Affirmative Action Program
Michigan Tech University

As a federal contractor, Michigan Technological University is required to maintain an affirmative action program to retain eligibility for federal funds. Executive Order 11246 requires federal contractors to develop an affirmative action program, "a set of specific and result-oriented procedures to which a contractor commits itself to apply every good faith effort." The objective of this program is equal employment opportunity.

The Affirmative Action Program for Michigan Technological University is dated January 1, 2018 to December 31, 2018. The program is prepared by Valerie Holzberger, Associate Director, Institutional Equity and Inclusion. The program is implemented by Beth Lunde-Stockero, Equal Opportunity Officer. The program is read and approved by Glenn Mroz, President.

______________________________
Corporate Chief Executive Officer
Glenn Mroz
President

______________________________
Corporate EEO Officer
Beth Lunde-Stockero
Equal Opportunity Officer
Table of Contents

Statement of Intent .................................................................................................................. 1
Commitment to Equal Opportunity .......................................................................................... 2

Affirmative Action Program for Females and Minorities

Dissemination of the Policy .................................................................................................... 3
Designation of Responsibility 41-CFR 60-2.17 (a) .................................................................... 4
Selection, Recruitment, and other Personnel Procedures - 41 C.F.R. § 60-2.17(b)(4) .............. 5-7
Internal Audit and Reporting Systems 41-CFR 60.217(d) ....................................................... 7
Compliance with the Sex Discrimination Guidelines 41-CFR 60-20 ........................................ 8
Availability of this Document ................................................................................................. 9

Workforce Analysis 41 CFR 60-2.11

Job Group Analysis 41 CFR 60-2.12

Determining availability 41 CFR 60-2.14

Placement Goals 41 CFR 60-2.16

Affirmative Action Program for Protected Veterans and Individuals with Disabilities

Definitions Veterans Covered 41 CFR 60-300.2........................................................................ 10
Definitions Individuals with Disabilities (IWD) 41 CFR 60-741.2 ................................................. 10
Equal Opportunity Clause for Veterans 41 CFR 60-300.5.............................................................. 11
Equal Opportunity Clause for Individuals with Disabilities 41 CFR 60-741.5.............................. 12
Applicability of the Affirmative Action Program Requirement 41 CFR 60-300.40 ...................... 13
Availability of this Document 41 CFR 60-300.41 & 41 CFR 60-741.41 ........................................ 13
Invitation to Self-Identify 41 CFR 60-300.42 & 41 CFR 60-741.42 .............................................. 13
Policy of Michigan Technological University 41-CFR 60-300.44(a) & 41 CFR 60-741.44(a) ........ 14
Review of Personnel Process 41 CFR 60-300.44(b) & 41 CFR 60-741.44(b) ............................... 15
Physical and Mental Qualifications 41 CFR 60-300.44(c) & 41 CFR 60-741.44(c) ....................... 16
Reasonable Accommodation to Physical and Mental Limitations 41 CFR 60-300.44 (d) & 41 CFR 60-741.44(d) ... 16
Harassment 41 CFR 60-300.44 (e) & 41 CFR 60-741.44(e) ........................................................... 16
External Dissemination of Policy, Outreach, and Positive Recruitment 41 CFR 60-300.44(f) & 41 CFR 60-741.44(f) ............................ 17
Examples of Outreach & Recruitment Activities 41 CFR 60-300.44 (f)(2) ................................. 17-19
Internal Dissemination of the Policy CFR 60-300.44 (g) & 41 CFR 60-741.44(g) ......................... 20
Audit and Reporting Systems 41 CFR 60-300.44(h) & 41 CFR 60-741.44(h) ............................... 21
<table>
<thead>
<tr>
<th>Topic</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Responsibility for Implementing the Policy 41 CFR 60-300.44(i) &amp; 41 CFR 60-741.44(i)</td>
<td>21</td>
</tr>
<tr>
<td>Training 41 CFR 60-300.44(j) &amp; 41 CFR 60-741.44(j)</td>
<td>22</td>
</tr>
<tr>
<td>Benchmarks for hiring 60-300.45</td>
<td>22</td>
</tr>
<tr>
<td>Utilization goals 60-741.45</td>
<td>22</td>
</tr>
<tr>
<td>Affirmative Action Invitation to Veterans 41 CFR 60-300.42</td>
<td>23</td>
</tr>
<tr>
<td>Affirmative Action Invitation to Individuals with Disabilities 41 CFR 60-741.42</td>
<td>24</td>
</tr>
<tr>
<td>VEVRAA &amp; Section 503 Reports</td>
<td></td>
</tr>
<tr>
<td>Utilization Analysis 60-741.45(d)</td>
<td></td>
</tr>
<tr>
<td>Hiring Bench Mark for Protected Veterans 60-300.45</td>
<td></td>
</tr>
<tr>
<td>Assessment of Outreach 60-300.44(f) and 60-741.44(f)</td>
<td></td>
</tr>
<tr>
<td>Data Collection Analysis 60-300.44(k) and 60-741.44(k)</td>
<td></td>
</tr>
<tr>
<td>Religion and National Origin</td>
<td></td>
</tr>
<tr>
<td>Equal opportunity clause 41 CFR 60-50.2(a)</td>
<td>25</td>
</tr>
<tr>
<td>Accommodation to religious observance and practice 60-50.3</td>
<td>25</td>
</tr>
<tr>
<td>Additional Reporting Requirements:</td>
<td></td>
</tr>
<tr>
<td>Personnel Activity Table 41 CFR 60-2.17(b)(2)</td>
<td></td>
</tr>
<tr>
<td>Personnel Activity Table IWD</td>
<td></td>
</tr>
<tr>
<td>Impact Ratio Analysis 41 CFR 60-3.4</td>
<td></td>
</tr>
<tr>
<td>Prior-Year Report</td>
<td></td>
</tr>
<tr>
<td>Goal Discussion</td>
<td></td>
</tr>
<tr>
<td>Narratives</td>
<td></td>
</tr>
<tr>
<td>Identification of Problem Areas 2.17(b), 60-741.45(e)</td>
<td></td>
</tr>
<tr>
<td>Action-Oriented Programs 2.17(c)</td>
<td></td>
</tr>
<tr>
<td>Good Faith Efforts 41 CFR 2.17(c)</td>
<td></td>
</tr>
<tr>
<td>Applicant Flow Disposition report and discussion</td>
<td></td>
</tr>
<tr>
<td>Termination Report</td>
<td></td>
</tr>
<tr>
<td>Temporary Employee Report</td>
<td></td>
</tr>
<tr>
<td>Student Employee Report</td>
<td></td>
</tr>
<tr>
<td>Utilization Factor 5</td>
<td></td>
</tr>
<tr>
<td>Utilization Factor 6</td>
<td></td>
</tr>
<tr>
<td>Exhibits and Supporting Documents (available upon request)</td>
<td></td>
</tr>
</tbody>
</table>
STATEMENT OF INTENT

