

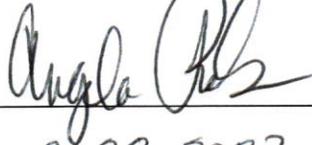
## AFFIRMATIVE ACTION PROGRAMS

**Plan Effective Date:** January 1, 2022

**Plan Expiration Date:** December 31, 2022

**Prepared By:** Angela Revels  
Assistant VC Human Resources/EEO Officer

Signature:



Date:

2-22-2022

**Approved by:** Robin Gary Cummings  
Chancellor

Signature:



Date:

2-22-2022

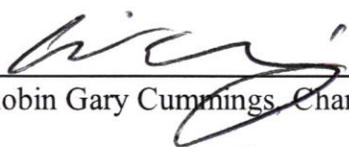
**Establishment's Name:** The University of North Carolina at Pembroke

56-6000085

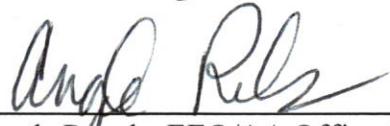
**Establishment's Address:** One University Drive, Pembroke, NC 28372-1510

## Equal Employment Opportunity/Affirmative Action Plan Certification Statement

This certifies that the attached Equal Employment Opportunity/Affirmative Action Plan represents the **University of North Carolina at Pembroke's** commitment to providing equal employment opportunities to applicants and employees. I attest that the **University of North Carolina at Pembroke** follows the [North Carolina Equal Employment Opportunity Policy](#) along with all applicable federal and state laws, including current executive orders governing equal employment opportunities.

  
\_\_\_\_\_  
Robin Gary Cummings, Chancellor

2-22-2022  
\_\_\_\_\_  
Date

  
\_\_\_\_\_  
Angela Revels, EEO/AA Officer Signature

2-22-2022  
\_\_\_\_\_  
Date

UNIVERSITY *of* NORTH CAROLINA  
PEMBROKE

**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.

UNIVERSITY of NORTH CAROLINA  
**P E M B R O K E**

**AFFIRMATIVE ACTION PROGRAM FOR  
MINORITIES AND FEMALES**

**The University of North Carolina at Pembroke**

**AFFIRMATIVE ACTION PROGRAM FOR MINORITIES AND FEMALES**

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## **BRIEF OVERVIEW OF UNC PEMBROKE**

The University of North Carolina at Pembroke distinguishes itself from peer institutions by offering an affordable, highly personalized, student-centered education to diverse students. Founded in 1887 as an American Indian institution to serve the Lumbee people, UNC Pembroke is now also comprised of students, faculty and staff who possess differing attributes based on race, ethnicity, gender, sexual orientation, disability status, national origin, age, political affiliation, religion, and other characteristics. Diversity grounds intellectual pursuits and provides us with opportunities for discovery and ways to integrate all individuals and groups into the larger community, respecting and valuing their uniqueness while simultaneously advancing the University's historical tradition. UNC Pembroke thus prepares its students for life and leadership within a diverse society.

UNC Pembroke believes that we exist to change the lives of our students, faculty, staff and the communities we serve.

Messaging throughout our campus instills the university's core values:

- Communication
- Collaboration
- Integrity
- Accountability
- Innovation
- Service

UNC Pembroke is focused on and committed to **CHANGING LIVES THROUGH EDUCATION.**

UNIVERSITY of NORTH CAROLINA  
PEMBROKE

- **EEO Policy Statement**

**The University of North Carolina at Pembroke**, through its responsible managers, recruits, hires, reclassifies, trains, and promotes in all job titles without regard to race, religion, color, national origin, ethnicity, sex, pregnancy, gender identity or expression, sexual orientation, age (40 or older), political affiliation, National Guard or veteran status, genetic information, or disability.

The overall intent of this policy is to ensure the administration and implementation of all personnel policies, practices and programs in a non-discriminatory manner that is fair and equitable. UNC Pembroke follows all Federal and State Equal Employment Opportunity Laws. Furthermore, UNC Pembroke's programs include monitoring and evaluation of all EEO programs.

Managers shall ensure that all personnel actions such as compensation, benefits, terminations, university-sponsored training, and social and recreational programs shall be administered in a non-discriminatory manner without regard to race, religion, color, national origin, ethnicity, sex, pregnancy, gender identity or expression, sexual orientation, age (40 or older), political affiliation, National Guard or veteran status, genetic information, or disability.

Managers shall base employment decisions on the principles of equal employment opportunity and with the intent to further The University of North Carolina at Pembroke's commitment to affirmative action and equal employment by promoting a diverse workforce. At no time will any covered employee, or covered applicant for employment, who exercises his/her rights pursuant to The University of North Carolina at Pembroke's Affirmative Action Policy be subject to discipline or have his/her opportunities for employment adversely affected.

Managers shall take affirmative action to ensure that qualified minority group individuals, females, disabled, or protected veterans are introduced into the workforce, are encouraged to aspire for promotion, and are considered as promotional opportunities arise.

**The University of North Carolina at Pembroke** invites any employee or any applicant for employment to review The University of North Carolina at Pembroke's written Affirmative Action Programs. These programs are available on the Office of Human Resources website: [2022 EEO Policy Plan and Policy Plan Statement](#) and for inspection upon request between normal business hours Monday through Friday at the Office of Human Resources. Any questions should be directed to your supervisor, or the EEO Officer, Angela Revels, Assistant Vice Chancellor of Human Resources, or her Designee, or me.

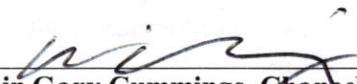
Applicants are encouraged to identify their race and sex. This self-identification is strictly voluntary and confidential and will not result in retaliation of any sort.

Employees are invited to self-identify as an individual with a disability or protected veteran status. This self-identification is strictly voluntary, confidential and will not result in retaliation of any sort.

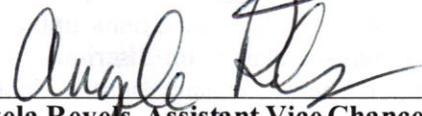
Employees and applicants shall not be subjected to harassment, intimidation, threats, coercion or discrimination because they have engaged in or may engage in any of the following activities: (1) filing a complaint; (2) assisting or participating in an investigation, compliance review, hearing, or any other

activity related to the administration of Section 503 of the Rehabilitation Act of 1973, as amended, the Vietnam Era Veterans' Readjustment Assistance Act of 1974 (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, VEVRAA or its implementing regulations in this part or any other federal, state or local law requiring equal opportunity for qualified individuals with disabilities and qualified protected veterans; or (4) exercising any other right protected by Section 503 or its implementing regulations in this part or any other right protected by VEVRAA or its implementing regulations in this part.

The university has established an equal employment opportunity (EEO) committee made up of a diverse representation of employees from across campus responsible for reviewing the ongoing operation of the affirmative action program to assure employees are treated fairly in opportunities for employment, career development and compensation.

  
\_\_\_\_\_  
**Robin Gary Cummings, Chancellor**

Date: \_\_\_\_\_

  
\_\_\_\_\_  
**Angela Reves, Assistant Vice Chancellor Human Resources**

Date: 2-22-2022

### **University Achievements:**

The University of North Carolina at Pembroke maintains diversity as a top organizational goal. To support this mandate, the University has appointed a diverse management team comprised of 50% male employees and 50% female employees. **Academic Affairs:** An American Indian female was hired as the Director of Academic Resources on August 16, 2021. An American Indian male was hired as the Director of Financial Aid on November 1, 2021. A Black female was promoted to Director of Military and Academic Outreach on November 1, 2021. An American Indian female was promoted to Associate Director of Financial Aid on September 1, 2021. **Advancement:** An American Indian female was hired as the Director of Alumni and Annual Giving on May 17, 2021. **Chancellor's Office:** An Asian female was promoted to Assistant General Counsel on February 1, 2021. **Finance and Administration:** A black male was hired as the Director of Financial Reporting on April 19, 2021. An American Indian female was promoted to Director of Budget and Financial Planning on March 1, 2021. An American Indian female was promoted to Associate Budget Director on June 18, 2021. **Student Affairs:** A black male was promoted to Staff Counselor/Psychologist in on April 12, 2021. A black female was hired as the CARE Case Manager on August 16, 2021. An American Indian female was promoted to Case Manager on September 27, 2021.

