

Affirmative Action Plan

Veterans & Individuals with Disabilities

October 2016-September 2017

HAMMOND CAMPUS



PURDUE
UNIVERSITY.
NORTHWEST.

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I. Statement Of Purpose

A. Purpose and Applicability of the Affirmative Action Plan for Protected Veterans and Individuals with Disabilities

1. Purpose

Because Purdue University Northwest is the recipient of federal contracts, it is required by federal law to develop a written affirmative action program for veterans and individuals with disabilities. This program complies with Section 503 of the Rehabilitation Act of 1973 and the Vietnam Era Veterans' Readjustment Act of 1974 (38 USC 4212), as amended. A complete affirmative action program also includes mechanisms that enable the University to continually monitor and evaluate its employment practices to ensure that they are free of bias and discrimination based on race, color, sex, disability, age, veteran status, religion, national origin, ancestry, genetic information, marital status, parental status, sexual orientation, or gender identity and expression.

The purpose of the Affirmative Action Plan for Veterans and Individuals with Disabilities is to reaffirm the University's continuing commitment to the principles of affirmative action and equal employment opportunity. In addition, the Affirmative Action Plan for Veterans and Individuals with Disabilities serves as a working document for reporting academic and staff personnel actions, and apprising the University of information relevant to the development, analysis, enforcement, evaluation, dissemination, and monitoring of the plan and its policies.

2. Access to the Plan

The Affirmative Action Plan is distributed to all Purdue University Northwest employees annually via the [Office of Equity, Diversity, & Inclusion website](#).¹ Individuals external to the University are able to access the plan via the web as well. Hard copies of the plan are distributed to all senior leaders and Department managers, which include the Chancellor, Vice Chancellors, and College Deans. Additionally, the library has a copy of the plan, which is available for review by faculty, staff, students and the community. Individuals may also access the plan in the Office of Equity, Diversity, & Inclusion located in Lawshe Hall, Room 231 at the Hammond campus.

3. Applicability

The Affirmative Action Plan for Protected Veterans and Individuals with Disabilities applies to all departments at Purdue University Northwest. Administrative leaders are charged with the responsibility of educating their employees regarding the content of the plan. The Office of Institutional Equity on the West Lafayette campus supports the Purdue University Northwest Plan.

Invitation to Self-Identify

As part of Purdue University Northwest's affirmative action obligation, the University invites applicants for employment to state whether the applicant believes that s/he is an individual with a disability and/or a protected veteran. After an offer of employment has been made, but before the individual begins working, Purdue again offers the opportunity to state whether the individual believes that s/he is an individual with a disability and/or a protected veteran.

¹ <http://www.pnw.edu/diversity>

Additionally, at five year intervals, the University invites employees to voluntarily inform Purdue University Northwest whether the employee believes that s/he is an individual with a disability. At least once during the intervening years between invitations to self-identify their disability status, Purdue University Northwest reminds employees that they may voluntarily update their disability status.

All self-identification information is confidential and maintained by Purdue University.

B. Definitions

All defined terms are capitalized throughout this Affirmative Action Plan for Protected Veterans and Individuals with Disabilities:

Protected Veteran includes a Disabled Veteran, a Recently Separated Veteran, an Active Duty Wartime or Campaign Badge Veteran, and Armed Forces Service Medal Veteran.

Active Duty Wartime or Campaign Badge Veteran

Any 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.

Armed Forces Service Medal Veteran

Any 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.

Recently Separated Veteran is 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.

Disability

(1) A physical or mental impairment that substantially limits one or more major life activities for such individual; (2) a record of such an impairment; or (3) being regarded as having such an impairment.

This definition does not include individuals: (1) currently engaging in the illegal use of drugs when the university acts on the basis of such use; (2) whose current use of alcohol prevents them from performing the essential functions of the employment position or whose current alcohol abuse would constitute a direct threat to property or to the health or safety of the individual or others; or (3) who currently has a contagious disease or infection that prevents them from performing the essential functions of the employment position, or who, by reason of such disease or infection, would constitute a direct threat to the health or safety of the individual or others.

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

Qualified Individual with a Disability is one who satisfies the requisite skill, experience,

education, and other job-related requirements of the employment position such individual holds or desires and who, with or without reasonable accommodation(s), can perform the essential functions of such position.

Discrimination

The process of illegally differentiating between people on the basis of group membership rather than individual merit.