The foregoing represents the Affirmative Action Program of Michigan Technological University for the program year beginning January 1, 2018. This statement affirms that all resources available will be mobilized for a good faith effort toward attaining the goals indicated.

Glenn Mroz, President

NOTE: Any portion of the Affirmative Action Program is subject to revision to meet deficiencies found or special recommendations made by the Contracts Compliance Specialist during the course of a Compliance Review. Any complaints regarding the Affirmative Action Plan may be filed with the Office of Federal Contract Compliance.
January 1, 2018

Equal Opportunity

In keeping with its responsibilities as an educational institution, Michigan Technological University is committed to a policy of affording equal opportunity to all of its employees, students, applicants for employment and applicants for admission without regard to race, religion, color, national origin, age, sex, sexual orientation, gender identity, height, weight, genetic information, or marital status. The University is also committed to a policy of educating and employing individuals with disabilities and veterans without discrimination. These policies are to be implemented with due regard for the relative qualifications of all involved.

This policy is applicable to any personnel activity or action including recruiting, selection, hiring, placement, formal and informal training (such as on-the-job training, co-op programs, and management training programs), seniority listings, transfers, promotion, layoff, recall, and termination.

Similarly, all salaries, wages, benefits, and social or recreational programs will be administered in conformity with this policy.

This policy also applies to students, residents, guests and other educational activities.

Responsibility for maintaining an audit and preparing reports relating to the University's Equal Employment Opportunity and Affirmative Action Programs is assigned to Beth Lunde-Stockero, Equal Opportunity Officer. She reports directly to me and will discuss the Affirmative Action Programs progress and problem areas.

My personal commitment to this policy is complete. It is my deliberate intention that my actions and decisions will support the spirit of this policy and program. It is incumbent upon every employee to do the same.

Glenn Mroz, President
Females and Minorities

Pursuant to Executive Order 11246, as amended, an Affirmative Action Program has been prepared for this facility. It contains goals, and actions that relate to equal opportunity in all personnel actions. To avail yourself of the benefits of this program, you are urged to contact your supervisor and the Equal Opportunity Officer.

Dissemination of the Policy

Internal

Michigan Technological University’s policy on equal opportunity is printed in the Board of Trustees Policy Manual. The policy is available to all employees through its publication on the University’s web site.

Stationery and publications of the University include the statement that Michigan Technological University is an equal opportunity educational institution/equal opportunity employer, which includes providing equal opportunity for protected veterans and individuals with disabilities. The daily publication, Tech Today, contains the same statement in the job opening section throughout the year.

The University indicates that it is an EEO employer in all newspaper and digital advertisements and required EEO signs are posted on appropriate bulletin boards and on the University’s web site.

The union contract covering the bargaining unit employees contains a statement recognizing the equal employment opportunity/affirmative action commitment of the University.

The EEO policy is communicated to managers and supervisors by means of face-to-face counseling as needed and by means of group meetings.

Both minorities and non-minorities are shown in articles, newsletters, orientation booklets, and in various other publications.

All new employees are given notice of the Equal Employment, Prohibition of Discrimination or Harassment, and Discrimination Based on Sex Policy during orientation.

The University website indicates “Michigan Technological University is an Equal Opportunity Educational Institution/Equal Opportunity Employer, which includes providing equal opportunity for protected veterans and individuals with disabilities”.

External

The equal opportunity clause appears in all contracts and purchase orders as required.

The University’s commitment to equal employment opportunity is included in all vacancy announcements and advertisements.

The University will furnish all information and reports required by Executive Order 11246 whenever requested.

Sub-contractors, vendors, and suppliers are notified of their reporting obligations under Executive Order 11246.

Both minorities and non-minorities are pictured in outside publications.
Designation of Responsibility

Responsibility for the Michigan Technological University EEO policy and supportive programs rests with the President who has delegated the responsibility for the enforcement of the policy to the Equal Opportunity Officer who reports directly to the President.

The Equal Opportunity Officer’s duties shall include but not be limited to the following:

1. Developing policy statements, affirmative action programs, internal and external communication techniques.

2. Assisting line management in arriving at solutions to problems.

3. Designing and implementing audit and reporting systems that will:
   a. Measure effectiveness of the EEO program.
   b. Indicate need for remedial action.
   c. Determine the degree to which goals and objectives have been attained.

4. Serving as liaison between the University and enforcement agencies, minority organizations, and community action groups.

5. Keeping the President informed of latest developments in the entire equal opportunity area.

6. Assisting in the identification of problem areas and establishment of local and unit goals and objectives.

7. Responding to the annual audit of hiring and promotion patterns, and analyzing patterns to identify and remove impediments to the attainment of goals and objectives.

8. Conferring with department heads, deans, and directors to assure that policies are being followed on an annual basis.

9. Reviewing the qualifications of all employees to ensure protected class individuals are given full opportunities for transfers and promotions, even to the extent of career counseling where appropriate.

10. Continually auditing to ensure that the University is in compliance in areas such as:
    a. Posters properly displayed.
    b. All facilities desegregated both in policy and in use.
    c. Protected class employees afforded a full opportunity and encouraged to participate in all University sponsored education, training, recreational, and social activities.