### **Veterans and Individuals with Disabilities:**

On February 1, 2021, a white male designated as veteran was hired in the Chancellor's Office as the Executive Director of External Affairs. On October 18, 2021, a white female designated as an individual with disability was hired in the Enrollment Management area. On November 1<sup>st</sup>, an American Indian male designated as an individual with disability was hired in the Enrollment Management area. On September 7<sup>th</sup>, a white female designated as a veteran, was hired as the Post Awards Coordinator in the Office of Sponsored Research. In total in 2021, four veterans were hired or promoted and four individuals with disabilities were hired or promoted. Several employees self-reported during the year as individuals with disabilities.

The **UNCP's Diversity and Inclusion Committee** is comprised of 18 student, faculty, and staff members from across campus. The Council was tasked with drafting the university's inclusion & diversity policy, reviewing current inclusion and diversity initiatives, benchmarking peer institutions and developing key metrics, promote best practices, and provide guidance/assistance to applicable organizations with inclusion and diversity responsibilities.

Initiatives in 2021 were as follows:

#### Created Employee Resource Groups:

American Indian  
LGBTQI+

African America/Black

In the process of creating the following Employee Resource Groups:

Women

Hispanic

Asian American

Began working on a draft of a campus guide to inclusive excellence to be used by any department or group that would like to increase inclusion in their classes, programming, or events. It is a best practice guide for inclusive excellence.

Began working on securing a campus climate survey ideally to be implemented in spring 2022 but maybe moved to fall 2022.

The *INSIGHT Into Diversity Higher Education Excellence in Diversity (HEED)* Award recognizes colleges and universities that demonstrate an outstanding commitment to diversity and inclusion. The university completed an application but did not receive the award due to having a low score. However, the university is using the questions from the assessment to highlight those areas in which gaps were identified to improve our score next year.

The UNC System Office's strategic plan includes an action item for a five-year project to conduct an employee engagement survey every two years to measure workplace engagement. The outcomes of the survey will help the university identify areas of strength and areas that may need improvement. In the diversity and inclusion portion of the engagement survey, one belief statement: *"My institution is committed to building a culture that actively promotes diversity and inclusion for students, faculty, and staff. (Diversity and inclusion means the intentional efforts undertaken to create an institutional culture and a working and learning environment that offers acceptance, support, and respect for diversity of individuals.)"*, UNCP's overall positive response rate of 76% tied for second highest among all UNC campuses. In 2020, another belief statement included in the survey: *"my institution's culture is special-something you just don't find anywhere"*, UNCP ranked highest in the system at 79% positive response rate. Finally, UNCP's overall dimension of 'pride', meaning employees feel proud of the university and its heritage leading to a sense of purpose in our truly unique institution, was the highest ranked dimension overall, and reflects what kind of university we are and our commitment to our students. The University will systematically focus on recruitment, retention, and development of the most talented and diverse workforce possible at all levels over the next five years.

The university has worked to ensure that all terms and conditions of employment are fair and accessible and that employment decisions are made without regard to race, religion, color, national origin, ethnicity, sex, pregnancy, gender identity or expression, sexual orientation, age (40 or older), political affiliation, National Guard or veteran status, genetic information, or disability. UNC Pembroke is proud of the overall diversity of its workforce which includes 4.70% of veterans and 4.24% of individuals with disabilities.

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

### **A. Designation of Responsibilities of University of North Carolina at Pembroke:**

1. Adhere to the policies and programs that have been adopted by the State Human Resources Commission and approved by the Governor.
2. Designate a management-level official responsible to oversee the EEO Program.
3. Ensure each manager and supervisor has, as a part of his or her performance plan, the responsibility to comply with EEO Laws and Policies, and assist in achieving EEO goals established by the university.
4. Communicate the University's commitment to EEO to all employees, applicants and to the public.
5. Provide necessary resources to ensure the successful implementation of the EEO Program.
6. Ensure the development and implementation of HR policies, procedures, and programs necessary to achieve a diverse workforce in each occupational category; and
7. Take measures to ensure the work environment is consistent with the intent of this policy and supports equal opportunity.

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

**B. Chancellor's responsibility:**

1. Implementation of this policy and any related policies or programs;
2. Designate an official at the Assistant Vice Chancellor level with direct reporting relationship to the Chancellor to assume responsibility for the operation and implementation of their equal opportunity plan and program;
3. Execute positive measures to ensure that equal opportunity is available in all areas of employment;
4. Execute measures to ensure the work environment is consistent with the intent of this policy and supports equal opportunity;
5. Communicate the university's commitment to EEO policies, plans, and procedures to all employees, applicants and the general public;
6. Provide necessary resources to ensure the successful implementation of the EEO program;
7. Ensure the development and implementation of policies, procedures, and programs necessary to achieve a workforce in each occupational category that reflects the State of North Carolina working population;
8. Ensure the development and implementation of an equal employment opportunity plan and program;

9. Submit the EEO plan and program by March 1 of each year to the Office of State Human Resources for review, technical assistance and approval by the Director of State Human Resources.

**C. 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 other management (Deans, Department Chairs, Directors and other Hiring Officials) working with the EEO Officer or her Designee (EEO Coordinator), include, but are not necessarily limited to, the following:

1. Assist in the development and implementation of the EEO Plan and Program and establish program objectives.
2. Maintain a diverse workforce for the department, division, work unit or section.
3. Assist the EEO Officer in periodic evaluations to determine the effectiveness of the EEO Program; and
4. Provide a work environment and management practices which support equal opportunity in all terms and conditions of employment.

**D. EEO Committee responsibilities:**

1. Serve as a communication link between managers and employees and the EEO staff on aspects of the EEO plan and program;
2. Review and evaluate the equal employment opportunity plan and program;
3. Review workforce representation data in each occupational category;
4. Survey the organizational climate, employee attitudes and evaluating the resultant data;
5. Meet with the Chancellor or his Designee in conjunction with the EEO Officer and /or EEO Officer to discuss EEO programs, report on the employees’ concerns, and recommend changes or additions to the EEO policy, plan, or program;
6. Identify recruitment resources and other activities designed to strengthen the EEO program;
7. Best practice is that the EEO Committee meet quarterly, but it is important that the group remain engaged and active if meetings are less frequent;
8. Once appointed, all members should attend EEO and Diversity Fundamentals (EEODF) training, if they have not already.

The UNC Pembroke EEO Committee is as follows:

Member	Title	Term
Lawrence Locklear (NM) EHRA NF	Director of Student Inclusion and Diversity	2 years

Vanessa Scott (NF) SHRA	Administrative Support Associate	1 year
Marquitta Harrington (BF) SHRA	Technology Support Technician	3 years
Astrid Oviedo (API) Faculty	Associate Professor-Nursing	3 years
Gretchen Robinson (BF) Faculty	Associate Professor – Teacher Education and Educational Leadership and Specialties	1 year
Ashley Allen (WF) EHRA NF	Associate Dean, College of Arts Sciences	3 years
Angela Revels (NF) EHRA NF	Assistant VC of Human Resources	Ongoing
Joanne McMillan (WF) SHRA	HR Consultant for Employment	Ongoing

**E. EEO Officer Responsibilities:**

1. Interpret and apply Federal laws, state statutes, and policies related to equal employment opportunity.
2. Ensure the EEO Plan is submitted by March 1 annually in accordance with the EEO Instruction and Format Guide as specified by the Office of State Human Resources.
3. Ensure hiring recommendations are reviewed for compliance with EEO Program objectives prior the final University hiring decision.
4. Ensure all employees are made aware of the EEO Policy including the Annual EEO Plan, EEO Policy, Reasonable Accommodation Policy and Unlawful Workplace Harassment Policy and development strategies to prevent unlawful workplace harassment and retaliation in the workplace.
5. Maintain and analyze data on workforce utilization and employment practices, including records of all complaints and grievances alleging discriminatory practices.
6. Advise management of the EEO Program’s impact and effectiveness.
7. Provide or coordinate training for management and employees.
8. Provide confidential consultation for management and employees in matters involving EEO concerns.
9. Ensure federal laws prohibiting job discrimination are posted in work locations where notices to applicants and employees are customarily posted and easily accessible to applicants and employees with disabilities.
10. Establish and maintain effective working relations with groups concerned with EEO and Diversity and Inclusion.
11. Coordinate programs to achieve program objectives.
12. Present information on the EEO Plan and program to management and employees on a regular basis.
13. Ensure all newly hired, promoted, or appointed supervisions and managers complete required EEO training in accordance with G.S. 126-16.1.

**IV. Identification and Correction of Problem Areas (41 CFR 60-2.17(b))**

UNC Pembroke 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, as defined by a statistical methodology, Placement Goals are set (see the Placement Goals report which follows this section).

