcements;
- (D) Include Western Illinois University's Equal Employment Opportunity clause concerning the employment of qualified individuals with disabilities in all nonexempt subcontracts and purchase orders;
- (E) Partnering with campus and community organizations to organize recruitment and job fairs to encourage qualified individuals with disabilities to consider employment in higher education.
  - a.) Inviting qualified individuals with disabilities to serve on event panels to discuss their experiences and assist in recruitment.

### **Assessment of external outreach and recruitment efforts.**

Western Illinois University will review the outreach and recruitment efforts it has taken to evaluate the effectiveness in identifying and recruiting qualified individuals with disabilities. If the University finds that the totality of its efforts were not effective in identifying and recruiting qualified individuals with disabilities, it will identify and implement alternative efforts in order to fulfill its obligations.

### **Recordkeeping Obligation**

The University will document all activities it undertakes and retain these documents for a period of three (3) years.

### **Internal Dissemination of Policy**

In an effort to promote positive affirmative action for qualified individuals with disabilities, the university has developed internal communications that foster understanding, acceptance, and support.

University employees have been notified and encouraged to take the necessary action to aid the university in meeting its affirmative action obligations. The university has informed its employees and applicants for employment of its commitment to engage in Affirmative Action to increase the employment opportunities for qualified individuals with disabilities.

The university realizes that a strong outreach program is ineffective without the adequate internal support from the executive administration and other employees. In order to ensure greater employee cooperation and participation in the university's affirmative action efforts, Western Illinois University has adopted and disseminated an internal policy. This policy's dissemination includes, but is not limited to the following:

1. Copies of Western Illinois University's Affirmative Action Plan (AAP) for Qualified Individuals with Disabilities will be made available for inspection to any employee or applicant upon request to promote understanding, acceptance and support.
2. Policies are re-emphasized to managers and supervisors annually.
3. EEO poster are posted on bulletin boards located throughout the facilities and work areas.
4. All employees who believe they are a qualified individual with a disability under the EEO provisions of Section 503, as amended, have been invited to identify themselves if they wish to benefit under this Affirmative Action Program. Such invitation is sent to employees annually.
5. All employees may be advised annually of the university's policy and encouraged to aid in Western Illinois University's Affirmative Action efforts to ensure a fair and effective program.
6. Briefing sessions may be conducted annually for managers and supervisors to review the applicable regulations and to discuss such Affirmative Action measures as training and reasonable accommodation.
7. When making internal equal opportunity audits, implementation of this affirmative action program will be reviewed.
8. Articles (and pictures) regarding accomplishments of employees who are qualified individuals with disabilities may be included in university and/or facility publications whenever available.
9. The policy is communicated and/or distributed to all employees.
10. Union officials will be informed of the policy and their cooperation requested in its implementation and success.

### **Audit and Reporting Systems**

The University has designed and implemented audit and reporting systems that:

1. Measure the effectiveness of the University's programs;
2. Document personnel activities;
3. Identify problem areas where remedial action is needed; and
4. Determine the degree to which Western Illinois University's AAP goals and objectives have been attained.
5. Determine whether known qualified individuals with a disability have had the opportunity to participate in all company sponsored educational, training, recreational and social activities.
6. Measure the University's compliance with the affirmative action program's specific obligations.

The following activities are reviewed as necessary to ensure freedom from stereotyping qualified individuals with a disability in any manner, including that which may limit their access to any job for which they are qualified:

1. Recruitment, advertising, and job application procedures;
2. Hiring, promotion, reclassification;
3. Rates of pay and any other forms of compensation including fringe benefits;
4. Job assignments, job classifications, job descriptions, and seniority lists;
5. Sick leave, leaves of absence, or any other leave;
6. Training, attendance at professional meetings and conferences; and
7. Any other term, condition, or privilege of employment.