11. Notifying supervisors that their work performance is being evaluated annually on the basis of their equal employment opportunity efforts and results, as well as other criteria. Department heads must assist the Equal Opportunity Officer to identify problem areas, and ensure that their managers and supervisors are taking action to prevent harassment of employees placed through affirmative action.
**Selection, Recruitment, and other Personnel Procedures**

**Recruitment/Hiring Process**

Appropriate approvals from the responsible hiring and administrative personnel are required before initiating a hire.

All search committee makeup must be diverse. All employees on search committees must complete certification training in order to be eligible to participate on a search committee. Committee members review recruiting procedures to ensure equal opportunity in hiring practices. Committees are reviewed by Institutional Equity for diversity.

Job descriptions are reviewed and revised, if necessary, prior to posting to make sure education, experience, skills, etc. are consistent with requirements of the job. All advertisements must contain the EEO statement – “Michigan Technological University is an Equal Opportunity Educational Institution/Equal Opportunity Employer, which includes providing equal opportunity for protected veterans and individuals with disabilities.”

Positions are posted in Tech Today, Keweenaw Bay Indian Tribal Council and the Local Job Service Office. MTU will place job opportunity announcements on its website, local newspapers, journals, etc. when appropriate. EEO language is included in all employment advertisements.

The University will continue to provide information regarding job openings to the public, including protected class members. Females and minorities will be considered for all positions for which they are qualified.

Institutional Equity reviews/monitors the hire process to ensure there are no discriminatory actions. All applicants must have a reason for non-selection.

Interview questions must be asked consistently and approved by Human Resources.

All supervisors will continue to be made aware of the affirmative action and equal employment opportunity guidelines and the need for identification of promotable females and minorities.

Michigan Tech uses an online recruitment application system (PeopleAdmin). This allows the tracking of advertising sources and voluntary self-disclosure.

The Partner Engagement Program was created to help faculty spouses/partners gain knowledge about career opportunities at Michigan Tech.

Michigan Tech has an Early Preview of job postings (48 hour hold). All non-union positions will be posted to the internal 48 hour hold for specified groups (Veterans, Partner Engagement, Layoff pool) prior to regular posting.

MTU will continue to providing part-time employment to students and to provide part-time and temporary work to local work force.
**Job Advancement**

All employees are given an opportunity for promotion and transfer.

All decisions regarding promotions, transfers, layoffs, and recalls are made without regard to race, religion, color, national origin, age, sex, sexual orientation, gender identity, height, weight, veteran status, marital status, and disability status.

Promotions and lateral transfers within the bargaining unit are made following contract specifications.

Contract provisions apply when bargaining unit employees are laid off. Temporary, probationary and seniority employees are laid off in that order provided seniority employees have current ability to satisfactorily perform the work. Employees displaced or laid off shall be recalled to their former position or lower pay grade, in the order of their seniority provided they have the ability to do the work.

**Professional Development**

Professional Development programs are offered by Michigan Technological University for different specific classes of employees, e.g. management programs, professional development for faculty. Training involves special institutes, seminars, business courses, etc. Department heads may send their employees to specialized training sessions and seminars on or off campus.

The University will continue and expand training programs to encourage all employees, especially minorities and females, to upgrade and qualify for promotion opportunities.

Various types of training are available to employees through or with the support of the University.

The University sponsors different programs of in-house training. Supervisors and managers have attended training programs to increase self-awareness and to improve supervisory skills. The University has brought in consultants under contract to provide training programs to deal with identified areas. The University has supported programs sponsored by campus groups for training employee groups, such as assertiveness training, Total Quality Education, and Customer Service for non-exempt personnel. The Michigan Tech UAW Certification Program has been a collaborative effort among President Glenn Mroz, the UAW University Negotiation team, UAW leadership, Michigan Tech Human Resources, and Gogebic Community College to provide professional development for UAW staff.

The University pays costs for outside training programs, which the employee attends at the request of the University. These programs are usually held out of town and involve registration, travel, and lodging costs.

Both exempt and non-exempt employees are also eligible to take University courses, generally without charge, pursuant to the Employee Education Program.
Observations of University Sponsored Social and Recreational Activities

Social and recreational activities are open to all employees and are attended by all interested employees, including females and minorities.

Support of Community Action Agencies

Key university employees sit on the public boards, councils, various church boards, crisis center coalitions and many employees are involved in other local, state, and national civic affairs. Community members are invited to participate on Michigan Tech committees.

Within the confines of its position as a public institution, the University renders assistance and support for local, state, and national action agencies. There is a reduced tuition rate for senior citizens. The Division of Education and Public Services assists in providing programs for young and old of the community.

Internal Audit and Reporting Systems

The University's Audit and Reporting System has been designed to:

1. Measure the effectiveness of the program.
2. Indicate those areas where remedial action is needed.
3. Determine the degree to which the facility's goals and objectives have been obtained.

Design and implementation of internal audit and reporting systems to measure effectiveness of the total program is evidenced through the following:

1. Identification of race, sex, veteran, disability of all applicants, hires, and candidates for promotion/transfer and termination/lay-off/recall is provided by activity logs reflecting at least the following:
   a. Applicant Flow Log: name, race, sex, veteran, disability, employment applied for, job group, EEO-6 category, whether interviewed and date of job posting, and disposition;
   b. Hire Log: name, race, sex, veteran, disability, date of hire, department hired into, position hired for, job group, EEO-6 category, and rate of pay at time of hire;
   c. Promotion/Transfer Log: name, race, sex, veteran, disability, date of promotion/transfer, old department, position promoted/transferred from, job group, EEO-6 category of old job, rate of pay of old job, new department, position promoted/transferred to, job group, EEO-6 category and new rate of pay;
   d. Termination/Lay-Off/Recall Log: name, race, sex, veteran, disability, date of hire, date of termination/lay-off/recall, department terminated/laid-off from, position recalled to, job group, EEO-6 category and reason for termination.

2. The Office of Institutional Equity summarizes all of the personnel activities such as: applicant flow, hires, promotions to/within, transfers from, terminations/lay-off/recalls by job group indicating total, total males, and total females, and total minority males and total minority females by each minority group.

