

# PRAIRIE VIEW A&M UNIVERSITY

## AFFIRMATIVE ACTION PROGRAMS

**Plan Effective Date:** January 1, 2011

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**EEO Administrator:** Renee R. Williams  
Equal Opportunity Compliance Officer

**Approved by:** George Wright  
President

**Establishment's Name:** Prairie View A&M University  
01 - PRAIRIE VIEW A&M UNIVERSITY

**Establishment's Address:** P.O. Box 519; MS 1107 Alvin I. Thomas Building  
Prairie View, Texas 77446

**Prairie View A&M University**

**AFFIRMATIVE ACTION PROGRAM**

**For**

**MINORITIES AND FEMALES**

## **CONFIDENTIAL TRADE SECRET MATERIALS**

The material set forth in the AAP is deemed to constitute trade secrets, operations information, confidential statistical data, and other confidential commercial and financial data, within the meaning of the Freedom of Information Act, U.S.C. 552, Title VII of the Civil Rights Act of 1964 (as amended), 42 U.S.C. 2000e et seq., the Trade Secrets Act, 18 U.S.C. 1905, and 44 U.S.C. 3508, the disclosure of which is prohibited by law and would subject the individual making the disclosure to criminal and/or civil sanctions.

# Prairie View A&M University

## AFFIRMATIVE ACTION PROGRAM FOR MINORITIES AND FEMALES

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## **I. Equal Employment Opportunity (EEO) Policy Statement**

The EEO Policy statement on the following page is posted on our company's bulletin board as well as placed where applicants can view it.



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

### **A. Designation of Responsibilities of EEO Compliance Officer (41 CFR 60-2.17(a))**

The EEO Compliance Officer has the primary management responsibility, authority, and resources for ensuring full compliance with the provisions of Executive Order 11246, as amended, and its implementing regulations. The EEO Compliance Officer's appointment and a description of the position's basic responsibilities have been communicated to all levels of personnel in the company. The responsibilities of the EEO Compliance Officer 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 management 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 Prairie View A&M 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 Prairie View A&M University's management informed of equal opportunity progress and reporting potential problem areas within the company through reports;
6. Reviewing the company's AAP for qualified minorities and women with management to ensure that the policy is understood and is followed in all personnel activities;
7. Auditing the contents of the company's bulletin board to ensure compliance information is posted and up-to-date; and
8. Serving as liaison between Prairie View A&M University and enforcement agencies.

**B. The Responsibilities of the Company'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 company's supervisors and managers working with the EEO Compliance Officer 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.

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

Prairie View A&M 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:

- 1. 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, as defined by the methodology Prairie View A&M University uses, Placement Goals are set (see the Placement Goals report which follows this section).

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;
4. Offering job training to females and minorities currently employed by the company in order to increase their chances of advancing within the company;
6. Using recruitment companies that specifically target females and minorities; and
7. Continuing to use the services of their State Employment Service.

- 2. Review of Employment Decisions:** Review of employment decisions is made in order to determine whether or not 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 company 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 company is applying its policies and procedures for termination equally for protected as well as non-protected classes.

- 3. Compensation:** Compensation is reviewed at least annually in order to determine if there are significant discrepancies in pay when comparing female to male rates of pay and minorities versus non-minorities rates of pay. If discrepancies do exist, a thorough review is conducted to determine if the difference in pay is justified due to appropriate factors. If the difference in pay cannot be justified, Prairie View A&M University will put a plan in place to address the issue.

## Placement Goals Report

**Plan:** 01 - PRAIRIE VIEW A&M UNIVERSITY

<u>Job Group</u>	<u>Class</u>	<u>Goal Placement Rate %</u>
1-02 – ACADEMIC ADMINISTRATORS	Female	47.88%
2-08 – FACULTY - ASSOCIATE PROFESSOR	Female	40.63%
2-09 – FACULTY - ASSISTANT PROFESSOR	Female	49.84%
7-67 – COUNTY EXTENSION AGENTS	Female	87.29%

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

## **Goal Attainment Report**

**Plan: 01 - PRAIRIE VIEW A&M UNIVERSITY**

*There were no areas of underutilization in the prior year's Affirmative Action Program.  
Therefore, no placement goals were set.*