Whether there are Placement Goals or not, 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, but are not limited to the following:

- Working with hiring managers and recruiters to determine appropriate outreach to attract qualified applicant pools;
- Recruiting at colleges and universities with a significant percentage of minority and female students;
- Publishing job advertisements in newspapers and/or magazines that target females and/or minorities;
- Offering mentorship programs for female and minority employees;
- Offering job training to females and minorities currently employed by the university in order to increase their chances of advancement;
- Offering tuition reimbursement to employees to obtain training that will increase their chances of advancement;
- Using recruitment companies that specifically target females and minorities; and
- Using the services of the respective State Employment Service, NC Works Career Center, Lumberton, NC., diversity boards as follows: Blacks in Higher Ed, Native Americans in Higher Ed, Women and Higher Ed, Veterans in Higher Ed and Disabled in Higher Ed.

## V. **Program Activities**

- **Recruitment:** UNC Pembroke reviews and monitors recruitment procedures to abolish any discriminatory practices which exist. There is a review of all recruitment literature to ensure that it includes and is relevant to all employees. Measures are implemented to improve the recruitment process as it relates to the established program objectives. The university actively recruits underutilized groups, using known resources. The university specifies measures for maintaining contact with recruitment resources and informing these resources of

employment opportunities, particularly in management, professional and technical level positions. The university remains committed to actively recruiting veterans and individuals with disabilities via outreach to various agencies, colleges and universities and the NC Community and Technical Colleges Jobs Consortium.

- **Selection:** The University ensures that job analyses are conducted to establish job-related qualifications statements, selection criteria, training needs and career ladders or to initiate any other selection procedure. The flow of applicants through the selection and appointment processes is analyzed to determine reasons for the rejection of qualified applicants from underutilized groups in areas where program objectives have been set or underrepresentation exists. The employment of individuals is monitored to ensure that the assignment of work and workplace is nondiscriminatory. The University cooperates with the Office of State Human Resources and other trained resources on the review and validation of written tests, interviews or other selection devices. All employees who screen applications and interview applicants for employment receive training in proper techniques to eliminate any potential bias. Procedures are established and approved to ensure that the selection process in underrepresented occupations reflects established program objectives and timetables. The University ensures that testing and interviewing processes are accessible to persons with disabilities. Structured interview procedures which have been documented and reviewed by the EEO Officer have been developed and implemented.
- **Onboarding:** All employees receive a written employment letter outlining the terms and conditions of their employment. Each new employee receives a copy of the current EEO Policy Statement in their onboarding materials.
- **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. If males/non-minorities are selected at a statistically significantly lessor rate than females/minorities, a review of the applicant flow and selection decisions is also made to ensure that there is no evidence of discrimination. All employees are informed of promotional opportunities within the University as all positions are posted in the university Online Employment System and uploaded to the office of human resources website 'careers'.  
**Training:** All employees responsible for implementation and adherence to the Affirmative Action Plan are trained yearly. Managers and Supervisors receive annually mandated

training. All employees are offered training opportunities to enhance employee development through frequently offered online training through the University's Learning Management System (LMS) which offers enhancement skills training for all classifications of employees.

- **Compensation/Benefits:** Compensation, including Benefits, 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 minority versus non-minority 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, UNC Pembroke will develop a plan for greater alignment. The EEO Officer or designee reviews and monitors the salary approval process.

**Performance Evaluation:** The University's Performance Management system is an automated tool. Managers and Supervisors are trained yearly to administer the Performance Management tool effectively and without bias. Annual ratings are analyzed to ensure to look for anomalies and to ensure that employee performance is accurately reflected. UNC Pembroke reviews its performance evaluation system to ensure that it is free from bias at least annually. In addition, managers and supervisors will be encouraged to accomplish EEO goals in their respective areas and for monitoring performance ratings of all covered employees for trends and patterns.

- **Transfer and/or Separation:** For transfer and/or separation, if females/minorities are being involuntarily transferred or separated or are voluntarily leaving at a higher rate than males/non-minorities, a review of the employee files will be made to ensure the university is applying its policies and procedures for transfer or separation equally for protected as well as non-protected classes. If males/non-minorities have a statistically significant higher rate of transfer or separation than females/minorities, an investigation will also be conducted to determine the cause. Exit Interviews are conducted with all employees leaving the university voluntarily. This information is then analyzed and shared with top management as appropriate.
- **Disciplinary Process:** All employees are provided equitable treatment in accordance with the Employee Disciplinary, Appeal and Grievance policy. Disciplinary data is analyzed annually to ensure equitable treatment and identify potential discrepancies in employee treatment or potential bias.
- **Grievance Process:** The University ensures fair and equitable review of all complaints and adheres to the process as outlined in the University Grievance policy. The grievance process is administered fairly without bias and ensures that prohibition of retaliation is emphasized.

**Equal Employment Opportunity and Diversity Fundamental (EEOFDF):**

Managers and supervisors hired, promoted, or appointed on or after July 1, 1991, are highly encouraged to participate in the EEOFDF or other OSHR approved diversity program within twelve (12) months of assuming the role. Managers and supervisors hired prior to July 1, 1991, are encouraged to participate in EEOFDF. New supervisors and managers are notified about EEOFDF by the Office of Human Resources. They receive an email notifying them of the mandatory training with a link to the [North Carolina Learning Center](#). After creating an account on the North Carolina Learning Center, new supervisors and managers can complete the online modules well in advance of the one-day face-to-face training.

**Reduction in Force Procedures:** UNC Pembroke has the authority to separate an employee whenever it is necessary due to shortage of funds or work, abolishment of a position, or other material change in duties or organization. UNC Pembroke complies with the State Human Resources Reduction in Force policy and the Reduction in Force Priority policy. Retention on employees in classes affected shall be based on a systematic consideration, at a minimum of the following factors:

- a. Type of appointment
- b. Relative efficiency
- c. Actual or potential adverse impact on the diversity of the workforce
- d. Length of service

UNC Pembroke shall notify the employee in writing of separation as soon as possible and in any case not less than thirty (30) calendar days prior to the effective date of separation. The written notification shall include the reasons for the reduction in force, expected date of separation, the employee’s eligibility for priority reemployment consideration, applicable appeal rights, and other benefits available. An employee separated through reduction in force may appeal the separation only on the grounds listed in the Employee Grievance Policy.

Pursuant to the State Human Resources Manual, employees with career status (as defined by G.S. 126-1.1), who have received official written notification of imminent separation due to reduction in force, are eligible for priority consideration under the provisions outlined in the Manual. An employee shall receive priority consideration for a period of twelve (12) months from the date of the official written notification.

**Harassment Prevention Strategies:** State of North Carolina Unlawful Workplace Harassment Policy (excerpt): All employees have the right to work in an environment free from discrimination and harassing conduct. No State employee will engage in conduct that falls under the definition of unlawful workplace harassment, including sexual harassment, or retaliation, and no employment decisions will be made on the basis of race, sex, religion, national origin, age, color, disability, or genetic information.

**Strategy #1 – Commitment by the University to the prohibition of unlawful workplace harassment, sexual harassment and retaliation.** Any supervisor who witnesses such harassment or is otherwise

informed of a violation of this policy is directed to bring this to the immediate attention of the EEO Officer or HR. Failure of a supervisor (or others) with such knowledge to promptly advise the EEO Officer or HR is grounds for disciplinary action up to and including dismissal.

The investigation of any such complaint will be carried out promptly and will involve only those persons with a need to know.

Any employee found to have harassed another employee in violation of this policy is subject to disciplinary action up to and including dismissal, depending on the severity of the offense.

Employees who feel that they have been subjected to Discrimination, Harassment or Retaliation may file a complaint with the Office of Human Resources (OHR). OHR will investigate the complaint and provide a written response to the Complainant and Respondent within sixty (60) calendar days of receipt of the complaint.

**Strategy #2 – Training and other methods to prevent harassing actions.** All university employees are required to complete mandatory annual training on prevention and reporting of unlawful harassment mandated in August of each year. Online modules for refresher training are housed in the university Learning Management System and are available to all employees anytime.

**Strategy #3 – A Process for disseminating information prohibiting unlawful workplace harassment and retaliation to all University employees.** In addition to mandated yearly training and ongoing emphasis to university managers, in depth information and the process for reporting complaints are prominently posted on the Office of Human Resources website complete with the point of contact for all inquiries.