3. The Office of Institutional Equity performs an analysis that will measure, by job group, the success rates of minorities and females and compare them to the success rates of non-minorities and males. Where applicable the 80% rule is
applied. Any minority and/or female success rates which do not compare favorably to the success rates of non-minorities and males are assessed to determine the reason(s) and steps are taken to eliminate any criteria in the recruitment, selection, and placement functions which inappropriately and/or adversely affects one group more than the other.

4. A progress report is generated which indicates, by job group, at least the goal established, total actual placements (hires and promotions to) and total minority and female placements for the prior AAP period year and current AAP period year to date. Progress or lack thereof is analyzed and addressed at least semi-annually for internal purposes. Where there is lack of progress, all good faith efforts are explained.

Results of the analysis and potential problems are carefully reviewed and any necessary remedies are addressed.

5. The entire progress report is submitted to the President with remedies to solve problems or potential problems. The President is ultimately responsible to correct the problems. We conclude that our system complies with the internal audit and reporting requirements.

**Compliance with the Sex Discrimination Guidelines**

The University does not specify sex in hiring for any jobs. Advertising does not indicate a sex preference.

University policy expressly states that there shall be no discrimination because of sex, sexual orientation or gender identity.

All employees have an equal opportunity to perform any job they are qualified to perform. There is no distinction based upon sex in employment opportunities, wages, hours, or any other condition of employment. All fringe benefits are equal for men and for women.

There is no distinction made between married and unmarried persons of one sex while not making such a distinction for the other sex.

The University does not distinguish between a parent of young children for one sex and not for the other sex.

Appropriate and comparable physical facilities are provided for both sexes.

The University does not discriminate on the basis of pregnancy, childbirth, or related medical conditions. The University follows the Family and Medical Leave Act of 1993 (FMLA). The FMLA provides eligible employees up to 12 weeks of unpaid job protected leave in a 12 month period with continuation of group health insurance for a specified family event or qualifying exigency. The University has a Parental Leave Benefit to give parents additional flexibility and time to bond with their new child, adjust to their new family situation, and balance their professional and home obligations.

There are no different retirement ages for males and females.

The University’s wage schedules are not based upon or related to the sex of the employee in any way.

Neither females nor males are restricted to specific job classifications. There are no areas that may be considered "female" or "male" jobs.
There are no regular, standardized management training programs at the University. However, supervisory training programs have been presented and employees are frequently sent to seminars and training sessions. Females are equally eligible for these seminars and training sessions.

Availability of this Document

The full affirmative action program shall be available to any employee or applicant for employment for inspection upon request. Contact the Equal Opportunity Officer, Beth Lunde-Stockero Room 308 Administration Building, 487-3310, email equity@mtu.edu. The written AAP is also posted on Institutional Equity’s website: http://www.mtu.edu/equity/equal-opportunity/resources/aaprog.pdf.
Protected Veterans and Individuals with Disabilities

Definitions: Veterans

Michigan Technological University is a Government contractor subject to the Vietnam Era Veterans’ Readjustment Assistance Act of 1974, as amended by the jobs for Veterans Act of 2002, 38 U.S.C. 4212 (VEVRAA), and its implementing regulations (41 CFR Part 60-300), which requires Government contractors to take affirmative action to employ and advance in employment: (1) disabled veterans; (2) recently separated veterans; (3) active duty wartime or campaign badge veterans; and (4) Armed Forces service medal veterans. These classifications are defined as follows:

A “disabled veteran” is one of the following:

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

A “recently separated veteran” means any veteran during the three-year period beginning on the date of such veteran’s discharge or release from active duty in the U.S. military, ground, naval, or air service.

An “active duty wartime or campaign badge veteran” means a veteran who served on active duty in the U.S. military, ground, naval or air service during a war, or in a campaign or expedition for which a campaign badge has been authorized under the laws administered by the Department of Defense.

An “Armed forces service medal veteran” means a veteran who, while serving on active duty in the U.S. military, ground, naval or air service, participated in a United States military operation for which an Armed Forces service medal was awarded pursuant to Executive Order 12985.

Definitions: Individuals with Disabilities

"Individual with Disability" means a person who, generally, (i) has a physical or mental impairment that substantially limits one or more of his or her major life activities, (ii) has a record of such impairment, or (iii) is regarded as having such an impairment.

For the purposes of this Plan, an individual with a disability is "substantially limited" if he or she is unable to perform a major life activity that the average person in the general population can perform, or is significantly restricted as to the condition, manner, or duration under which a person can perform a particular major life activity as compared to the condition, manner, or duration under which the average person could perform that same activity.

"A Qualified Individual with Disability" means an individual with a disability as defined above who meets the requisite skill, experience, education, and other job related requirements for a particular job and is capable of performing that job, with or without a reasonable accommodation for his or her disability.
Equal Opportunity Clause

Michigan Technological University will assure compliance with the equal opportunity clause in each of its covered government contracts:

EQUAL OPPORTUNITY FOR VEVRAA PROTECTED VETERANS

Michigan Technological University will not discriminate against any employee or applicant for employment because he or she is a protected veteran in regard to any position for which the employee or applicant for employment is qualified. Michigan Technological University agrees to take affirmative action to employ, advance in employment and otherwise treat qualified veterans without discrimination based upon their disability or veterans' status in all employment practices, including but not limited to the following: employment, upgrading, demotion, transfer, recruitment advertising, layoff, termination, rates of pay or other forms of compensation, and selection for training.

Michigan Technological University will list all jobs with Michigan Works, except for management and all top-level positions, subject to exclusions authorized by law. Michigan Technological University further agrees to provide reports to the Michigan Works regarding employment openings and hires as may be required.

Listing of employment openings with Michigan Works shall be made concurrently with the use of any other recruitment source or effort and shall involve the normal obligations which attach to the placing of a bona fide job order, including the acceptance of referrals of veterans and non-veterans. The listing of employment openings does not require the hiring of any particular job applicants, and nothing herein is intended to relieve the University of any requirement in Executive Orders or regulations regarding nondiscrimination in employment.