## **V. 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 may include, but are not limited to, the following:

1. Conducting annual analyses of job descriptions to ensure they accurately reflect job functions;
2. Making job descriptions available to recruiting sources and available to all members of management involved in the recruiting, screening, selection and promotion processes;
3. Evaluating the total selection process to ensure freedom from bias through:
  - a. Reviewing job applications 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;
  - c. Training personnel and management staff on proper interview techniques; and
  - d. Training in EEO for management and supervisory staff.
4. Using techniques to improve recruitment and increase the flow of qualified applicants, including minority and female applicants. Prairie View A&M University may undertake the following actions:
  - a. Include the phrase "Equal Opportunity/Affirmative Action Employer" or other acceptable tagline in all printed employment advertisements;
  - b. Place help wanted advertisements in local minority news media and women's interest media;
  - c. Disseminate information on job opportunities to organizations representing minorities, women and employment development agencies when job opportunities occur;
  - d. Encourage all employees to refer qualified applicants;
  - e. Actively recruit at secondary schools, junior colleges, colleges and universities with predominantly minority or female enrollments; and
  - f. Request employment agencies to refer qualified minorities and women.

5. Preparing a self-audit of the company's compensation practices;
6. Ensuring that all employees are given equal opportunity for promotion. This is achieved by:
  - a. Posting promotional opportunities;

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

The company 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 total program can be monitored for effectiveness, and management can be kept informed. Prairie View A&M 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 Prairie View A&M 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 race, color, gender, religion, national origin:

1. Recruitment, advertising, and job application procedures;
2. Hiring, promotion, upgrading, layoff, recall from layoff;
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 may be maintained as a component of Prairie View A&M University's internal audit process:

1. An applicant flow log;
2. Summary data of external job offers and hires, promotions, resignations, terminations;
3. Summary data of applicant flow;

4. Employment applications; and
5. Records pertaining to Prairie View A&M University's compensation system.

Prairie View A&M 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 Coordinator. During the reporting cycle, the following occurs:

1. The EEO Compliance Officer will discuss any problems relating to significant rejection ratios, EEO charges, etc., with management; and
2. The EEO Compliance Officer will report the status of the company's AAP goals and objectives to management. The EEO Coordinator will recommend remedial actions for the effective implementation of the AAP.

**Prairie View A&M University**

**AFFIRMATIVE ACTION PROGRAM**

**For**

**QUALIFIED INDIVIDUALS WITH DISABILITIES  
AND QUALIFIED PROTECTED VETERANS**

# Prairie View A&M University

## AFFIRMATIVE ACTION PROGRAM FOR QUALIFIED INDIVIDUALS WITH DISABILITIES AND QUALIFIED PROTECTED VETERANS

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## **I. Policy Statement**

Under the Affirmative Action obligations imposed by Section 503 of the Rehabilitation Act of 1973 and Vietnam Era Veterans' Readjustment Assistance Act of 1974 (VEVRAA), as amended, it is the policy of the company to provide Equal Employment Opportunities and to advance in employment qualified individuals with a disability as well as qualified protected veterans. This policy is designed to employ and advance all qualified individuals with a disability and qualified protected veterans at all levels of employment, including the executive level. The company's policy of providing Equal Employment Opportunities to qualified persons with a disability and qualified protected veterans shall apply to all employment practices including, but not limited to: upgrading, demotion or transfer, layoff or termination, rates of pay or other forms of compensation, and selection for training. The company attempts to comply with all of the rules, regulations, and relevant orders of the Secretary of Labor and the Office of Federal Contract Compliance Programs (OFCCP), issued pursuant to Section 503 of the 1973 Rehabilitation Act and the 1974 Vietnam Era Veterans' Readjustment Assistance Act, as amended.

The company's Affirmative Action Program for qualified persons with a disability and qualified protected veterans is reviewed and updated annually. If there are any significant changes in the company's procedure, or if employee rights or benefits are modified as a result of an annual updating, these changes are communicated to employees and to applicants for employment.