Equal Employment Opportunity

A concept that proclaims the right of each person to apply and be evaluated for employment opportunities without regard to race, religion, color, sex, age, national origin or ancestry, genetic information, marital status, parental status, sexual orientation, gender identity and expression, disability, or status as a veteran. It guarantees everyone the right to be considered solely on the basis of his/her ability to perform the duties of the job in question, with or without reasonable accommodation(s).

Individual discrimination

When a person is subjected to unequal treatment on the basis of race, religion, color, sex, age, national origin or ancestry, genetic information, marital status, parental status, sexual orientation, gender identity and expression, disability, or status as a veteran.

Systemic discrimination

Unequal treatment that results from “neutral” institutional practices that continue the effect of past discrimination.

Reasonable Accommodation is a modification or adjustment to a job, the work environment, or the way a job is usually done that enables a qualified individual with a disability to enjoy an equal employment opportunity.

Undue Hardship is an action that requires significant difficulty or expense in relation to the size of the employer, the resources available, and the nature of the operation.

C. Equal Employment Opportunity Objectives

In support of these policies and considerations, specific equal employment opportunity objectives at the University include the following:

1. To recruit, hire, train, and promote persons in all job classifications without regard to veteran status or disability.
2. To make decisions within all stages of the employment process that will further the principles of equal employment opportunity.
3. To ensure that criteria for all personnel actions, including recruitment, hiring, promotion, granting of tenure, compensation, employee benefits, University-sponsored education, selection for education, tuition assistance, recreation programs, transfer, demotion, layoff, return from layoff, discipline, termination, and all other terms, conditions and privileges of employment are job related and realistic.

4. To apply the principles of affirmative action to correct problems and ensure equal opportunity for veterans and individuals with disabilities.

D. Legal Basis

[A summary of federal and state laws and executive orders on the topics of nondiscrimination and affirmative action²](#) is available online.

II. Reaffirmation of Policy

At its meeting on January 21, 1970, the Board of Trustees reaffirmed and reinforced the University's general policy of equal opportunity by issuing a statement of policy and responsibility. Since that time, the statement has been amended. It currently reads:

Purdue University is committed to maintaining an inclusive community that recognizes and values the inherent worth and dignity of every person; fosters tolerance, sensitivity, understanding and mutual respect among its members; and encourages each individual to strive to reach his or her own potential. In pursuit of its goal of academic excellence, Purdue University seeks to develop and nurture its diversity. The University believes that diversity among its many members strengthens the institution, stimulates creativity, promotes the exchange of ideas and enriches campus life.

Purdue University views, evaluates and treats all persons in any university-related activity or circumstance in which they may be involved solely as individuals on the basis of their own personal abilities, qualifications and other relevant characteristics.

Purdue University does not condone and will not tolerate Discrimination against any individual on the basis of race, religion, color, sex, age, national origin or ancestry, genetic information, disability, status as a veteran, marital status, parental status, sexual orientation, gender identity or gender expression. Purdue University promulgates policies and programs to ensure that all persons have equal access to its employment opportunities and educational programs, services and activities. The principal objective of this policy is to provide fair and consistent treatment for all students and employees of the University. Purdue is committed to increasing the recruitment, selection and promotion of faculty and staff at the University who are racial or ethnic minorities, women, persons with disabilities and veterans. The University also is committed to policies and programs that increase the diversity of the student body.

The President of the University is charged with overall responsibility for nondiscrimination and equal opportunity.

In furtherance of the University's equal employment opportunity and affirmative action obligations, the President of the University has implemented the preceding policy through a number of actions, including issuance of Purdue University's Nondiscrimination Policy

² <http://www.purdue.edu/oie/>

Statement and the issuance of the University policy, [Equal Opportunity, Equal Access and Affirmative Action](#)³, last revised July 1, 2016.

III. Internal and External Dissemination

The University disseminates its equal employment opportunity policy both internally and externally utilizing the following procedures:

A. Internal Dissemination

1. Published Documents and Postings

Purdue University Northwest communicates the University policy statement on equal employment opportunity/affirmative action to all employees through a variety of communication methods. The Chancellor's Office notifies all employees annually via email of the policy. The statement is also included in the Faculty and Staff Handbook, which is distributed yearly to new hires on their first day of employment. In addition, the statement is incorporated in Purdue system-wide publications.