Michigan Technological University agrees to post in conspicuous places, available to employees and applicants for employment, notices in a form to be prescribed by the Director, provided by or through the contracting officer. Such notice shall state the contractor's obligations under the law to take affirmative action to employ and advance in employment qualified veterans for employment, and the rights of applicants and employees.

Michigan Technological University will notify each labor union or representative of workers with which it has a collective bargaining agreement or other contractual understanding that it is bound by the terms of the pursuant to the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended, and is committed to take affirmative action to employ and advance in employment qualified veterans.

Michigan Technological University will include the provisions of this clause in every subcontract or purchase order of $150,000 or more unless exempted by the rules, regulations, or orders of the Secretary issued pursuant to the Act, so that such provisions will be binding on each subcontractor or vendor. The University will take such action with respect to any subcontract or purchase order as the Director of the Office of Federal Contract Compliance Programs may direct to enforce such provisions, including action for noncompliance.

All solicitations or advertisements for MTU placed by or on behalf of MTU, state "Michigan Technological University is an Equal Opportunity Educational Institution/Equal Opportunity Employer, which includes providing equal opportunity for protected veterans and individuals with disabilities".
Equal Opportunity Clause

Michigan Technological University will assure compliance with the equal opportunity clause in each of its covered government contracts:

EQUAL OPPORTUNITY FOR INDIVIDUALS WITH DISABILITIES

The contractor will not discriminate against any employee or applicant for employment because of physical or mental disability in regard to any position for which the employee or applicant for employment is qualified. The contractor agrees to take affirmative action to employ, advance in employment and otherwise treat qualified individuals with disabilities without discrimination based upon their physical or mental disability in all employment practices such as the following: employment, promotion, demotion or transfer, recruitment advertising, layoff or termination, rates of pay or other forms of compensation, and selection for training.

The contractor agrees to comply with the rules, regulations, and relevant orders of the Secretary of Labor issued pursuant to the Act.

In the event of the contractor’s noncompliance with the requirements of this clause, actions for noncompliance may be taken in accordance with the rules, regulations and relevant orders of the Secretary of Labor issued pursuant to the Act.

The contractor agrees to post in conspicuous places, available to employees and applicants for employment, notices in a form to be prescribed by the Director, provided by or through the contracting officer. Such notices shall state the contractor’s obligation under the law to take affirmative action to employ and advance in employment qualified individuals with disabilities and the rights of applicants and employees.

The contractor will notify each labor union or representative of workers with which it has a collective bargaining agreement or other contract understanding, that the contractor is bound by the terms of Section 503 of the Rehabilitation Act of 1973, and is committed to take affirmative action to employ and advance in employment individuals with physical or mental disabilities.

Michigan Technological University will incorporate this clause in every subcontract or purchase order of $15,000 or more unless exempted by rules, regulations, or orders of the Secretary issued pursuant to Section 503 of the Act, so that such provisions will be binding upon each subcontractor or vendor. The contractor will take such action with respect to any subcontract or purchase order as the Director of the Office of Federal Contract Compliance Programs may direct to enforce such provisions, including action for noncompliance.

All solicitations or advertisements for MTU placed by or on behalf of MTU, state “Michigan Technological University is an Equal Opportunity Educational Institution/Equal Opportunity Employer, which includes providing equal opportunity for protected veterans and individuals with disabilities”.

12
Applicability of the Affirmative Action Program Requirement

The Affirmative Action Program for Veterans and Individuals with Disabilities will be reviewed and updated annually. If there are any significant changes in procedures, rights or benefits as a result of the annual updating, such changes will be communicated to employees as determined by Michigan Technological University.

Availability of this Document

The affirmative action program shall be available to any employee or applicant for employment for inspection upon request. Contact the Equal Opportunity Officer, Beth Lunde-Stockero, Room 308 Administration Building, 487-3310, email equity@mtu.edu. The written AAP is also posted on Institutional Equity’s website: http://www.mtu.edu/equity/equal-opportunity/resources/aaprog.pdf.

Invitation to Self-Identify

(a) Pre-offer. As part of Michigan Tech’s affirmative action obligation, the University invites applicants for employment to state whether the applicant believes they are an individual with a Disability and/or a Protected Veteran.

(b) Post-offer. In addition to the invitation in paragraph (a), Michigan Tech again offers the applicant an opportunity to state whether the individual believes they are an individual with a Disability and/or a Protected Veteran after the offer of employment but before the applicant begins their job duties.

- Additionally, Institutional Equity surveys the campus every two years.
- Employees can self-identify at any time through BANWEB or by filling out the self-disclosure form on the IEI website: http://www.mtu.edu/equity/equal-opportunity/resources/post-hire-eo-form.pdf

All information on self-identification is kept confidential.
Policy of Michigan Technological University

It is the policy of Michigan Technological University to take affirmative action to employ and advance qualified veterans and individuals with disabilities. The University has always utilized procedures to ensure that all phases of its employment policies are consistent with equal opportunity statutes and regulations. The University reasserts its policy to take affirmative action to employ and advance qualified veterans and individuals with disabilities. The policy shall apply in all employment practices, including but not limited to hiring, promotion, demotion, transfer, recruitment advertising, layoff, termination, rate of pay or other forms of compensation, and training.

Michigan Technological University is committed to equal opportunity employment and will ensure, through institutional mechanisms, that veterans and individuals with disabilities are given every opportunity for equal employment.

Discrimination or Harassment of any individual on the basis of disability or protected veteran status is prohibited.

Michigan Technological University will post a policy statement on the University’s website. This requirement shall be satisfied by the posting of the "Invitation to Veterans and Individuals with Disabilities" who believe themselves covered by the Disabled Veterans and Veterans of the Vietnam Era Readjustment Assistance Act of 1974 and Jobs for Veterans Act, and Individuals with Disabilities. All information given pursuant to this invitation shall be kept confidential. If employees identify themselves, management will seek the advice of the employee regarding proper placement and appropriate accommodation. Nothing in the above invitation or other sections of the affirmative action program precludes an employee from informing the University at any future time of a desire to benefit under the program.
Review of Personnel Process

Michigan Technological University will take affirmative action to employ and advance in employment the best qualified veterans and individuals with disabilities at all levels of employment for which they are qualified, including the executive level. Such action shall apply to all employment practices, including, but not limited to: hiring, promotion, demotion, transfer, recruitment or recruitment advertising, layoff or termination, rates of pay and other forms of compensation, and selection for training.