UNIVERSITY of NORTH CAROLINA  
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**VI. Goals Attainment Report 2021\***

**Job Group – SHRA:**

Student Services Specialist	Black Female	Goal Met
Protective Services	White Female	Remains Goal
Administrative Support	Black Male	Remains Goal
Administrative Support	White Male	Goal Met
Building and Grounds	Black Male	Remains Goal **
Building and Grounds	White Male	Goal Met
Building and Grounds	White Female	Goal Met

\*Please note that in 2021, SHRA recruitment was greatly challenged due to the global pandemic, COVID-19. Many of our SHRA positions were cancelled and many were re-advertised several times which considerably decreased our ability to correct issues and to meet stated goals.

\*\* Note that a Black Male was offered and accepted a position in Building and Grounds but did not report to campus on the first day of employment.

**Goals Attainment for 2022**

211-Music	Female
441 – Protective Services	Black Female
600 – Skilled Trades	American Indian Female

Where the university has not been successful in meeting goals that have been established, the University is committed to notifying the Hiring Managers in these areas of the goals and working to identify recruitment strategies to meet goals.

UNC Pembroke’s demographics in Robeson County, North Carolina, present a challenge when trying to recruit under-utilized groups in SHRA areas. The BO170 Report indicates that the university should target females & white males in all of the SHRA employment categories compared to reporting low to none American Indian labor force expectations. Please see Robeson County demographic breakdown at <https://www.census.gov/quickfacts/robesoncountynorthcarolina>

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

Programs have been instituted to ensure no barriers to employment exist. These programs may include, but are not limited to, the following:

1. Conducting annual analyses of job descriptions to ensure job functions are accurately reflected;
2. Providing job descriptions 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. EEO Coordinator reviews hiring recommendations before an employment offer is made.
  - b. Offer/employment letters are issued to new hires (contain information such as job title and salary);
  - c. Reviewing job applications and other pre-employment forms to ensure information requested is job-related;
  - d. Evaluating selection methods that may have a disparate impact to ensure the methods are job-related and consistent with business necessity;
  - e. Training management staff on proper interview and selection procedures; and
  - f. Training on EEO and other related policies for management and supervisory staff.
4. Using techniques to improve recruitment and retention and to increase the flow of qualified applicants, including minority and female applicants, UNC Pembroke undertakes the following actions:
  - a. Includes the EEO tagline “***UNC Pembroke is an Equal Opportunity Employer. The University prohibits discrimination against qualified individuals based on their status as protected veterans or individuals with disabilities, and prohibits discrimination against all individuals based on their age, race, color, genetic information, religion, sex, sexual orientation, gender identity or expression or national origin,***” or other acceptable tagline in all printed employment advertisements;
  - b. Places employment advertisements in local minority news media and women’s interest media;
  - c. Disseminates information on job opportunities to organizations representing minorities and women and to employment development agencies when job opportunities become available;

- d. Encourages all employees to refer qualified applicants;
  - e. Actively recruits at secondary schools, junior colleges, colleges and universities with predominantly minority or female enrollments; and
  - f. Requests employment agencies to refer qualified minorities and women.
  - g. Utilizes enhanced advertising via LinkedIn, Higheredjobs, and social media outlets.
5. Reviews university's compensation practices;
6. Ensures that all employees are given equal opportunity for promotions and/or transfers. This is achieved by:
- a. Posting opportunities internally;
  - b. Offering guidance to employees in identifying opportunities, training and educational programs to enhance promotions and opportunities for job rotation or transfer; and
  - c. Evaluating job requirements to ensure that they are appropriate.
7. Employees and applicants of UNC Pembroke will not be subject to harassment, intimidation, retaliation, 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 equal employment opportunity.
8. **Reasonable Accommodation to Physical and Mental Limitations** (41 CFR 60-300.44(d))

As a matter of nondiscrimination, it is UNC Pembroke's policy to make reasonable accommodation to the known physical or mental limitations of an otherwise qualified disabled 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 disabled 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 manager or appropriate staff member in the office of human resources will 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, he/she will be asked whether a reasonable accommodation is needed. ***Moreover, accommodations are available to any qualified employee with a disability.***

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

9. **Reasonable Accommodation for Religious Purposes:** UNC Pembroke also grants religious reasonable accommodations upon request unless such request causes undue hardship. This applies to employees and applicants who are covered under this EEO Plan.
10. **Employment First:** In March 2019, Governor Roy Cooper signed Executive Order (EO) #92, (Employment First for North Carolinians with Disabilities). The EO makes Employment First the policy of state agencies to reflect the state's goals to be a leader in recruiting workers with disabilities and making an inclusive job climate for those workers. UNC Pembroke complies with federal and state laws governing reasonable accommodation (i.e. ADA, ADAAA, Title VII of the Civil Rights Act as amended, EO #92, etc.). UNC Pembroke provides reasonable accommodations to applicants and employees and is improving recruitment and outreach efforts to attract qualified individuals with disabilities.
11. **Pregnancy Workplace Adjustments:** In December 2018, Executive Order #82 (Promoting Health and Wellness by Clarifying Protections Afforded to Pregnant State Employees) was issued by Governor Roy Cooper. This Executive Order required that state agencies extend workplace protections and modifications to pregnant employees upon request, unless doing so would impose significant burdens or costs. Although UNC Pembroke is not subject to the Governor's oversight, we are committed to extending workplace protections to pregnant and parenting employees upon request, unless doing so would impose significant burden or cost.
12. **Salary History:** In April 2019, Executive Order #93 (Prohibiting the Use of Salary History in the State Hiring Process) was issued by Governor Roy Cooper. This Executive Order prohibited state agencies from requesting salary history from applicants or relying on previously obtained prior salary information in determining an applicant's salary. OSHR was required to remove the employment history fields from the state application. UNC Pembroke does not request salary history from applicants on its applications nor does the university rely on previous salary information in determining an applicant's salary.
13. **Policies Prohibiting Discrimination, Harassment, and Retaliation in State Employment, Services and Contracts under the Jurisdiction of the Office of the Governor:** UNC Pembroke supports Executive Order 24 which specifically prohibits discrimination based on transgender status. UNC Pembroke has in place policies which protect individuals without regard to sexual orientation and gender identity or expression.

#### **VIII. 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 total program can be monitored for effectiveness, and management can be kept

informed. UNC Pembroke's audit and reporting system is designed to:

1. Measure the effectiveness of the AAP/EEO program;
2. Document and analyze personnel activities;
3. Identify problem areas and develop action plans where remedial action is needed; and
4. Determine the degree to which 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 age, race, color, gender, religion, national origin, genetic information or disability:

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. Performance management evaluation.
8. Discipline and grievance procedures.

The following documents may be maintained as a component of UNC Pembroke'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 university's compensation system and decisions.

UNC Pembroke's audit system includes periodic review of employment decisions. Managers and supervisors are informed to report any current or foreseeable EEO problem areas and are requested to outline suggestions/recommendations for solutions. If problem areas arise, the manager or supervisor is to report problem areas immediately to the EEO Officer or her designee. During the reporting cycle, the following occurs:

1. The EEO Officer or her designee will discuss any problems relating to significant rejection ratios, EEO charges, etc., with management; and
2. The EEO Officer or her designee will report the status of the university's AAP goals

and objectives to management. The EEO Officer or her designee will recommend remedial actions for the effective implementation of the AAP.

3. Data is exported from the online employment system, PeopleAdmin (applicant information) and from Banner (employee information) annually for the AAP and imported into Learning Technologies Group (CAAMS) for generation of EEO Reports and the AAP. In addition, UNC Pembroke reviews the UNC System Office DataMart data. The goals for UNC Pembroke are established after a careful review of reports from both DataMart and Learning Technologies Group (CAAMS) which includes SHRA and EHRA employees of UNCP.
4. UNC Pembroke follows the Office of State Human Resources' Reduction of Force Policy (see Appendix "B").
5. UNC Pembroke follows the University of North Carolina System Grievance policy.

**IX. Internal Dissemination:**

In an effort to promote Affirmative Action for qualified women and minorities, UNC Pembroke has developed internal communications that foster understanding, acceptance, and support among the university's executive, management, and supervisory personnel. Additionally, all other 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 women and minorities.

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

- i. Copy of our AAP for Women and Minorities will be made available for inspection to any employee or applicant upon request to promote understanding, acceptance and support;
- ii. Policies are re-emphasized to managers and supervisors annually;
- iii. UNC Pembroke's Policy Statement, the EEO Poster and the EEO is the Law Supplemental Poster are all posted on bulletin boards throughout our facilities and work areas. These posters, as well as other required posters, are also posted on the "Careers at UNC Pembroke" section of the UNC Pembroke website for applicants and employees.