2. Programs and Presentations

The Chancellor and other senior executive staff continue to periodically emphasize the EEO/AA policy and procedures in meetings with Administrators, Deans, Department Heads, and Directors.

New faculty and staff orientation includes an overview of the Equal Opportunity, Equal Access and Affirmative Action policy and of the University's Nondiscrimination Policy Statement. In addition, faculty and staff are provided with the **Fostering Respect, Creating Community** booklet, which includes the Equal Opportunity, Equal Access and Affirmative Action policy. Additionally, the University's Nondiscrimination Policy Statement is included in the **Access Purdue** booklet, a disability resource guide for faculty and staff.

The Executive Director of the Office of Equity, Diversity, & Inclusion provides training to the hiring supervisors and faculty search committee members on Equal Employment Opportunity laws and the University's policy and procedures regarding Equal Employment Opportunity, Equal Access and Affirmative Action. All faculty advertisements and postings are reviewed by the Office of Equity, Diversity, & Inclusion to ensure that appropriate equal employment opportunity language and the equal employment opportunity statement are included. Faculty Hiring Guides are available for hiring supervisors to access, which include the Equal Employment Opportunity policy.

For staff searches, the Executive Director of the Office of Equity, Diversity, & Inclusion informs the search committee members and hiring supervisors of their equal employment opportunity, equal access and affirmative action responsibilities. A hiring manual is available for search committee members to reference as well.

³<http://www.purdue.edu/policies/ethics/iic2.html>

Equal Employment Opportunity posters and other required notices are displayed on general bulletin boards in campus buildings.

B. External Dissemination

1. Advertisements and Notices

Staff from the Office of Equity, Diversity, & Inclusion and the Human Resources Department review all faculty and staff position announcements prior to advertising to ensure the following statement is included in the advertisements: “Purdue University is an EEO/AA employer fully committed to achieving a diverse workforce. All individuals, including minorities, women, individuals with disabilities, and protected veterans are encouraged to apply.”

The Purchasing Office sends written notification of the policy, including the Equal Opportunity clause, to all sub-contractors, vendors and suppliers doing business with the University.

The Facilities Planning section of the Physical Plant includes the policy and equal opportunity clause in the general conditions of all contracts that are bid on for construction, rehabilitation, alteration, conversion, renovation, extension or repair of buildings, roadways, or other real property. When a contract is signed those conditions are referred to in the contract text.

2. Other Methods

[Affirmative Action policies and procedures](#)⁴ are available on the University web site.

The Office of Institutional Advancement periodically prepares publicity releases, newspaper articles and campus generated media videos to highlight campus diversity and inclusion programs as well as activities and services related to equal opportunity and affirmative action.

IV. Implementation and Responsibility

Ultimate responsibility for compliance with the applicable nondiscrimination and affirmative action laws and policies rests with the Board of Trustees and with the University’s executive officers.

A. Board of Trustees

The University is governed by a ten-member Board of Trustees appointed by the Governor of the State of Indiana. Their charge includes selecting the President of the University, deciding major policy lines, approving the financial program and budget, approving the President’s nominations for major appointments, and approving all construction and major contracts. The members of the Board of Trustees are as follows: Lawrence “Sonny” Beck, Michael R. Berghoff (Chairman), JoAnn Brouillette, Vanessa Castagna, Malcolm DeKryger, Michael F. Klipsch, Gary J. Lehman, Cameron S. Mann (Student Trustee), Thomas E. Spurgeon (Vice Chairman) and Don Thompson.

⁴ <http://www.purdue.edu/policies/ethics/iic2.html>

B. Executive Staff, Line Management, and Supervisors

Mitchell E. Daniels, Jr., President of the University, assumes full responsibility for the successful implementation of the University's Equal Employment Opportunity Policy and the Affirmative Action Plan.

Alysa C. Rollock, Vice President for Ethics and Compliance is the University's Equal Opportunity Officer and provides general oversight and leadership for the University's overall compliance efforts for faculty, staff, and students, including compliance with Title VI of the Civil Rights Act of 1964, Title VII of the Civil Rights Act of 1964 (as amended by the Civil Rights Act of 1991), Title IX of the Education Amendments of 1972, Sections 503 and 504 of the Rehabilitation Act of 1973, the Age Discrimination in Employment Act of 1967, Executive Order 11246 (as amended by Executive Order 11375), the Americans with Disabilities Act of 1990, the Americans with Disabilities Act Amendments Act of 2008, the Genetic Information Nondiscrimination Act of 2008, Executive Order 13672 and state civil rights statutes.