Western Illinois University's audit system includes periodic reports documenting the University's efforts to achieve its EEO/AAP responsibilities. Managers and supervisors are asked to report any current or foreseeable EEO problem areas and are asked to outline their suggestions/recommendations for solutions. During the reporting, the following occurs:

1. The EEO Administrator will discuss any problems relating to significant rejection ratios, incumbent disparity, and EEO charges, with executive administration; and
2. The EEO Administrator will report the status of the university's AAP goals and objectives to executive administration. The EEO Administrator will recommend remedial actions for the effective implementation of the AAP.

## **Responsibility for Implementation**

### *Responsibilities of the EEO Administrator*

The EEO Administrator is responsible for the overall execution, implementation and monitoring of the Affirmative Action Program for qualified persons with a disability with the support of all executive administration.

Those responsibilities shall include, but not be limited to, the following:

1. The development of the AAP for qualified individuals with disabilities, policy statements, personnel policies and procedures, internal and external communication of the policy, and monitoring the effectiveness of these actions;
2. Reviewing all personnel actions, policies, and procedures to ensure compliance with Western Illinois University's affirmative action obligations;
3. Reviewing the qualifications of all applicants and employees to ensure that individuals are treated in a nondiscriminatory manner when hiring, promotion, transfer and termination actions occur;
4. Assisting in the identification of problem areas and the development of solutions to those problems;

5. Monitoring the effectiveness of the program on a continuing basis through the development and implementation of an internal audit- and reporting- system that measures the effectiveness of the program.
6. Keeping executive administration informed of equal opportunity progress and problems within the university through, at a minimum, periodic reports;
7. Auditing the contents of university bulletin boards annually to ensure that compliance information is posted and is up-to-date;
8. Serving as a liaison between Western Illinois University and enforcement agencies; and
9. Serving as a liaison between Western Illinois University and organizations for individuals with disabilities and protected veterans.

### Training

All personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes shall be trained to ensure that the commitments in the university’s affirmative action program are implemented.

### Data collection analysis

Western Illinois University has collected the following data regarding individuals with disabilities:

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:	93
The total number of job openings and total number of jobs filled (External, Internal, and Waiver)	243/165
The total number of applicants for all jobs	2550
The number of applicants with disabilities hired	3
The total number of applicants hired	165

### Analysis:

We have limited data on the status of applicants to Civil Service positions, which comprise half of the university’s workforce. We also had a number of applicants who chose not to answer the question or left the area blank, further skewing our numbers. To address these issues to the extent possible, we have added the forms to the Civil Service application and provided applicants with our contact information if they have any questions regarding the search process and how their information will be used.

### Utilization Goals (§60-741.45)

Western Illinois University establishes the following goal pursuant to the OFCCP: 7% of each job group. This goal will not be used as a quota or ceiling that limits or restricts the employment of individuals with disabilities.

<b>EEO-6 Categories</b>	<b>Total/IWD</b>	<b>% of Job Group</b>	<b>Goal Met?</b>
01 – Official and Managers (OM) (Includes WIU BOG codes: L0, L1, L2, L3, L4, L5)	299/10	3.3%	No
01b – Tenured Faculty	464/15	3.2%	No
02 – Non-Tenured Faculty (Includes WIU BOG codes: D1, F1, F2, F3, F4, F5)	198/2	1.0%	No
03 – Administrative Staff/Technicians (AST) (Includes WIU BOG codes: C3, C5, P1, P2, P3, P4, P6, and P7)	193/6	3.1%	No
04 – Professional Staff/Protective Service (PSPS) (Includes WIU BOG code: C1)	209/4	1.9%	No
05 – Office & Clerical/Para-Professional (OCP) (Includes WIU BOG codes: C2, C4, C6)	236/13	5.5%	No
(06 - Skilled Craft (SC) (Includes WIU BOG code: C7)	66/2	3.0%	No
07 - Service Maintenance (SM)	161/4	2.5 %	No

**Analysis:**

Fifty-six employees identified as individuals with disabilities, comprising 3.1% of the workforce. All job groups indicate an underutilization.

**Annual Evaluation**

The University will annually evaluate its utilization of individuals in each job group.

