

Gonzaga University

502 E. Boone Avenue
Spokane, WA 99258

AFFIRMATIVE ACTION PLAN FOR VETERANS of the UNITED STATES MILITARY

In fulfillment of obligations under the Vietnam Era Veterans Readjustment Assistance Act of 1974, as amended by the Veterans Employment Opportunities Act of 1998, the Veterans Benefits and Health Care Improvement Act of 2000, and the Jobs for Veterans Act of 2002, and 41CFR Parts 60-250 and 60-300, and 41CFR Parts 60-300 (and 60-250 if applicable) as revised effective March 24, 2014.

Establishing Plan for the Period:

From: 9/1/2015 To: 8/31/2016

Employer Federal Tax ID and EEO-1 ID Number: 91-0236600

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8-17-2015

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August 19, 2015

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AFFIRMATIVE ACTION FOR VETERANS

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Reaffirmation of our Commitment to Equal Opportunity

To: All Faculty, Staff, Job Applicants, Supervisors and Officials
Subject: Affirmative Action - Equal Employment Opportunity for Military Veterans

Gonzaga University, its leadership, staff and faculty must be fully committed to utilizing all human resources, including veterans of U.S. military service, to their fullest potential and to achieving the goal of equal employment opportunity under the federal Vietnam Era Veterans Readjustment Assistance Act, as amended. This includes removing any employment barriers and reaching out to qualified veterans.

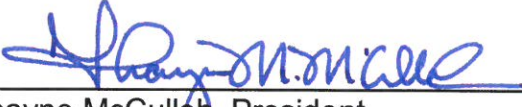
We prohibit discrimination against any qualified applicant, faculty, or staff based on his or her status as a veteran of the United States military. We have established an Affirmative Action plan for veterans:

1. with a service-connected disability, or
2. in the 3-year period beginning on the date of release from active duty, or
3. who served in a war, campaign or expedition for which a campaign badge has been authorized, or in an operation for which a U.S. Armed Forces service medal was awarded.

Our policy applies to all personnel actions including but not limited to recruitment, advertising, hiring, re-evaluation, promotion, discipline, transfer, layoff, leave or termination, rates of pay, other forms of compensation or benefits, training, apprenticeship, or participation in social or recreational activities. All such decisions will be based only on valid job requirements. Our Affirmative Action plan has the purpose of focusing our efforts to employ and advance in employment, qualified veterans including disabled veterans, and other protected veterans at all levels of employment.

If you believe you are a protected veteran, you are invited to inform our Affirmative Action Officer so that you may be included in required government reporting, or (for faculty and staff) go to zagweb.gonzaga.edu to update your status. No one shall be subjected to harassment, intimidation, threats, coercion, or discrimination because of filing a complaint under this policy, assisting in an investigation, opposing a practice prohibited by laws protective of veterans, or exercising any other rights under these laws or related amendments.

Christine Purviance, Assistant Director of Equity and Inclusion, is Gonzaga University's Affirmative Action Officer and has responsibility to maintain the necessary programs, records, and reports to ensure compliance and policy objectives. The full text of the policy may be reviewed on the Human Resource Equal Opportunity page of the Gonzaga University website.



Thayne McCulloh, President

August 19, 2015
Date

B. PURPOSE and DEFINITIONS

60-300.1, 2

The purpose of this plan is to assure that Gonzaga University will take affirmative action on behalf of the covered veterans defined below. Its further purpose is to prevent discrimination in accordance with 38 U.S.C. (4212), the Vietnam Era Veterans Readjustment Act of 1974 as amended, the Veterans Employment Opportunities Act of 1998 (VEOA), the Veterans Benefits and Health Care Improvement Act of 2000 (VBHCIA), and the Jobs for Veterans Act of 2002 (JVA).

Definitions of Covered Veterans (60-300.2):

Disabled Veteran - A veteran who (1) 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 (2) who was discharged or released from active duty because of a service-connected disability.

Qualified Disabled Veteran means a disabled veteran who has the ability to perform the essential functions of the employment position with or without reasonable accommodation(s).

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.

Other Protected Veteran means a person who served on active duty 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.

Armed Forces Service Medal Veteran means any veteran who, while serving on active duty in the Armed Forces, participated in a United States military operation for which an Armed Forces service medal was awarded pursuant to Executive Order 12985 (61 FR 1209).