Vice Chancellors, Associate/Assistant Vice Chancellors, College Deans, Department Chairs, Directors, and supervisors are responsible for promoting equal employment opportunity and applying affirmative action principles.

Evaluations of administrators and supervisors will consider their promotion of equal employment opportunity and application of affirmative action principles.

C. Director of Office of Institutional Equity

Deborah B. Trice, Director of Compliance reports directly to the Vice President for Ethics and Compliance and is responsible for developing, coordinating, and maintaining an annual Affirmative Action Plan for the West Lafayette campus. Erin Oliver, Director of Institutional Equity, provides assistance to the regional campus Equal Opportunity/Affirmative Action Officers, including, but not limited to, the preparation of required state and federal reports, workforce analysis and professional development. The staff of the Office of Institutional Equity located on the West Lafayette campus assists the Director with implementing and monitoring the Affirmative Action Plan.

D. Cross Reference to Regulations

The contents of this plan are in compliance with the regulations contained in 41 CFR 60-250.44 (required contents of affirmative action programs for Protected Veterans) and 41 CFR 60-741.44 (required contents of affirmative action programs for Individuals with Disabilities).

V. Identification of Problem Areas and Recommendations

In order to comply with the regulations implementing Section 503 of the Rehabilitation Act of 1973 and the Vietnam Era Veterans' Readjustment Act, required actions are audited. This section lists the analytical steps used to identify potential problem areas and briefly notes some of the findings and recommendations being made. It also discusses actions being taken or planned to respond to changes that have been made to Section 503 of the Rehabilitation Act of 1973 and the Vietnam Era Veterans' Readjustment Act that affect the University's Affirmative Action Program.

A. Review of Selection Process

The University must observe requirements of the Uniform Guidelines on Employee Selection Procedures. When problems are found, the selection process is reviewed to ensure that only job-related, non-discriminatory factors were considered in making employment decisions and that veterans and qualified individuals with disabilities received equal consideration. Officials who make hiring decisions are informed of the need to take corrective action when adverse impact is found in the recruitment or selection process.

The University shall review all physical and/or mental job qualification requirements when positions are submitted for review to insure that, to the extent qualification requirements tend to screen out qualified individuals with disabilities, they are job-related and are consistent with business necessity and the safe performance of the job.

1. Job Requirements and Descriptions

The Employment/Compensation Manager reviews the position descriptions to ensure the knowledge, skills, and abilities required are the minimum qualifications needed to perform the essential functions of the position. In situations where the requirements may narrow the pool on the drafted position description, Human Resources staff consults with the supervisor and makes recommendations for broadening the requirements to avoid adverse impact. For faculty positions, the Office of Equity, Diversity, & Inclusion and the Office of the Vice Chancellor for Academic Affairs and Provost reviews the job requirements and descriptions prior to posting and advertising.

2. Referral Procedures

For faculty positions, the Search Advisory Chair compares the applicants' qualifications to the job requirements to determine the bona fide applicants. The Faculty Search Advisory Committee members review all bona fide applications.

For staff positions, the Human Resources Department refers those that self-identify as meeting the minimum qualifications to the hiring department.

3. Pre-employment Inquiries

Sections 503 and 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act of 1990 limit the use of pre-employment inquiries and medical examinations. Specifically, any identification of a disability by inquiry or examination during the pre-offer stage, including all job pre-tests, reference checks, interview forms/questions, and other information gathering procedures, is prohibited. Recent changes to Section 503 require the University to offer applicants the chance to voluntarily self-disclose their status as a person with a disability during the pre-offer and post-offer stages of job searches. Similar changes to the Vietnam Era Veterans' Readjustment Act require that contractors invite applicants to self-identify as protected veterans at both the pre-offer and post-offer phases of the application process.

B. Recruitment

1. Appropriateness of Outreach

The Office of Equity, Diversity, & Inclusion and the Human Resources Department are responsible for coordinating advertising activities designed to recruit veterans and individuals with disabilities. Employment opportunities are publicized in a variety of media. In addition, Human Resources personnel attend job fairs to reach a wider circle of potential applicants.

Each employing unit must consider an applicant in terms of the essential elements of the position necessary to perform the job competently with or without a reasonable accommodation.

Individuals with disabilities who cannot perform the essential functions of the job, with or without a reasonable accommodation, are not considered to be qualified.