## Identification of Problem Areas

In addition, Western Illinois University performs analysis of its total employment process to determine if there are areas where individuals with disabilities may face impediments to equal opportunity. The following analyses are conducted in order to reveal any potential problem areas:

**Utilization Goals:** The University will use the Utilization Goals as a guide in its affirmative action program. If a problem is identified, the University will work with appropriate departments and personnel to correct the issue through training, recruitment, and evaluation.

For FY19, Western Illinois University will work with all job groups to identify areas of opportunity in which they can expand recruitment and retention of applicants and employees with disabilities.

For job groups that have Utilization Goals, steps will be taken to encourage and increase the percentage of qualified individuals with disabilities applying for positions both externally and internally. These steps may include, as appropriate, but are not limited to the following:

1. Publishing job advertisements in newspapers and/or magazines that target qualified individuals with disabilities;
3. Offering job training to qualified individuals with disabilities currently employed by the university in order to increase their chances of advancing within the university; particularly, the Illinois Intern Program, implemented through the State Universities Civil Service System and the Affirmative Action Internship Program;
5. Offering tuition waivers to employees to obtain educational training that will increase their chances of advancing within the university;
6. Using recruitment techniques that specifically target qualified individuals with disabilities; and
7. Continuing to use the services of the Illinois Employment Service.

**Review of Employment Decisions:** Review of employment decisions are made in order to determine whether individuals with disabilities are selected at a less favorable rate than individuals without an identified disability.

**Review of Hires/Promotions:** Whenever individuals with disabilities are selected at a lower rate than individuals without an identified disability, a review of the applicant flow is conducted to determine possible reasons why individuals with disabilities were not selected at a more favorable rate. If the university is attracting fewer than expected individuals with disabilities that fit the qualifications for the job groups, good faith efforts will be put into place to attempt to improve the applicant flow of qualified individuals with disabilities.

**Review of Terminations:** For non-voluntary terminations, if individuals with disabilities are being

terminated at a higher rate than individuals without an identified disability, a review of the employee files will be made to ensure that the university is applying its policies and procedures for termination equally for protected as well as non-protected classes.

## **The Development and Execution of Action-Oriented Programs**

Action programs have been instituted to eliminate identified problem areas and to help achieve specific Affirmative Action goals. These programs include, but are not limited to, the following:

1. The Department of Human Resources conducts annual analyses of a third of the total job descriptions at Western Illinois University to ensure they accurately reflect job functions;
2. Making position announcements available to recruiting sources and all members of the selection committee involved in the recruiting, screening, selection and promotion processes;
3. Evaluating the total selection process to ensure freedom from bias through:
  - a. Reviewing position announcements and other pre-employment forms to ensure information requested is job-related;
  - b. Evaluating selection methods that may have a disparate impact to ensure that they are job-related and consistent with business necessity; and,
  - c. Training selection committees on the search and screening process;
4. Using techniques to improve recruitment and increase the flow of qualified applicants, including applicants with disabilities. Western Illinois University has implemented the following actions:
  - a. Include the phrase “*Western Illinois University is an Affirmative Action/Equal Opportunity employer and has a strong institutional commitment to diversity. In that spirit, we are particularly interested in receiving applications from a broad spectrum of people, including minorities, women, and persons with disabilities. WIU has a non-discrimination policy that includes sex, race, color, sexual orientation, gender identity and gender expression, religion, age, marital status, national origin, disability, or veteran status.*” or a shortened tagline in all printed employment advertisements;
  - b. Place position advertisements in news media geared toward minorities and women;
  - c. Disseminate information on job opportunities to organizations representing minorities, women and employment development agencies in pertinent disciplines when job opportunities occur;
  - d. Encourage all employees to refer qualified applicants;
  - e. Actively recruit at job fairs, as well as junior colleges, colleges and universities; and
  - f. Request Illinois employment agencies to refer qualified minorities and women.
5. Ensuring that all employees are given equal opportunity for promotion. This is achieved by:
  - a. Posting promotional opportunities;
  - b. Evaluating the selection process.