On a strictly voluntary basis, the company invites all qualified protected veterans who are either employees or applicants for employment, and employees who have a disability, and who wish to benefit under the company's Affirmative Action Program to identify themselves to either their immediate supervisor or to the EEO Compliance Officer. Any individual who identifies himself/herself will not be subjected to any form of harassment or retaliation based on his/her status or self-identification. Further, this self-identification will be kept confidential.

Employees and applicants shall not be subjected to harassment, intimidation, threats, coercion or discrimination because they have engaged in or may engage in any of the following activities: (1) filing a complaint; (2) assisting or participating in an investigation, compliance review, hearing, or any other activity related to the administration of Section 503 of the Rehabilitation Act of 1973, as amended, VEVRAA, as amended, or any other Federal, State or local law requiring equal opportunity for disabled persons or qualified protected veterans or; (3) opposing any act or practice made unlawful by Section 503 of the Rehabilitation Act of 1973, VEVRAA or its implementing regulations in this part or any other Federal, State or local law requiring equal opportunity for disabled persons or for qualified protected veterans; or (4) exercising any other right protected by Section 503 of the Rehabilitation Act of 1973, or its implementing regulations in this part or any other right protected by VEVRAA or its implementing regulations in this part.

## **II. Review of Personnel Processes**

Prairie View A&M University reviews annually its personnel processes to determine whether its present procedures ensure careful, thorough and systematic consideration of the qualifications of known qualified individuals with disabilities and qualified protected veterans. This review covers all procedures related to the filling of job vacancies either by hire or by promotion, as well as all training opportunities offered or made available to employees.

In determining the qualifications of veterans, Prairie View A&M 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.

Based upon Prairie View A&M University's review of its personnel processes, Prairie View A&M University will modify the personnel processes when necessary, and will include the development of new procedures in this Affirmative Action Program to ensure Equal Employment Opportunity.

### **III. Physical and Mental Qualifications**

The physical and mental job qualifications of all jobs have been reviewed and are reviewed as new ones are established 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 were identified which had a screening effect. All job qualification requirements were found to be job-related and consistent with business necessity and safety.

Prairie View A&M University will continue to review physical and mental job qualification requirements whenever a job is vacated and the company intends to fill it through hiring, promotion or transfer and will conduct a qualifications review whenever job duties change.

If at any time Prairie View A&M University should inquire into an employee's physical or mental condition or should conduct a medical examination prior to a change in employment status, Prairie View A&M 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 company 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.

#### **IV. Reasonable Accommodation to Physical and Mental Limitations**

It is the company's policy to make a reasonable accommodation to the physical and mental limitations of any employee with a disability and qualified applicants with a disability unless his/her accommodation imposes an undue hardship on the company's business (41 C.F.R. – 741.44(d); 250-44(d)). In determining the extent of the company's accommodation obligations, the following factors, among others, are considered:

1. Business necessity; and
2. Financial cost and expense.

Each applicant or employee is dealt with on an individual basis. Reasonable accommodations are made whenever possible and ongoing efforts include revision of facilities to make them accessible. The company makes every effort to provide suitable employment for those employees who become disabled while employed by us.

## **V. Harassment Prevention Procedures**

Employees of and applicants to Prairie View A&M 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 disability or status as a qualified protected veteran should contact the EEO Compliance Officer for assistance. This policy is posted for employees and applicants to view.

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

After reviewing and determining that the Affirmative Action policies of the company provide the required Affirmative Action for the employment and the advancement of qualified individuals with a disability and qualified protected veterans, the company may undertake the following outreach and positive recruitment activities:

1. Notify all subcontractors, vendors and suppliers of Prairie View A&M University's EEO and AA policy regarding the employment of qualified individuals with disabilities and qualified protected veterans.
2. Inform all recruiting sources, including the State Employment Service, employment agencies, educational institutions and social service agencies of the company's policy concerning the employment of qualified individuals with disabilities and qualified protected veterans and have been advised to actively recruit and refer 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 Veterans Employment Representative.
4. Consider holding formal briefing sessions to invite representatives from recruitment sources and placement agencies to tour the facility, discuss current and prospective position openings, job descriptions and required qualifications and explanations of the company's selection procedures.
5. Consider participating in local job fairs sponsored by support groups for qualified individuals with disabilities and qualified protected veterans.
6. Include the Equal Employment Opportunity clause concerning the employment of qualified individuals with disabilities and qualified protected veterans in all nonexempt subcontracts and purchase orders.