- iv. All women and minorities are invited to self-identify if they wish to benefit under this Affirmative Action program.
- v. The Affirmative Action Plan is posted online on the EEO/AA section of the UNC Pembroke Office of Human Resources website. A hard copy is also maintained with required and supporting reports by the EEO Coordinator. Review of these materials is permitted by visitors between 8:00 a.m. and 5:00 p.m., Monday through Friday.  
All employees and prospective employees are informed of the university's commitment to engage in affirmative action to increase employment opportunities for women and minorities. The university periodically schedules special meetings with all employees to discuss policy and explain individual employee responsibilities.
- vi. The policy link is publicized in the university's Brave's Bulletin, UNCP Today and is presented during annual reports;
- vii. Special meetings with executive, management and supervisory personnel and held to explain the intent of the affirmative action policy and individual responsibility for effective implementation, communicating the university's mission and values.
- viii. The policy is discussed in both employee onboarding and management training programs;
- ix. Meet with employee representatives to inform them of the university's policy and request their cooperation;
- x. Articles on accomplishments on women and minorities are included in university publications.

**X. External Dissemination:**

UNC Pembroke will undertake appropriate outreach and positive recruitment efforts in order to effectively attract women and minorities. In order to comply with the external dissemination of the affirmative action policy, UNC Pembroke notifies (via the use of purchase order, contract or Certificate of Compliance) all subcontractors, vendors and suppliers of UNC Pembroke's EEO and AA policy, regarding its affirmative action efforts and requesting appropriate action on their part.

- 1. All recruiting sources, including the employment agencies, educational institutions and social service agencies of UNC Pembroke's policy concerning the employment of

women and minorities have been advised to actively recruit and refer qualified persons for job opportunities;

2. The NC Works Career Center, North Carolina Department of Commerce, in Lumberton, North Carolina;

UNC Pembroke will also consider the following a part of outreach and recruitment efforts for females and minorities:

1. Facilitate formal briefing sessions to invite representatives from recruitment sources and placement agencies to tour UNC Pembroke, discuss current and prospective position openings, job descriptions and required qualifications and explanations of the university's selection procedures.
2. Local job fairs sponsored by support groups for women and minorities.
3. Email job openings to Historically Black Colleges, Universities and Historically Female Colleges and Universities and Historically Minority Serving Institutions.

As part of the outreach and positive recruitment efforts for women and minorities, the university will

1. Incorporate special efforts to reach students who are women and minorities whenever the university reaches out to educational institutions;
2. An effort will be made to participate in work-study programs with rehabilitation facilities which specialize in training or educating women and minorities;
3. Make available women and minorities for participation in career days, youth motivation programs and related activities in their communities;
4. Execute positive steps to attract women and minorities not currently in the workforce who have requisite skills and can be recruited through affirmative action measures.
5. In making hiring decisions, consider applicants who are known as women and minorities for all available positions for which they may be qualified when the position(s) applied for is unavailable; and
6. List all job opening with NC Works Online, [northcarolinadiversity.com](http://northcarolinadiversity.com) (Circa), [veteransinhighered.com](http://veteransinhighered.com), [disabledinhighered.com](http://disabledinhighered.com), [blacksinhighered.com](http://blacksinhighered.com), [nativeamericansinhighered.com](http://nativeamericansinhighered.com) and [womenandhighered.com](http://womenandhighered.com).

## **Appendix “A” – North Carolina Equal Employment Opportunity Policy**

The State of North Carolina provides equal employment opportunities to all employees and applicants for employment and prohibits discrimination, harassment or retaliation based on race, religion, color, national origin, ethnicity, sex, pregnancy, gender identity or expression, sexual orientation, age (40 or older), political affiliation, National Guard or veteran status, genetic information, or disability. The State also recognizes that an effective and efficient government requires the talents, skills and abilities of all qualified and available individuals, and seeks opportunities to promote diversity and inclusion at all occupational levels of State government’s workforce through equal employment opportunity (EEO) workforce planning initiative.

The State is committed to ensuring the administration and implementation of all human resources policies, practices and programs are fair and equitable. State agencies, departments and universities shall be accountable for administering all aspects of employment, including hiring, dismissal, compensation, job assignment, classification, promotion, reduction-in-force, training, benefits and any other terms and conditions of employment in accordance with federal and State EEO laws and policies.

Employees shall not engage in harassing conduct, and if harassing conduct does occur, it should be reported. Managers and supervisors maintain a critical role and responsibility in preventing and eliminating harassing conduct in our workplace. See the Unlawful Workplace Harassment policy of the State Human Resources Manual for provisions related to unlawful harassment, including sexual harassment.

Acts of retaliation against an employee who engages in protected activity or the exercise of any appeal or grievance right provided by law will not be tolerated in our workplace.

### **Coverage**

Individuals protected by provisions of this policy are:

1. current employees;
2. former employees; and
3. job applicants

### **Veterans**

Job discrimination of veterans shall be prohibited, and affirmative action shall be undertaken to employ and advance in employment eligible veterans in accordance with Article 13 of G.S. 126 and G.S. 128-15.

See the Veteran’s Preference policy in the State Human Resources Manual for provisions related to veteran’s preference including the employment and advancement of protected veterans.

## Office of State Human Resources Responsibilities

The Office of State Human Resources (OSHR) shall:

1. establish the EEO Plan Requirements and Program Guidelines in accordance with federal and state laws to be followed by all agencies, departments and universities, to ensure commitment to and accountability for equal employment opportunity throughout State government;
2. review, approve and monitor all EEO plans and updates;
3. provide services of EEO technical assistance, training, oversight, monitoring, evaluation, support programs, and reporting to ensure that State government's work force is diverse at all occupational levels;
4. develop and promote EEO programs and best practices to encourage consistent and fair treatment of all State employees; and
5. meet with agency heads, department heads, and university chancellors, Human Resources Directors and EEO Directors/Officers annually to discuss the progress made toward reaching program goals.

Agency, Department and University Responsibilities:

Each Agency Head, Department Head and University Chancellor shall:

1. adhere to the policies and programs that have been adopted by the State Human Resources Commission and approved by the Governor;
2. ensure the agency, department or university's commitment to EEO is clearly communicated to all employees;
3. ensure that Human Resources policies and employment practices are implemented consistently and fairly;
4. designate an EEO Officer/Director who has access to the agency head, department head or university chancellor to be responsible for the operation and implementation of the EEO Plan;
5. provide the necessary resources to ensure the successful implementation of the EEO Program;
6. ensure each manager and supervisor has, as a part of his or her performance plan, the responsibility to comply with EEO laws and policies, and assist in achieving EEO goals

established by the agency, department or university;

7. ensure the EEO Plan is designed in accordance with the EEO Plan Requirements and Program Guidelines as specified by the Office of State Human Resources;

8. ensure the EEO Plan is submitted by March 1st of each year to the Office of State Human Resources for review and approval as required by G.S. 126-19;

9. ensure all employees are made aware of the EEO policy including the Unlawful Workplace Harassment Policy found in the State Human Resources Manual;

10. develop strategies to prevent unlawful workplace harassment and retaliation in the workplace;

11. ensure required employee notices describing Federal laws prohibiting job discrimination are posted in work locations where notices to applicants and employees are customarily posted and easily accessible to applicants and employees with disabilities;

12. maintain records of all complaints and grievances alleging discriminatory practices; and

13. ensure all newly hired, promoted, or appointed supervisors and managers complete required EEO training in accordance with G.S. 126-16.1. See the Equal Employment Opportunity Diversity Fundamentals policy located in the State Human Resources Manual for information related to EEO training.

#### Complaint Process

An individual covered by this policy who is alleging unlawful discrimination, harassment or retaliation may file a complaint following the process outlined in the Employee Grievance Policy located in the State Human Resources Manual. For the purpose of this policy, political affiliation is not a protected classification under federal EEO law but may be grieved pursuant to G.S. 126-34.02 as a contested case after completion of the agency grievance procedure and the Office of State Human Resources review.

## **Appendix “B” - Reduction in Force Policy**

### **Policy**

An agency or university has the authority to separate an employee whenever it is necessary due to:

- Shortage or loss of funds;
- Shortage or loss of work;
- Abolishment of a position; or
- Other material changes in position duties or organization

No loss of funds shall be required as a precondition for a reduction in force; however, an agency or university may not use the RIF process to circumvent the disciplinary process required to separate or demote an employee for a disciplinary reason. RIF procedures also apply to position or budgetary changes that result in an involuntary reduction in an employee’s work hours.