Following 2002, the law no longer uses the term "Vietnam Era Veteran" because it is included in the new definitions above. However, we preserve the original definition here for informational purposes. "A person who served on active duty for a period of more than 180 days, and was discharged with other than a dishonorable discharge, if any part of such duty occurred in the Republic of Vietnam between February 28, 1961 and May 5, 1975; or between August 5, 1964 and May 7, 1975 in all other cases."

C. REVIEW of PROCESSES and CONSIDERATION of QUALIFICATIONS 60-300.44(b)

Records of all personnel actions with respect to known covered veterans, accommodations made, complaints or grievances, and action taken hereunder shall be maintained for at least two years. This shall include personnel file notations of each vacancy or promotion for which covered veterans are considered. Recruiting / selection files will be maintained with documentation identifying reasons behind selection choices. Such information will be discussed with the applicant or employee on request. All personnel processes will be reviewed at least annually to determine whether they assure careful, thorough and systematic consideration of the job qualifications of known veteran applicants, faculty, or staff for all job openings and training opportunities.

Records of training programs for which covered veterans were considered and those which were attended will also be kept. Where an accommodation to a disability is made to enable placement of a covered person, a file separate from the personnel file will contain a description, and such will be logged and reported annually.

D. PHYSICAL and MENTAL QUALIFICATIONS 60-300.44(c)

Any physical or mental job requirements will be reviewed at least annually to ensure that they do not tend to screen out qualified covered veterans unless they are validly related to the specific job for which the individual is being considered and are consistent with business necessity.

Physical and mental selection standards and medical examinations, if required, are applied only in accordance with business necessity, job safety and performance in a non-discriminatory fashion. Such exams, other than drug screenings, will not be required of applicants until after a contingent offer of employment. Information obtained from such exams will be kept confidential except on a need to know basis such as supervisors who may be informed regarding accommodations or work restrictions, safety personnel regarding conditions requiring emergency treatment, or government compliance officials.

E. AUDIT and REPORTING 60-300.44(h)

This affirmative action plan will be reviewed and updated annually by the Affirmative Action Officer. If this review produces significant changes in this plan, these changes will be communicated to employees and applicants in writing. All plan records, reports and personnel files will be available to government auditors upon request.

VETS4212 Report (previously known as VETS-100A) - An annual report to the Department of Labor, the VETS4212 Report, will be prepared and submitted as required.

We will design, implement and document annually an audit and reporting system that will:

1. Measure the effectiveness of our Affirmative Action Plan;
2. Indicate any need for remedial action;
3. Determine the degree to which our objectives have been attained;
4. Determine whether known protected veterans have had the opportunity to participate in all company sponsored educational, training, recreational and social activities;
5. Measure our compliance with specific AAP obligations, document actions taken related to above; and
6. Correct any deficiencies to bring our programs into compliance.

F. ANNUAL DATA COLLECTION

60-300.44(k)

As required, we will annually track and tally: 1) the number of applicants identifying as veteran, 2) the number of jobs opened and filled, 3) the number of applicants for all jobs, 4) the number of protected veteran hires, and 5) the number of all applicants. These records will be retained for at least three (3) years.

G. ANNUAL BENCHMARKS and PROGRESS MEASUREMENT 60-300.45

We will annually set a "hiring benchmark" for Veterans using either the percent of Veterans nationally as estimated by OFCCP (7.2%, for 2014-2015), or our own estimate taking into account: (i) the average percentage of veterans in the civilian labor force in the State(s) where we are located over the preceding three years, as calculated by the Bureau of Labor Statistics; (ii) the number of veterans, over the previous four quarters, who were participants in the employment service delivery system in the States where we are located, as published by the Veterans' Employment and Training Service; (iii) the applicant ratio and hiring ratio for the previous year, based on our data collected above; (iv) our recent assessment of the effectiveness of our external outreach and recruitment efforts; and (v) any other factors, including but not limited to the nature of our job openings and locations, which would tend to affect the availability of qualified protected veterans.

This "benchmark" and our actual progress against it will be included in our annual plan report and all related records will be retained for at least three (3) years.

H. ANNUAL WRITTEN ASSESSMENT of OUTREACH 60-300.44(f)3

We annually write a review of our outreach and recruitment efforts over the previous twelve months to evaluate their effectiveness in recruiting qualified protected veterans. This will include the criteria used to evaluate the effectiveness of each effort and our conclusion as to whether each effort was effective. Among these criteria shall be the data collected in section F above, our annual data collection, for the current year and the two most recent previous years. Records will be retained for three (3) years.