## **VII. Internal Dissemination of Policy**

In an effort to promote positive Affirmative Action for qualified individuals with a disability and qualified protected veterans, the company has developed internal communications that foster understanding, acceptance, and support among the company's executive, management, and supervisory personnel. Additionally, all other company employees have been notified and encouraged to take the necessary action to aid the company in meeting its Affirmative Action obligations. The company 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 a disability and qualified protected veterans.

The company realizes that a strong outreach program is ineffective without the adequate internal support from management personnel and other employees. In order to ensure greater employee cooperation and participation in the company's Affirmative Action efforts, Prairie View A&M University has adopted and disseminated an internal policy. This policy's dissemination may include but is not limited to the following:

1. Copies of our AAP for Individuals with Disabilities and 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. Prairie View A&M University's Affirmative Action policy and the EEO poster are posted on bulletin boards located throughout our facilities and work areas.
4. All employees who believe they are a qualified individual with a disability, as defined in Section 503 of the Rehabilitation Act of 1973, as amended, or who 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 has been posted on bulletin boards throughout the facility and work areas.

5. All employees may be advised annually of the company's policy and encouraged to aid in Prairie View A&M 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 and qualified protected veterans may be included in company and/or facility publications whenever available.
9. The policy is communicated and/or distributed to all employees.

## **VIII. Audit and Reporting Systems**

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

1. Measure the effectiveness of the company's programs;
2. Document personnel activities;
3. Identify problem areas where remedial action is needed; and
4. Determine the degree to which Prairie View A&M University's AAP goals and objectives have been attained.

The following activities are reviewed at least annually to ensure freedom from stereotyping qualified individuals with disabilities and 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, upgrading, layoff, recall from layoff;
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.

Prairie View A&M University's audit system includes periodic reports documenting Prairie View A&M 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 Compliance Officer will discuss any problems relating to significant rejection ratios, EEO charges, etc., with management; and
2. The EEO Compliance Officer will report the status of the company's AAP goals and objectives to management. The EEO Compliance Officer will recommend remedial actions for the effective implementation of the AAP.

## **IX. Responsibility for Implementation**

**A. Responsibilities of EEO Compliance Officer:** The EEO Coordinator is responsible for the overall execution, implementation and monitoring of the Affirmative Action Program for qualified persons with a disability and qualified protected veterans with the support of all management.

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

1. The development of the AAP for individuals with disabilities and 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 Prairie View A&M University's Affirmative Action obligations;
3. 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;
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 management informed of equal opportunity progress and problems within the company through, at a minimum, periodic reports;
7. Providing department managers with a copy of the AAP for Qualified Individuals with Disabilities and Qualified Protected Veterans and reviewing the program with them on an annual basis to ensure knowledge of their responsibilities for implementation of the program;
8. Reviewing the company's AAP for qualified individuals with disabilities and qualified protected veterans with all managers and supervisors at all levels to ensure that the policy is understood and is followed in all personnel activities;

9. Auditing the contents of company bulletin boards annually to ensure that compliance information is posted and is up-to-date;
10. Serving as a liaison between Prairie View A&M University and enforcement agencies; and
11. Serving as a liaison between Prairie View A&M University and organizations for individuals with disabilities and protected veterans.

**B. Responsibilities of Managers and Supervisors:** Managers and supervisors are advised annually of their responsibilities under the company's AAP for qualified individuals with disabilities and qualified protected veterans and of their obligations to:

1. Review the company's Affirmative Action policy for qualified individuals with disabilities and qualified protected veterans with subordinate managers and supervisors to ensure that they are aware of the policy and understand their obligation to comply with it in all personnel actions;
2. Assist in the identification of problem areas, formulate solutions, and establish departmental goals and objectives when necessary;
3. Review the qualifications of all applicants and employees to ensure qualified individuals are treated in a nondiscriminatory manner when hire, promotion, transfer, and termination actions occur; and
4. Review all employees' performance to ensure that non-discrimination is adhered to in all personnel activities.

## **X. Training**

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