### **Retention Factors**

Retention of employees in classes affected by a RIF action shall be based on a fair and systematic consideration, at a minimum, of the following factors:

- Type of appointment;
- Relative efficiency;
- Actual or potential adverse impact on the diversity of the work force; and
- Length of service.

Although all retention factors must be evaluated, they may be weighted differently for each RIF event to meet the needs of the employing agency or university.

### **Area of Analysis for RIF:**

The analysis may include all or part of an agency (a unique work unit, division or entire agency/university). Differences in operation, work function, funding source, staff, and personnel administration may be considered when determining the appropriate area of analysis. However, the analysis to avoid a RIF must apply to the entire agency/university.

1. Type of Appointment: Neither temporary nor probationary employees in their initial 12 months of employment (or initial 24 months of employment for sworn law enforcement officers) shall be retained in classes in which employees with permanent appointments (those who have satisfactorily completed a probationary or equivalent trial period) must be separated in the same or related class.
2. Relative Efficiency: Relative efficiency shall be expressed as the employee’s most recent overall performance rating. Management may also consider the rating for each individual or institutional goal and value when overall performance ratings are equivalent, documented employee skills and ability to perform the remaining work required of class members after the implementation of the RIF, and any active disciplinary action(s) received by the employee.

3. Actual or Potential Adverse Impact: In accordance with federal guidelines affecting equal employment opportunity and affirmative action, all decisions concerning reduction-in-force must be analyzed to determine their impact on agency utilization goals based on race and sex to avoid adverse impact in violation of Section 4.d of the Uniform Guidelines on Employee Selection Procedures as applied to selection rates for separation through RIF.

4. Length of Service: Total state service determines length of service credit. In determining the length of service credit, an eligible veteran shall be accorded one year of state service for each year, or fraction thereof, of military service, up to a maximum of five (5) years of credit.

### **Avoiding a RIF**

A decision to implement a RIF must be reached only after the systematic consideration of actions designed to avoid the layoff. These actions may include but are not limited to the elimination of vacant positions; reduction in non-personnel related expenses; placement in a vacant position for which the employee qualifies; or retraining employees to facilitate placement in other positions at the agency or university.

### **Office of Human Resources Responsibility**

The responsibilities of the Office of State Human Resources (OSHR) shall include, but are not limited to the following:

1. Establishing the Reduction in Force (RIF) Plan Requirements and Program Guidelines to be followed by all agencies and universities to ensure commitment to, and accountability throughout, State Government;
2. Reviewing, approving and monitoring RIF plans and updates;
3. Providing technical assistance, training, oversight, monitoring, evaluation, and support to the RIF program; and
4. Developing, updating, and maintaining the RIF Priority Verification List database system.

### **Agency or University Responsibility**

The responsibilities of each Agency Head, Department Head and University Chancellor, or their designees, shall include:

1. Adhering to the RIF policy and programs that have been adopted by the State Human Resources Commission and approved by the Governor;
2. Submitting RIF plans and any necessary updates for approval by OSHR a minimum of one week prior to notifying employees of RIF actions; and
3. Submitting employee information within 30 days of RIF notification to OSHR to maintain the RIF Priority Verification List.

### **Notification Requirements**

The employing agency or university shall notify the employee in writing as soon as possible and in any case no fewer than 30 calendar days prior to the effective date of separation. The written notification shall include the reasons for the reduction-in-force, expected date of separation, the

employee's eligibility for priority reemployment consideration, applicable appeal rights, and other benefits available.

### **Appeals**

An employee separated through a reduction in force may appeal the separation only on the grounds listed in the applicable Employee Grievance Policy.

### **Leave**

Vacation Leave: Employees may request, subject to approval by management, to exhaust vacation leave and be paid in a lump sum for the balance not to exceed 240 hours. If an employee had over 240 hours of vacation leave at the time of their separation the excess leave shall be reinstated when reemployed within one year after separation. Bonus Leave: Bonus leave will be paid in a lump sum if eligible.

Sick Leave: Employees separated due to reduction-in-force shall be informed that their sick leave shall be reinstated if employed in any agency or university within five years

UNIVERSITY *of* NORTH CAROLINA  
PEMBROKE

**AFFIRMATIVE ACTION PROGRAM**

**For**

**PROTECTED VETERANS**

UNIVERSITY of NORTH CAROLINA  
PEMBROKE

**AFFIRMATIVE ACTION PROGRAM FOR  
PROTECTED VETERANS**

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**a. Review of Personnel Processes (41 CFR 60-300.44(b))**

UNC Pembroke's overall workforce is currently composed of 4.70% of veterans. During 2020 -2021, UNC Pembroke experienced a number of retirements and resignations which included several employed veterans with 20+ years' service.

UNC Pembroke periodically reviews personnel processes to determine whether its present procedures ensure careful, thorough, and systematic consideration of the qualifications of known 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, UNC Pembroke limits its consideration of a 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. The personnel processes do not stereotype protected veterans in a manner which limits their access to all jobs for which they are qualified.

Based upon UNC Pembroke's review of its personnel processes, UNC Pembroke will modify the personnel processes as necessary, and will include the development of new procedures in this Affirmative Action Program to ensure Equal Employment Opportunity. The following is a set of procedures which is used to meet the requirements of §60-300.44(b):

1. The application or personnel form of each known applicant who is a protected veteran is annotated to identify each vacancy for which the applicant was considered, and the form is quickly retrievable for review by the Department of Labor and the contractor's personnel officials for use in investigations and internal compliance activities.
2. The personnel or application records of each known protected veteran includes (i) the identification of each promotion for which the protected veteran was considered, and (ii) the identification of each training program for which the protected veteran was considered.
3. In each case where an employee or applicant who is a protected veteran is rejected for employment, promotion, or training, the university prepares a statement of the reason as well as a description of the accommodations considered (for a rejected disabled veteran). The statement of the reason for rejection (if the reason is medically related), and the description of the accommodations considered, is treated as confidential medical records in accordance with §60-300.23(d). These materials are made 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 he or she to place a disabled veteran on the job, a record is made containing a description of the accommodation. The record is treated as a confidential medical record in accordance with §60-300.23(d).

**b. Physical and Mental Qualifications (41 CFR 60-300.44(c))**

The physical and mental job qualifications of all jobs are reviewed as a part of the classification process prior to a requisition being opened to determine whether or not the qualifications tend to screen out qualified disabled veterans. Physical and mental job qualifications are also reviewed as new jobs are established or job requirements are modified to ensure that, to the extent that such qualification requirements tend to screen out 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.

If UNC Pembroke ever applies physical or mental qualification standards in the selection of applicants or employees for employment or other change in employment status such as promotion, demotion or training, to the extent that qualification standards tend to screen out qualified disabled veterans, the standards shall be related to the specific job or jobs for which the individual is being considered and consistent with business necessity.

**c. Reasonable Accommodation to Physical and Mental Limitations (41 CFR 60-300.44(d))**

As a matter of nondiscrimination, it is UNC Pembroke's policy to make reasonable accommodation to the known physical or mental limitations of an otherwise qualified disabled 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 disabled 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 manager or appropriate HR personnel will 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, he/she will be asked whether a reasonable accommodation is needed.

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. UNC Pembroke makes every effort to provide suitable employment for those employees who become disabled while employed by us.

**d. Harassment Prevention Procedures (41 CFR 60-300.44(e))**

Employees and applicants of UNC Pembroke 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 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 protected veteran should promptly contact a manager in their chain of command, or promptly contact the EEO Officer for assistance. This policy is posted for employees and applicants to view.

**e. External Dissemination of Policy, Outreach, and Positive Recruitment (41 CFR 60-300.44(f))**

UNC Pembroke will undertake appropriate outreach and positive recruitment efforts in order to effectively attract protected veterans. In order to comply with the external dissemination of the affirmative action policy, UNC Pembroke notifies (via the use of purchase order, contract or Certificate of Compliance) all subcontractors, vendors and suppliers of UNC Pembroke's EEO and AA policy regarding its affirmative action efforts and requesting appropriate action on their part.

Examples of outreach and positive recruitment which UNC Pembroke utilizes throughout the year may include contacting the following:

1. All recruiting sources, including employment agencies, educational institutions and social service agencies of UNC Pembroke's policy concerning the employment of protected veterans and have been advised to actively recruit and refer qualified persons for job opportunities;
2. Local Veterans' Employment Representative at the Division of Employment Security, North Carolina Department of Commerce in Lumberton, North Carolina;
3. The veterans' counselors and coordinators on college campuses, including the Director of Academic and Military Outreach at UNC Pembroke;
4. The service officers of the national veterans' groups active in the local area;
5. Local veterans' groups and veterans' service centers in the local area, including the VA Medical Center in Fayetteville, North Carolina;
6. The Department of Defense Transition Assistance Program (TAP);
7. Any organization listed in the Employer Resources section of the National Resource Directory.