I. REASONABLE ACCOMMODATION 60-300.44(d)

Gonzaga University will make reasonable accommodation for otherwise qualified disabled veterans. Accommodations are reasonable only if they do not create undue hardship on the conduct of business when considering such factors as business necessity, costs and other objective factors. Where performance difficulties are observed and a disability is known, we'll ask, if appropriate, about a possible connection.

J. COMPENSATION 60-300.21(i)

Offers of employment or promotion to protected veterans shall not be reduced because of any disability or military pension income or benefits derived from another source. Benefits including, but not limited to vacation, holiday, leave of absence, or retirement will be provided without discrimination because of veteran status.

K. ANTI-HARASSMENT 60-300.44(e, f)

Gonzaga University has developed and implemented procedures to ensure that its faculty and staff are not harassed because of their status as a disabled veteran or other protected veteran.

L. EXTERNAL DISSEMINATION

60-300.44(f)

Gonzaga University will comply with the following requirements:

1. Applicant websites, if any, will include the veterans rights notice (poster) provided by the Secretary of Labor, and capture and store it with or as part of our e-application. (41 CFR60-300.05(49)0)
2. Recruiting ads shall state that "all qualified applicants will receive consideration for employment without regard to their protected veteran status." (41 CFR60-300.05(12))
3. The posted Reaffirmation Statement (see page 3) must include Braille versions or other accommodations to make it accessible. (41 CFR60-300.05,21, 41, 43, 44(a))
4. Send notice to all vendors, suppliers, including recruiting sources, and any unions to request cooperation and appropriate action.
5. Develop appropriate outreach and recruitment actions, such as:
 - a. Enlisting the help of state Veteran Employment Representatives, Dept. of Veterans Affairs, veteran's counselors on college campuses, or veteran service groups for both recruiting and technical assistance in workplace veterans issues;
 - b. Briefings and tours for veterans representatives as appropriate to our recruiting needs, including explanations of hiring process, current and future openings, job descriptions and referral methods;
 - c. Reaching out to veterans students in college/school recruiting, if any;
 - d. Including our veteran employees in any such outreach efforts;
 - e. Taking positive steps to attract veterans not currently in the workforce;
 - f. Using language on any employment brochures, advertisements, bulletin boards, and applications to inform veterans of this policy;
 - g. Reviewing personnel records to determine availability and promotability of known covered persons for each opening.

M. INTERNAL DISSEMINATION

60-300.44 (g)

1. This policy will be communicated to all faculty, staff, and supervisors through inclusion in the Gonzaga University Policies & Procedures Manual.
2. Supervisor meetings on EEO/Affirmative Action will include discussion of this policy.
3. New Employee Orientation and supervisory training programs will include this Affirmative Action plan.
4. All individuals involved in recruitment, screening, selection, discipline or any personnel decision shall be trained to ensure compliance with this plan.
5. Periodic articles or announcements will be posted in various newsletters and communications, which could include special features on accomplishments of individuals with disabilities.
6. The policy will be posted on the Human Resources Equal Opportunity page of the Gonzaga University website. Any significant changes resulting from updates shall be communicated to faculty, staff, and applicants.

N. CONTRACT and PURCHASE ORDER CLAUSES

41 CFR 60-300.5(a)

Our vendors, contractors and suppliers will be informed of our policy, and all purchase orders or contracts of \$100,000 annual value or more will contain in bold text the following clause:

41 CFR 60-300.5(a) requires all contracts and purchase orders to incorporate this language: "This contractor and subcontractor shall abide by the requirements of 41 CFR 60-300.5(a). This regulation prohibits discrimination against qualified protected veterans, and requires affirmative action by covered prime contractors and subcontractors to employ and advance in employment qualified protected veterans." (May be combined with other required AAP statements.)

This is only a summary statement of the requirements of 41 CFR 60-300.5(a). This will apply for the full duration of such contract regardless of changes in the annual value. This clause is also deemed to be part of such contracts by operation of the law.

O. MANDATORY JOB LISTING WITH STATE

60-300.5

We will list all employment openings with the local office of the State Employment Service at least concurrent with any other recruiting activity. Referral of qualified veterans will be accepted.

"All employment openings" shall include jobs not generated by the contract and those occurring at establishments other than the one wherein the contract is being performed, but excluding those of independently operated corporate affiliates. Also excluded are openings which are to be filled exclusively from within the contractor's organization (with no consideration of any external candidates), or from leave, layoff/recall lists, executive or top management jobs, or jobs lasting less than 3 days.