Michigan Tech shall review the personnel processes to determine whether their present procedures assure careful, thorough and systematic consideration of the job qualifications of known veterans and individuals with disabilities for job vacancies filled either by hiring or promotion, and for all training opportunities offered or available.

In determining the qualifications of a covered veteran, the contractor shall consider only that portion of the military record, including discharge papers, relevant to the specific job qualifications for which the veteran is being considered. To the extent that it is necessary to modify their personnel procedures, contractors shall include the development of new procedures for this purpose in their affirmative action program required under this part.

Ensures that its personnel processes do not stereotype qualified individuals with disabilities or protected veterans in a manner which limits their access to jobs for which they are qualified.

Ensures that all applicants and employees have equal access to its personnel processes.

Will provide necessary reasonable accommodation to ensure applicants and employees with disabilities receive equal opportunity in the operation of personnel processes.

Shall periodically review such processes and make any necessary modifications to ensure that these obligations are carried out.

The University's compensation program will be administered equitably with respect to all veterans and individuals with disabilities. It will not reduce the amount of compensation offered because of any disability income, pensions, or other benefits the applicant or employee receives from another source.
**Physical and Mental Qualifications**

Personnel responsible for hiring and placement or training have the responsibility to familiarize themselves with all physical and mental job qualification requirements to ensure that these requirements do not tend to screen out qualified disabled veterans and individuals with disabilities.

Job qualification requirements should be related to the specific job or jobs for which the individual is being considered and shall be consistent with business necessity and the safe performance of the job. The qualifications will be reviewed whenever a position is posted.

Information gathered on medical questionnaires or physical examinations shall be kept confidential except that:

1. Supervisors and managers may be informed regarding restrictions on the work or duties of disabled veterans, accommodations, or the presence of a communicable disease.
2. First aid and safety personnel may be informed if the condition might require emergency treatment.
3. Government officials investigating compliance with the Act will be informed.

**Reasonable accommodation to Physical and Mental Limitations**

Michigan Technological University will make reasonable accommodations for the physical and mental limitations of employees and applicants unless it is demonstrated that such accommodation would impose an undue hardship on the business of the University.

Information on the accommodation process for faculty/staff/visitors is available on the Institutional Equity & Inclusion website. Information on the student process is available on the Student Disability Services website.

Data will be maintained listing employees who have been hired and the accommodations undertaken to enable employees, including disabled veterans and individuals with disabilities, to perform the job.

All applicants and employees are invited to voluntarily disclose veteran and disability status at the pre-offer and post-offer stage using the form prescribed by OFCCP. Employees are invited to self-identify at any time using BANWEB.

**Harassment**

We have developed and implemented procedures to ensure that all employees and applicants are not harassed because of their status as a protected veteran or individual with disabilities.

Retaliation against anyone who is a victim, files a claim/complaint, who is named as a respondent, or who participates in the investigation and/or resolution of a case, regardless of the outcome of the case, is expressly prohibited and could lead to discipline and possible dismissal.
External Dissemination of the Policy, Outreach, and Positive Recruitment

Michigan Technological University will continue to review its employment practices to determine whether its personnel programs provide the required affirmative action for employment and advancement of qualified veterans and qualified individuals with disabilities.

Michigan Tech will send written notification of company policy to subcontractors, vendors and suppliers.

Examples of Outreach and recruitment activities

The University has notified the Michigan Works of its desire to provide meaningful employment opportunities to qualified veterans and IWD. Position announcements are sent to local and regional referral agencies, many of whom serve individuals with disabilities and veterans as well as female and minority constituents.

Michigan Tech has contact with Houghton-Keweenaw County Department of Veteran’s Affairs.

Michigan Tech has contact with the Michigan Works representative for Houghton County. Jobs posted at Michigan Works are put on hold to provide veteran priority referral.

MTU (Rob Bishop) has contact with the Escanaba Vet Center – serving the Upper Peninsula.

MTU (Rob Bishop) – is a representative for Michigan Tech at the Western U.P. Veterans Community Action Team (VCAT).

Michigan Tech Veteran Advisory Group. The Veterans Advisory Group, is a volunteer committee of faculty/staff who are either veterans themselves and/or serve in a capacity at the University that provides resources and support to veterans who are students and/or employees.

Michigan Tech Student Veteran Organization - Fellowship and camaraderie among former service members of all branches of the military. Club will promote patriotic activities and support veterans transitioning from military service to academic pursuits.

Student Training and Academic Recruitment Program (STAR): The STAR program is an innovative program in which students are hired as part-time on-campus representatives to promote DOD as the "Employer of Choice". Through peer-to-peer interaction, STAR students market DOD's various and diverse employment and scholarship opportunities. RAD manages the STAR program, and encourages DOD Components to hire full-time students majoring in academic studies matching DOD's mission critical skills. Michigan Tech has a STAR representative on campus.

Michigan Tech has an Americans with Disabilities Act (ADA) Committee. The ADA Committee advises the Director of Institutional Equity and Inclusion regarding accommodations and considerations.

Michigan Tech is a member of the Association on Higher Education and Disability (AHEAD), which provides many resources for accessibility for higher ed. issues. Members of our campus, from the Dean of Students to Writing Center coaches, have regularly attended the annual AHEAD conferences each summer.

Student Disability Services is dedicated to assuring and enhancing opportunities for students with disabilities. If a student has a documented disability, they may request appropriate modifications, accommodations, or auxiliary aids that will enable them to participate in and benefit from educational programs and activities.
The ADA/504 Coordinator in IEI is the point person for intake from employees seeking accommodations, collecting the documentation and purchasing the equipment from the ADA fund.