UNC Pembroke will also consider the following as part of outreach and recruitment efforts for protected veterans:

1. Facilitate 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 university's selection procedures.
2. Local job fairs sponsored by support groups for protected veterans.
3. Posting job openings with the Department of Veterans Affairs Regional Office nearest the establishment.

As part of the outreach and positive recruitment efforts for protected veterans, the university will:

1. Incorporate special efforts to reach students who are protected veterans whenever the university reaches out to educational institutions;
2. An effort will be made to participate in work-study programs with the Department of Veterans Affairs rehabilitation facilities which specialize in training or educating disabled

veterans;

3. Establish meaningful contacts with appropriate veterans' service organizations which serve protected veterans for purposes as advice, technical assistance, and referral of potential employees. Technical assistance from the resources described in this paragraph may consist of advice on proper placement, recruitment, training and accommodations contractors may undertake, but no such resource providing technical assistance shall have authority to approve or disapprove the acceptability of affirmative action programs;
4. Make available protected veterans for participation in career days, youth motivation programs, and related activities in their communities;
5. Execute positive steps to attract protected veterans not currently in the work force who have requisite skills and can be recruited through affirmative action measures. These persons may be located through the local chapters of veterans' organizations;
6. In making hiring decisions, consider applicants who are known protected veterans for all available positions for which they may be qualified when the position(s) applied for is unavailable; and
7. List job openings with NC Works Online, northcarolinadiversity.com (CIRCA), and veteransinhigherededucation.com.
8. The Affirmative Action Plan and Policy Statement are posted on UNC Pembroke's Human Resources website at <http://www.uncp.edu/facultystaff/human-resources/eeoaa>

**f. Internal Dissemination of Policy (41 CFR 60-300.44(g))**

In an effort to promote positive Affirmative Action for qualified protected veterans, UNC Pembroke has developed internal communications that foster understanding, acceptance, and support among the university's executive, management, and supervisory personnel. Additionally, all other 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 management personnel and other employees. In order to ensure greater employee cooperation and participation in the university's Affirmative Action efforts, UNC Pembroke has adopted and disseminated an internal policy. This policy's dissemination may include but is not limited to the following:

1. Copy of our 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. UNC Pembroke's Policy Statement, the EEO poster and the EEO is the Law Supplemental

Posters are all posted on bulletin boards located throughout our facilities and work areas. These posters, as well as other required labor posters, are also posted on “Careers at UNC Pembroke” section of the website for applicants and employees. The Affirmative Action Plan is posted online on the EEO/AA Section of the Office of Human Resources website. A hard copy is also maintained with required and supporting reports by the EEO Coordinator. Review of these materials is permitted by visitors between 8:00 am and 5:00 pm, Monday through Friday.

4. All employees who believe they are a 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. The policy is included in the university's policy manual or otherwise made available to employees;
6. All employees and prospective employees are informed of the university’s commitment to engage in affirmative action to increase employment opportunities for protected veterans. The university periodically schedules special meetings with all employees to discuss policy and explain individual employee responsibilities;
7. The policy link is publicized in the university’s Brave’s Bulletin, UNCP Today, and is presented during annual reports;
8. Special meetings with executive, management, and supervisory personnel are held to explain the intent of the affirmative action policy and individual responsibility for effective implementation, communicating the Chancellor's mission and values;
9. The policy is discussed in both employee orientation and management training programs;
10. Meet with employee representatives to inform them of the university’s policy and request their cooperation;
11. Articles on accomplishments of protected veterans are included in university publications; and
12. When employees are featured in university publications, protected veterans are included.

**g. Audit and Reporting Systems (41 CFR 60-300.44(h))**

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

1. Measure the effectiveness of the university's programs;
2. Identify problem areas where remedial action is needed;
3. Determine the degree to which UNC Pembroke's AAP goals and objectives have been attained;
4. Determine whether known protected veterans have had the opportunity to participate in all university-sponsored educational, training, social and recreational activities;
5. Measure the compliance with the affirmative action program's specific obligation for protected veterans; and
6. Document the above-mentioned activities.

The following activities are reviewed at least annually to ensure freedom from stereotyping 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.

UNC Pembroke's audit system includes periodic reports documenting UNC Pembroke'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 Assistant Vice Chancellor of Human Resources will discuss any problems relating to significant rejection ratios, EEO charges, etc., with management; and
2. The Assistant Vice Chancellor of Human Resources will report the status of the university's AAP goals and objectives to management. The Assistant Vice Chancellor of Human Resources will recommend remedial actions for the effective implementation of the AAP.

## **h. Responsibility for Implementation (41 CFR 60-300.44(i))**

### **A. Responsibilities of EEO Officer:**

The Assistant Vice Chancellor of Human Resources is responsible for the overall execution, implementation and monitoring of the Affirmative Action Program for protected veterans with the support of all management, including senior management.

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

1. The development of the AAP for 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 UNC Pembroke's Affirmative Action obligations;
3. Reviewing the qualifications of all applicants and employees to ensure protected veterans are treated in a nondiscriminatory manner when hiring, promotion, transfer and termination actions occur;
4. 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;
5. Inform management of equal opportunity progress and problems within the university through, at a minimum, periodic reports;
6. Providing department managers with a copy of the AAP for Protected Veterans and reviewing the program with them on an annual basis to ensure knowledge of their responsibilities for implementation of the program;
7. Reviewing the university's AAP for protected veterans with all managers and supervisors at all levels to ensure that the policy is understood and is followed in all personnel activities;
8. Serving as a liaison between UNC Pembroke and enforcement agencies; and
9. Serving as a liaison between UNC Pembroke and organizations for protected veterans.

## **B. Responsibilities of Managers and Supervisors:**

Managers and supervisors are advised annually of their responsibilities under the university's AAP for protected veterans and of their obligations to:

1. Review the university's Affirmative Action policy for 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. 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
3. Review all employees' performance to ensure that non-discrimination is adhered to in all personnel activities.

### **i. Training (41 CFR 60-300.44(j))**

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.

UNIVERSITY *of* NORTH CAROLINA  
PEMBROKE

**AFFIRMATIVE ACTION PROGRAM**

**For**

**INDIVIDUALS WITH DISABILITIES**

UNIVERSITY of NORTH CAROLINA  
PEMBROKE

**AFFIRMATIVE ACTION PROGRAM FOR  
INDIVIDUALS WITH DISABILITIES**

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## I. **Review of Personnel Processes (41 CFR 60-741.44(b))**

UNC Pembroke periodically reviews personnel processes to determine whether its present processes provide for careful, thorough, and systematic consideration of the job qualifications of applicants and employees with known disabilities. 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. UNC Pembroke ensures that applicants and employees with disabilities have equal access to its personnel processes, including those implemented through information and communication technologies. Whenever requested, the university will provide necessary reasonable accommodation to ensure applicants and employees with disabilities receive equal employment opportunity in the operation of personnel processes.

UNC Pembroke will not stereotype individuals with disabilities in a manner which limits their access to all jobs for which they are qualified. The university periodically reviews its employment processes and will make any necessary modifications, if needed, to ensure that these obligations are carried out. The present personnel procedures are adequate, and, at this time, modifications are not necessary.

The following is a set of procedures used to meet the requirements of §60-741.44(b):

1. The application or personnel form of each known applicant with a disability is annotated to identify each vacancy for which the applicant was considered, and the form should be quickly retrievable for review by the Department of Labor and the university's personnel officials for use in investigations and internal compliance activities.
2. The personnel or application records of each known individual with a disability includes (i) the identification of each promotion for which the employee with a disability was considered, and (ii) the identification of each training program for which the individual with a disability was considered.
3. In each case where an employee or applicant who is an individual with a disability is rejected for employment, promotion, or training, a statement is prepared with the reason as well as a description of the accommodations considered. The statement of the reason for rejection (if the reason is medically related), and the description of the accommodations considered, is treated as confidential medical records in accordance with §60-741.23(d). 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 person is given an accommodation which makes it possible for he or she to place an individual with a disability on the job, a record is made containing a description of the accommodation. The record is treated as a confidential medical record in accordance with §60-741.23(d).