Veterans and individuals with disabilities who apply for positions are given the opportunity to request reasonable accommodation/alternative format statements.

Any determination of disability shall be accorded the confidentiality of other medical data and shall not be used to exclude a qualified individual with a disability.

The Office of Equity, Diversity, & Inclusion and the Human Resources Department will assist employing units in developing accommodations when such accommodations involve analyzing and restructuring jobs for qualified applicants with disabilities.

2. Review of Sources

The Office of Equity, Diversity, & Inclusion and the Human Resources Department are available to assist departments in identifying appropriate recruitment sources. It is expected that departments will be familiar with principal sources specific to their area of expertise.

Findings:

The Office of Equity, Diversity, & Inclusion and the Human Resources Department partnered together and researched organizations that target veterans and individuals with disabilities. As a result of this initiative, the Human Resources Department has been distributing posting summaries to these agencies.

The Human Resources Department meets with hiring supervisors and search chairs of staff vacancies to review hiring, classification and compensation processes as well as helpful tools in order to conduct a successful search-

Recommendations:

The Human Resources Department will continue to enhance the University's recruitment strategies to put forth best faith efforts in attracting diverse applicant pools that include veterans and persons with disabilities.

The Office of Equity, Diversity, & Inclusion and the Human Resources Department will assess the University's outreach and recruitment efforts and recommend changes as appropriate. The efforts will evaluate the efficacy of enlisting the assistance and support of the following persons and organizations in recruiting, and developing on-the-job training opportunities for individuals with disabilities:

- (A) Indiana Vocational Rehabilitation Services (VRS);
- (B) American Job Centers near the University, including WorkOne Hammond, WorkOne Gary and Portage WorkOne;
- (C) Department of Veterans Affairs Regional Offices, including the Gary Area Veterans Center and the Chicago Heights (IL) Veterans Center;
- (D) Entities funded by the Department of Labor that provide recruitment or training services for individuals with disabilities, such as the services currently provided through the Employer Assistance and Resource Network (EARN);
- (E) Local Employment Network (EN) organizations listed in the Social Security Administration's Ticket to Work Employment Network Directory;
- (F) Local disability groups, organizations, or Centers for Independent Living (CIL) near the University, including Everybody Counts in Merrillville;
- (G) Placement or career offices of educational institutions that specialize in the placement of individuals with disabilities; and
- (H) Private recruitment sources, such as professional organizations or employment placement services that specialize in the placement of individuals with disabilities.

(ii) The Office of Equity, Diversity, & Inclusion and Human Resources Department will also consider the efficacy of the following:

- (A) Conducting formal briefing sessions with representatives from recruiting sources that include clear and concise explanations of current and future job openings, position descriptions, worker specifications, explanations of the University's selection process, and recruiting literature, with the goal of making formal arrangements for referral of applicants, follow up with sources, and feedback on disposition of applicants.
- (B) Incorporating into the University's recruitment efforts special efforts to reach students who are individuals with disabilities.
- (C) Participation in work-study programs for students, trainees, or interns with disabilities.

(D) Including individuals with disabilities in career days, youth motivation programs, and related activities.

The Office of Equity, Diversity, & Inclusion and Human Resources Department will evaluate the efficacy of enlisting the assistance and support of the following persons and organizations in recruiting, and developing on-the-job training opportunities for veterans:

(A) Local Veterans' Employment Representatives;

(B) Department of Veterans Affairs Regional Offices, including the Gary Area Veterans Center and the Chicago Heights (IL) Veterans Center;

(C) The service officers of the national veterans' groups active in the Hammond area;

(D) Local veterans' groups and veterans' service centers in Northwest Indiana;

(E) The Department of Defense Transition Assistance Program (TAP), or any subsequent program that, in whole or in part, might replace TAP; and

(F) Any organization listed in the Employer Resources section of the National Resource Directory, or any future service that replaces or complements it.

(ii) The Office of Equity, Diversity, & Inclusion and Human Resources Department will also consider the efficacy of taking the actions listed below:

(A) Conducting formal briefing sessions with representatives from recruiting sources that include clear and concise explanations of current and future job openings, position descriptions, worker specifications, explanations of the University's selection process, and recruiting literature, with the goal of making formal arrangements for referral of applicants, follow up with sources, and feedback on disposition of applicants.

(B) Incorporating into the University's recruitment efforts special efforts to reach students who are protected veterans.