All students have the opportunity to participate in work-study programs or as an intern.

Individuals with disabilities and veterans have the opportunity to participate in career days, and all programs, and related activities.

MTU participates in the Workforce Recruitment Program (WRP). The Workforce Recruitment Program (WRP) is a recruitment and referral program that connects federal sector employers nationwide with highly motivated college students and recent graduates with disabilities who are eager to prove their abilities in the workplace through summer or permanent jobs. In 2016, MTU was the only UP school participating in this program. Six MTU students have their resumes posted nationally.

MTU has regular contact with Michigan Works.

MTU will place job opportunity announcements on its website, local newspapers, journals, etc when appropriate. Veterans and Individuals with Disabilities will be considered for all positions for which they are qualified.

Michigan Tech has an early preview of job postings for veteran employees (48 hour hold).

MTU will continue to providing part-time employment to students.

MTU will continue to provide part-time and temporary work to local workforce.

The University will continue to provide information regarding job openings to the public, including protected class members.

Student Veteran Career Fair - MTU students were invited to a nationwide virtual career fair. This information was posted on the Career Services website.

When placing an ad, all advertisements will include the EEO solicitation "Michigan Technological University is an Equal Opportunity Educational Institution/Equal Opportunity Employer, which includes providing equal opportunity for protected veterans and individuals with disabilities."

The University makes an active, ongoing effort to inform employees, applicants, and members of the public of its equal opportunity policies.

Stationery and publications of the University include the statement that “Michigan Technological University is an equal opportunity educational institution/equal opportunity employer, which includes providing equal opportunity for protected veterans and individuals with disabilities.”

Job descriptions are reviewed and revised, if necessary, prior to posting to make sure education, experience, skills, etc. are consistent with requirements of the job.

Every two years there is a campus wide survey to identify faculty and staff with disabilities and U.S. Veterans. The last survey was March 2017.
We are striving to make the campus more accessible to students and employees with physical impairments. There are now automatic doors on many of the campus buildings with more to be installed. Due to our location, weather is an extreme hindrance to those in wheelchairs or motorized chairs. We are always continuing to work on accommodations for those with such challenges. Location and signage continues to be a problem for parking and automatic doors and this challenge is an ongoing one which is constantly being addressed.

The William G. Jackson Center for Teaching and Learning has a testing center that offers a quiet place for students with accommodations to take exams.

Barrier Report - Michigan Tech has an online Barrier Report for reporting barriers such as an inoperative elevator, blocked access ramps, water or ice accumulations, or inappropriate use of designated accessible parking space, etc.

Social and recreational activities are open to all employees and are attended by all interested employees, including females, minorities, veterans and individuals with disabilities.

Veterans Day tributes are held annually.

Anthony Castelli Attorney’s Veteran’s College Scholarship. This is an annual scholarship awarded to a current military veteran or honorably discharged veteran or parent, sibling, child or grandchild of a current or honorably discharged veteran.

Gold Level Veteran Friendly School – In 2016, Michigan Tech was honored as a gold-level Veteran-Friendly School.
Internal Dissemination of the Policy

Michigan Technological University’s policy on equal opportunity is printed in the Board of Trustees Policy Manual. The policy is available to all employees through its publication on the University’s web site.

The union contract covering the bargaining unit employees contains a statement recognizing the equal employment opportunity/affirmative action commitment of the University.

Has developed internal communication to engage in affirmative action efforts to employ qualified veterans and qualified individuals with disabilities to foster understanding, acceptance, and support among the facility’s management, supervisory and all other employees.

Management and supervisory personnel will be advised of the policy.

The policy is available to all employees through its publication on the University’s web site.

The daily publication, Tech Today, contains the same statement in the job opening section throughout the year.

All new employees are given notice of the Equal Employment, Prohibition of Discrimination or Harassment, and Discrimination Based on Sex Policy during orientation.

The EEO policy is communicated to managers and supervisors by means of face-to-face counseling as needed and by means of group meetings.

Stationery and publications of the University include the statement that Michigan Technological University is an equal opportunity educational institution/equal opportunity employer, which includes providing equal opportunity for protected veterans and individuals with disabilities.

The University indicates that it is an EEO employer in all newspaper and digital advertisements and required EEO signs are posted on appropriate bulletin boards and on the University’s web site.

Articles of accomplishments of all employees will be recognized in University publications.

EEO posters are displayed in accessible areas on campuses throughout the University and on the University’s web site. Posters include “EEO is the Law” which identifies nondiscrimination laws covering veterans and persons with disabilities.

The University website indicates “Michigan Technological University is an Equal Opportunity Educational Institution/Equal Opportunity Employer, which includes providing equal opportunity for protected veterans and individuals with disabilities”.
Audit and reporting systems

The following personnel activities are reviewed to ensure non-discrimination and equal employment opportunity for all individuals without regard to veteran or disability status.

- Recruitment, advertising, and job application procedures
- Implementation of employment practices such as: hiring, promotion, tenure, and layoff
- Rates of pay or other compensation
- Job assignments, classifications, descriptions
- Implementation of reasonable accommodation procedures and policies
- Awarding sick leave, leaves of absence and other leave policies
- Any other term, condition or privilege of employment

Responsibility for Implementation

Overall responsibility for affirmative action has been assigned to the Equal Opportunity Officer.

1. Development of policy statements, personnel policies and procedures, internal and external communication of the policy, and monitoring the effectiveness of these actions.

2. Assuring that management is aware:
   a. of its responsibility to make reasonable efforts to provide a work environment free of bias and to prevent harassment of protected veterans and individuals with disabilities.
   b. that the manager’s performance is being evaluated on the basis of affirmative action, as well as other criteria.

3. Assist supervisors and other employees in the identification of problem areas, formulate solutions, and establish departmental goals and objectives.

4. As authorized, assist the University in its dealings with enforcement agencies.

5. Serve as liaison between the University and organizations concerned with and involved in employment opportunities for individuals with disabilities and protected veterans.

6. Keep management informed on current developments in the employment of the individuals with disabilities and protected veterans.