## II. **Physical and Mental Qualifications (41 CFR 60-741.44(c))**

The physical and mental job qualification standards of all jobs are reviewed periodically by UNC Pembroke. At the time jobs are established, or job requirements are modified, steps are taken to ensure

to the extent that if such qualification requirements are not met of qualified individuals with disabilities, job qualifications are consistent with business necessity and the safe performance of the job.

UNC Pembroke 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 or a change in work environment occurs.

If at any time UNC Pembroke should inquire into an employee's physical or mental condition or should conduct a medical examination prior to a change in employment status, UNC Pembroke 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.

### **III. Reasonable Accommodation to Physical and Mental Limitations (41 CFR 60-741.44(d))**

It is the university'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 operation of the university's business. If an employee with a known 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 employee will confidentially be notified of the performance problem and the manager may inquire whether the problem is related to the employee's disability. If the employee responds affirmatively, the university will confidentially inquire whether the employee is in need of a reasonable accommodation.

In determining the extent of the university's accommodation obligations, the following factors, among others, are considered:

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

Each applicant or employee's case is reviewed on an individual basis. Reasonable accommodations are made whenever possible.

### **IV. Harassment Prevention Procedures and Prohibition against Retaliation (41 CFR 60-741.44(e))**

Employees and applicants of UNC Pembroke 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 individuals with disabilities. Any employees or applicants who feel that they have been subject to harassment, intimidation, threats, coercion, or discrimination because of their disability should promptly contact a manager in their chain of command, or promptly contact the EEO Officer for assistance.

**V. External Dissemination of Policy, Outreach, and Positive Recruitment (41 CFR 60-741.44(f))**

UNC Pembroke undertakes appropriate outreach and positive recruitment activities that are reasonably designed to effectively recruit qualified individuals with disabilities. The university also notifies vendors, suppliers, and recruiting sources of their potential obligations due to conducting business with a federal contractor/sub-contractor. This notification is done through use of purchase orders, contracts, Certificate of Compliance, and/or other means of notification.

The following organizations are contacted in order to fulfill UNC Pembroke's commitment to provide equal employment opportunity for individuals with disabilities:

1. The North Carolina Division of Vocational Services (SVRA), State mental health agency, or State developmental disability agency;
2. The Employment One-Stop-Career Center (NC Works Online) and DisabledinHigherEd.com;
3. The Department of Veterans Affairs Regional Office;
4. The Employer Assistance and Resource Network (EARN);
5. Local Employment Network organizations listed in the Social Security Administration's Ticket to Work Employment Network Directory ([www.yourtickettowork.com/endir](http://www.yourtickettowork.com/endir));
6. Local disability groups, organizations, or Centers for Independent Living;
7. Placement or career offices of educational institutions that specialize in the placement of individuals with disabilities; and
8. Private recruitment sources or employment placement services that specialize in the placement of individuals with disabilities.

UNC Pembroke also undertakes or considers the following activities in order to promote equal employment opportunities for individuals with disabilities:

1. 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 university's selection procedures.
2. In the event that educational institutions are utilized as part of the recruitment efforts, a special effort is made to reach students who are individuals with disabilities.
3. Participate in work-study programs for students, trainees, or interns with disabilities.

4. Whenever the university participates in career days, youth motivation programs and related community activities, individuals with disabilities are encouraged to participate.
5. Other efforts are made to attract individuals with disabilities not currently in the work force who have requisite skills. The State and local agencies supported by the U.S. Department of Education's Rehabilitation Services Administration, local Ticket-to-Work Employment Networks and other local chapters of groups or organizations that provide services for individuals with disabilities are contacted.
6. Whenever job openings are posted, the appropriate EEO tag line is utilized which indicates individuals with disabilities are invited to apply.

At a minimum, the university reviews the outreach and recruitment efforts over the affirmative action plan period to evaluate the effectiveness in identifying and recruiting qualified individuals with disabilities.

#### **VI. Internal Dissemination of Policy (41 CFR 60-741.44(g))**

In an effort to promote positive Affirmative Action for individuals with a disability, the university has developed internal communications that foster understanding, acceptance, and support among the university's executive, management, and supervisory personnel. Additionally, all other 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 individuals with a disability.

The university 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 university's Affirmative Action efforts, UNC Pembroke has adopted and disseminated an internal policy. This policy's dissemination may include but is not limited to the following:

1. Include it in the university's policy manual or make the policy available to employees;
2. Inform all employees and applicants of its commitment to engage in affirmative action to increase employment opportunities for individuals with disabilities. The university schedules special meetings with all employees to discuss policy and explain individual employee responsibilities;
3. Publicize it in the university newspaper, magazine, annual report and other media;
4. Conduct special meetings with executive, management, and supervisory personnel to explain the intent of the policy and individual responsibility for effective implementation making clear the Chancellor's support for the affirmative action policy;
5. Discuss the policy thoroughly in both employee orientation and management training programs;

6. Include articles on accomplishments of individuals with disabilities in university publications;
7. When employees are featured in employee handbooks or similar publications for employees, include individuals with disabilities;
8. Copies of our AAP for Individuals with Disabilities will be made available for inspection to any employee or applicant upon request to promote understanding, acceptance and support. A hard copy of said policy is available during business hours in the Office of the EEO Coordinator;
9. UNC Pembroke's Affirmative Action policy and EEO poster and the EEO is the Law Supplemental Poster are all posted on bulletin boards located throughout our facilities and work areas. These posters, as well as other required labor posters, are also posted on "Careers at UNC Pembroke" section of the website for applicants and employees.
10. All employees who believe they are an individual with a disability, as defined in Section 503 of the Rehabilitation Act of 1973, 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.

## **VII. Audit and Reporting Systems (41 CFR 60-741.44(h))**

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

1. Measure the effectiveness of the university's affirmative action program;
2. Identify any problem areas where remedial action is needed;
3. If any problem areas are identified, the university will undertake necessary action to bring the program into compliance;
4. Determine the degree to which UNC Pembroke's AAP goals and objectives have been attained;
5. Determine whether known individuals with disabilities have had the opportunity to participate in all university sponsored educational, training, recreational and social activities;
6. Measure the university's compliance with the affirmative action program's specific obligations;
7. Document the actions taken to comply with obligations mentioned above and retain these documents as employment records subject to recordkeeping requirements; and
8. The online and electronic application systems are reviewed to determine if they are accessible to individuals with disabilities. The website does have a prominent statement displayed which

gives applicants with disabilities information on how to request an accommodation in order to apply if they are in need of assistance.

The following activities are reviewed at least annually to ensure freedom from stereotyping individuals with disabilities 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. In offering employment or opportunities to individuals with disabilities, the university is aware that the amount of compensation offered cannot be reduced because of any income based upon a disability-related pension or other disability-related benefit the applicant or employee receives from another source;
4. Job assignments, job classifications, job descriptions, and seniority lists;
5. Sick leaves, leaves of absence, or any other leave;
6. Training, attendance at professional meetings and conferences; and  
Any other term, condition, or privilege of employment.

UNC Pembroke's audit system includes periodic reports documenting UNC Pembroke'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 Assistant Vice Chancellor of Human Resources will discuss any problems relating to significant rejection ratios, EEO charges, etc., with management; and
2. The Assistant VC of Human Resources will report the status of the university's AAP goals and objectives to management. The Assistant Vice Chancellor of Human Resources will recommend remedial actions for the effective implementation of the AAP.

#### **VIII. Responsibility for Implementation (41 CFR 60-741.44(i))**

##### **Responsibilities of EEO Officer:**

The Assistant Vice Chancellor for Human Resources is responsible for the overall execution, implementation and monitoring of the Affirmative Action Program for persons with a disability with the support of all management. The Assistant VC for Human Resources has full support from senior management and staff needed to manage the implementation of the program.

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

1. The development of the AAP for 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 UNC Pembroke'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. Inform management of equal opportunity progress and problems within the university through, at a minimum, periodic reports;
7. Providing department managers with a copy of the AAP for Individuals with Disabilities and reviewing the program with them on an annual basis to ensure knowledge of their responsibilities for implementation of the program;
8. Reviewing the university's AAP for individuals with disabilities 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 university bulletin boards annually to ensure that compliance information is posted and is up-to-date;
10. Serving as a liaison between UNC Pembroke and enforcement agencies; and
11. Serving as a liaison between UNC Pembroke and organizations for individuals with disabilities.

### **Responsibilities of Managers and Supervisors:**

Managers and supervisors are advised annually of their responsibilities under the university's AAP for individuals with disabilities and of their obligations to:

1. Review the university's Affirmative Action policy for individuals with disabilities 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 individuals with disabilities 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.

**IX. Training (41 CFR 60-741.44(j))**

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.