We must also advise the employment service delivery system in each state where we have establishments that we are federal contractor, that we desire priority referrals of protected veterans for job openings at each facility, and we also provide them the name, location and contact information for each hiring official at each location.

P. RESPONSIBILITY for IMPLEMENTATION

60-300.44(i)

Implementation and management of the Affirmative Action Plan is the responsibility of every supervisor. Specific responsibilities shall be allocated as follows:

1. Top Executives – President and Vice Presidents:
Provides support to the overall Affirmative Action plan by working with the Affirmative Action Officer on meetings, problem solving, and communication of the policy. Evaluates supervisor effectiveness in supporting the policy. Approves required amendments and assists in coordinating other corporate activity with this policy.
2. The Affirmative Action Officer:
Reporting to and with the full support of top management, Christine Purviance, Assistant Director Equity and Inclusion, is responsible for coordinating all compliance activities of the staff and management and filing related reports. Among the specific duties are:
 - a. Oversees and enforces University compliance with federally-mandated Affirmative Action functions;
 - b. Develops communications materials, policies and procedures, and arranges for their approval and dissemination;

- c. Identifies problem areas in conjunction with management and employees; suggesting resolutions, including prevention of harassment, career counseling, etc;
 - d. Serves as liaison with relevant agencies, in conjunction with Employment Specialist.
 - e. Serves as the contact person for the Office of Federal Contract Compliance Programs (OFCCP) and other compliance agencies;
 - f. Collaborates with University departments on strategies to increase diversity hiring and integrate Affirmative Action efforts with broader University-wide diversity initiatives;
 - g. Keeps management informed of new developments;
 - h. Reviews job requirements and evaluates selection practices in conjunction with Employment Specialist;
 - i. Trains those involved in selection and placement to support this policy;
 - j. In coordination with HRIS Manager, compiles annual statistics, supporting data and the Current Plan Year Report. Obtains needed information from supervisors and other sources and incorporates into the summary. Presents the summary to management and helps develop approaches to meet goals;
 - k. Ensures record keeping on personnel activity, compensation and applicant flow by job group, EEO class, ethnic background and sex. Ensures privacy and confidentiality;
 - l. Monitors reports to measure plan effectiveness and coordinates development of action plans from each year's reports;
3. Department Chairs and Supervisors:
- a. Advise Affirmative Action Officer of any potential problems pertinent to this policy as early as possible, and cooperate fully and candidly with any necessary internal investigation.
 - b. Refer inquiries or requests from outside third parties to the Affirmative Action Officer, while asserting that we are an affirmative action employer.
 - c. Develop and use only job related criteria for selection, evaluation, and other decisions. Review qualifications of all faculty and staff to ensure that veterans are given full opportunities for promotion.

- d. Report promptly any employee involved in harassment of others, assist and comply with investigation as required.
 - e. Cooperate in identifying problem areas, executing action plans, and assessing progress toward goals.
 - f. Provide objective individualized career counseling as needed. Encourage veterans to participate in employer-sponsored activities.
 - g. Evaluate assigned staff in their compliance with this policy.
4. All Faculty and Staff:
- a. Promote our Affirmative Action efforts by referring qualified minorities and women they may know.
 - b. Treat fellow faculty and staff with acceptance, inclusion and respect, avoiding unwelcome and/or derogatory language.
 - c. Use proper supervisor channels or the Affirmative Action Officer to report potential problems early.

Q. PLAN ACCESS by FACULTY, STAFF and APPLICANTS 60-300.41, .44

Faculty, staff and the general public may view this policy on the Human Resources Equal Opportunity page of the Gonzaga University website. Periodic announcements will be placed in morning mail and other newsletters to communicate the location and purpose of this plan.

R. INVITATION to SELF-IDENTIFY

60-300.42

Gonzaga University invites faculty, staff, and applicants who believe they are covered by this policy to identify themselves voluntarily in order to take part in our Affirmative Action Plan. The opportunity to self-identify occurs prior to a job offer on a form designed for that purpose and again after a job offer but before the applicant begins his or her job duties on another form designed for that purpose.

Additional invitations to faculty and staff will be made at least every five (5) years with a reminder in between. Faculty and staff may respond to this invitation to self-identify at any time via zagweb.gonzaga.edu.

No adverse treatment will result from refusal to provide information which the employee or applicant wishes not to provide. Such information will remain confidential and be used only for purposes of compliance with the law and regulations. Faculty, staff, and applicants shall be protected from intimidation, coercion or retaliation for filing a grievance or assisting in an investigation applicable to this policy.