7. Regularly communicate with supervisors and employees to assure that the University's policies are being followed.

8. Review the affirmative action efforts in hiring to assure that individuals with disabilities and protected veterans are given full opportunity for transfers and promotions.
Training

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

The University trains all personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes to ensure that the commitments in the University's AAP are implemented.

All staff who participate on search committees must complete staff certification training. Staff Search Committee Certification consists of two parts:

- Part One: “Recruiting and Hiring” Training Session – This training covers each area of the staff hiring process, provides direction for effective interviewing, and delivers other resources to support recruitment and hiring.
- Part Two: “Best Practices of Staff Hiring (Legal Aspects)” Online Course – This online course was designed by the Office of Institutional Equity. It consists of an audio/PowerPoint presentation, hiring scenarios, and a brief survey. This course is made available to those who complete Part One.

All faculty who participate on search committees must complete Diversity Certification training.

All new employees are given notice of the Equal Employment, Prohibition of Discrimination or Harassment, and Discrimination Based on Sex Policy during orientation.

Awareness and training - In an effort to reduce the risk of gender discrimination, and sexual misconduct such as sexual harassment and sexual violence, including the crimes of rape, sexual assault, stalking, dating violence, and domestic violence occurring among students and employees, Michigan Tech utilizes a range of campaigns, strategies, and initiatives to promote awareness, education, risk reduction, and prevention programming and training.

- All employees must complete Anti-Harassment, Discrimination, Retaliation training.
- Is required for all incoming new first year students, transfer students and incoming graduate students. The training is assigned during new student orientation and throughout an incoming student’s first semester.

Benchmarks for hiring

Michigan Tech has chosen to adopt OFCCP’s current 6.7% hiring benchmark goal for Protected Veterans as opposed to calculating our own percentage goal.

Utilization goals

OFCCP has established a utilization goal of 7% for employment of qualified Individuals with Disabilities for each job group.
AFFIRMATIVE ACTION INVITATION TO VETERANS

It is the policy of Michigan Technological University, an employer and government contractor subject to Section 38-USC 4212 of the Vietnam Era Veterans Readjustment Assistance Act of 1974 and the Jobs for Veterans Act to take affirmative action to employ and advance in employment, qualified veterans. This action applies to all employment practices, i.e., hiring, promotion, demotion or transfer, recruitment advertising, layoff or termination, rates of pay and benefits.

If you are a veteran covered by this program and would like to be considered under this affirmative action plan, please tell us. This information is voluntary. Information obtained shall be kept confidential, except that (1) the hiring supervisor may be informed to assure consideration for employment under this plan, (2) supervisors and managers may be informed regarding restrictions on work or duties of disabled veterans and regarding necessary accommodations, (3) first aid personnel may be informed, when and to the extent appropriate, if the condition might require emergency treatment, and (4) government officials investigating compliance with the act shall be informed.

In order to assure proper placement of all employees, we do request that you answer the following question: If you have a disability which might affect your performance or create a hazard to yourself or others in connection with the job for which you are applying, please state the following: (1) The skills and procedures you use or intend to use to perform the job notwithstanding the disability, and (2) the accommodations we could make which would enable you to perform the job properly and safely, including special equipment, changes in the physical layout of the job, elimination of certain duties relating to the job or other accommodation.

The Affirmative Action program for Michigan Technological University is available for inspection by all employees or applicant by appointment, during normal working hours. The University has developed an internal procedure to consider complaints of veterans covered by this plan. Persons who believe they have been discriminated against because of veteran’s status, or who wish to inspect the Affirmative Action Plan should contact the Equal Opportunity Officer, Beth Lunde-Stockero, Room 308 Administration Building, 487-3310, email equity@mtu.edu.
Affirmative Action Invitation to Individuals with Disabilities

Michigan Technological University has developed an affirmative action plan for Individuals with Disabilities. It is available for inspection during normal business hours by making an appointment with the Equal Opportunity Officer, Room 308 Administration Building, 487-3310, email equity@mtu.edu.

If you receive a request for an accommodation, need a reasonable accommodation, or have questions contact the ADA Coordinator or a member of the ADA Committee. Submission of this information is voluntary and refusal to provide it will not subject you to discharge or disciplinary treatment. Information obtained concerning individuals shall be kept confidential, except that (1) the hiring supervisor may be informed to assure consideration for employment under this plan, (2) supervisors and managers may be informed regarding restrictions on work or duties of Individuals with Disabilities and regarding necessary accommodations, (3) first aid and safety personnel may be informed, when and to the extent appropriate, if the condition might require emergency treatment, and (4) government officials investigating compliance with the Act shall be informed.

If you are an Individual with a Disability, the University would like to include you under the affirmative action program. It would be helpful if you describe (1) any special methods, skills and procedures which qualify you for positions that you might not otherwise be able to do because of your disability, so that you will be considered for any position of that kind, and (2) the reasonable accommodations which could be made to enable you to perform the job properly and safely, including special equipment, changes in the physical layout of the job, elimination of certain duties relating to the job, or other accommodations.

Michigan Technological University has developed an internal grievance procedure to consider complaints of Individuals with Disabilities. Persons who believe they have been discriminated against because of a disability should contact the Equal Opportunity Officer, Room 308 Administration Building, 487-3310, email equity@mtu.edu, who will investigate the complaint and provide a prompt response.
Religion and National Origin

Equal Opportunity Clause

Michigan Technological University affirms that there is no discrimination against employees or applicants for employment because of religion or national origin and that employees are treated fairly during employment, without regard to their religion or national origin. Such action includes, but is not limited to: employment, upgrading, demotion, transfer, recruitment, recruitment advertising, layoff, termination, rates of pay or other compensation, and selection for training.

We make every effort to maintain ongoing communication with all of our personnel regarding the University's commitment to equal employment opportunities regardless of religion or national origin.

Reasonable accommodations to the religious observances and practices of employees or prospective employees will be made, unless doing so would result in undue hardship. In determining whether undue hardship exists, factors such as the cost to the University and the impact on the rights of other employees would be considered.