(C) Participation in work-study programs with the Department of Veterans Affairs rehabilitation facilities which specialize in training or educating disabled veterans.

(D) Including protected veterans in career days, youth motivation programs, and related activities.

(E) Any other positive steps necessary to attract qualified protected veterans not currently in the work force who have requisite skills and can be recruited through affirmative action measures.

(F) Considering applicants who are known protected veterans for all available positions for which they may be qualified when the position(s) the applicants applied for is unavailable.

(G) Listing its job openings with the National Resource Directory's Veterans Job Bank, or any future service that replaces or complements it.

C. Education

All educational programs offered through the University are open to participation by veterans and individuals with disabilities.

Findings:

The Human Resources Department maintains a record of participants who attend training sessions sponsored by Human Resources.

Recommendations:

The Human Resources Department will continue to work with other units within the University to develop a methodology for collecting educational opportunity records.

D. Complaints and Grievances

Faculty have access to the University grievance procedures to resolve claims related to University action or decisions related to their employment as outlined in the [Faculty Grievances Policy I.B.1](#)⁵ located online.

Administrative, professional, clerical, and service staff members have access to the [University Grievance Procedures set forth in Policy V.D.1](#).⁶

[All employees bringing complaints alleging discrimination are directed and encouraged to use the procedures established for filing such complaints](#)⁷, as indicated in the [Equal Opportunity, Equal Access and Affirmative Action Policy III.C.2](#).⁸ (See also the [Office of Equity, Diversity, & Inclusion website](#)⁹.) In these cases, the Office of Equity, Diversity, & Inclusion will participate in investigating and resolving the issue.

Complaints alleging harassment are processed in accordance with the [Anti-Harassment Policy III.C.1](#)¹⁰ and the “[Procedures for Resolving Complaints of Discrimination and Harassment](#)¹¹.” The Vice President for Ethics and Compliance is responsible for overseeing and coordinating the enforcement of policies and procedures that deal with discrimination and harassment for all campuses and operations in the University system. (See also the [Office of Equity, Diversity, & Inclusion website](#)¹²).

⁵ <http://www.purdue.edu/policies/academic-research-affairs/ib1.html>

⁶ <http://www.purdue.edu/policies/human-resources/vid1.html>

⁷ <https://www.purdue.edu/ethics/resources/resolving-complaints.html>

⁸ <http://www.purdue.edu/policies/ethics/iic2.html>

⁹ <http://www.pnw.edu/diversity/>

¹⁰ <http://www.purdue.edu/policies/ethics/iic1.html>

¹¹ <http://www.purdue.edu/ethics/resolvingcomplaints.html>

¹² <http://www.pnw.edu/diversity/>

The Office of Equity, Diversity, & Inclusion monitors complaints and requests for assistance on a regular basis. To facilitate this process, the Office of Equity, Diversity, & Inclusion developed a complaint database containing key information about complaints filed with the Office.

In addition, the Office of Equity, Diversity, & Inclusion evaluates any patterns or trends that suggest areas requiring remedial actions. For example, a disproportionately high number of complaints from a particular academic department would trigger an inquiry or investigation by the Office of Equity, Diversity, & Inclusion.

A Diversity and Inclusion Awareness program was initiated by the University for all employees beginning in September 2013. One of the goals of the Diversity and Inclusion Awareness program was to increase understanding amongst University employees and to reduce conflicts and tension that can lead to complaints and grievances. The University expects all new employees to complete the program. Due to unification, the Diversity & Inclusion Awareness Program is being revised to be inclusive of the Hammond and Westville campuses.

E. Contract Compliance

The University informs all contractors, vendors, and suppliers of the affirmative action policy, requesting appropriate action on their part.

F. Veterans' Employment Report

The Federal Contractor Veterans' Employment Report VETS-100A is completed annually by the Office of Institutional Equity at the West Lafayette campus.

FEDERAL CONTRACTOR VETERANS' EMPLOYMENT REPORT VETS-4212

OMB NO: 1293-0005

Expires: 11/30/2017

Persons are not required to respond to this collection of information unless it displays a valid OMB number. It is mandatory for a covered Federal contractor respond to this information collection. See 38 U.S.C. § 4212(d) and "Who Must File" section of instructions.

RETURN COMPLETED REPORT TO:

VETS-4212 Submission
VETERANS' EMPLOYMENT AND TRAINING SERVICE (VETS)
Service Center

In care of: Department of Labor National Contact Center (DOL-NCC)
15000 Conference Center Drive, Suite B0132
Chantilly, VA 20151

ATTN: Human Resource/EEO Department

TYPE OF REPORTING ORGANIZATION (Check one or both, as applicable) <input checked="" type="checkbox"/> Prime Contractor <input type="checkbox"/> Subcontractor	TYPE OF FORM (Check only one) <input type="checkbox"/> Single Establishment <input checked="" type="checkbox"/> Multiple Establishment-Headquarters <input type="checkbox"/> Multiple Establishment-Hiring Location <input type="checkbox"/> Multiple Establishment-State Consolidated (specify number of locations) (MSC)
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COMPANY IDENTIFICATION INFORMATION (Omit items preprinted above-ADD Company Contact Information Below)	
COMPANY No: T131942	TWELVE MONTH PERIOD ENDING: 0 8 3 0 2 0 1 6 <small>M M D D Y Y Y Y</small>
NAME OF PARENT COMPANY: Purdue University	ADDRESS (NUMBER AND STREET): 155 S. Grant Street
CITY: West Lafayette	COUNTY: Tippecanoe STATE: IN ZIP CODE: 47907
NAME OF COMPANY CONTACT: Alison Vierk	TELEPHONE FOR CONTACT: 7654962974 EMAIL: avierk@purdue.edu

NAME OF HIRING LOCATION: Purdue University - Calumet Campus	ADDRESS (NUMBER AND STREET): 2233 171st Street
CITY: Hammond	COUNTY: Lake STATE: IN ZIP CODE: 46323

NAICS: 0 0 6 1 1 3	DUNS: 0 7 - 2 0 5 - 1 3 9 4	EMPLOYER ID (IRS TAX No.): 3 5 - 6 0 0 2 0 4 1
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INFORMATION ON EMPLOYEES

REPORT THE TOTAL NUMBER OF EMPLOYEES AND NEW HIRES WHO ARE PROTECTED VETERANS, AS DEFINED IN THE INSTRUCTIONS. DATA ON NUMBER OF EMPLOYEES ARE TO BE ENTERED IN COLUMN A AND B, LINES 1.1 THROUGH 9. DATA FOR NEW HIRES ARE ENTERED IN COLUMNS C AND D. LINE 10 IS TOTAL OF EACH COLUMN. ENTRIES IN COLUMNS C AND D, LINES 1.1 THROUGH 9 (GRAY SHADED AREAS) ARE OPTIONAL. ENTER THE MAXIMUM AND MINIMUM NUMBER OF EMPLOYEES.				
JOB CATEGORIES	NUMBER OF EMPLOYEES		NEW HIRES (PREVIOUS 12 MONTHS)	
	PROTECTED VETERANS (A)	TOTAL EMPLOYEES (B)	PROTECTED VETERANS (C)	TOTAL NEW HIRES (D)
EXECUTIVE/SENIOR LEVEL OFFICIALS AND MANAGERS 1.1	0	28	0	2
FIRST/MID LEVEL OFFICIALS AND MANAGERS 1.2	0	35	0	2
PROFESSIONALS 2	2	372	0	25
TECHNICIANS 3	2	63	0	7
SALES WORKERS 4	0	0	0	0
ADMINISTRATIVE SUPPORT WORKERS 5	1	124	0	12
CRAFT WORKERS 6	1	12	0	0
OPERATIVES 7	0	0	0	0
LABORERS/HELPERS 8	0	0	0	0
SERVICE WORKERS 9	1	60	0	11
TOTAL EMPLOYEES 10	7	694	0	59

Report the total maximum and minimum number of permanent employees during the period covered by this report.

Maximum Number	Minimum Number
694	656

Form VETS-4212 11/2014

VI. Development and Execution of Programs

A. Monitoring of Position Specifications

1. Staff

The Human Resources Department reviews all non-faculty position specifications for job-relatedness and non-discrimination on the basis of race, religion, color, sex, age, national origin or ancestry, genetic information, marital status, parental status, sexual orientation, gender identity and expression, disability, or status as a veteran, except where age, sex or national origin is a bona fide occupational qualification.

2. Faculty

Each academic department, with the assistance of the Office of Equity, Diversity, & Inclusion, is responsible for monitoring its respective faculty job specifications for job-relatedness and non-discrimination.

B. Distribution of Position Announcements

1. Staff

Staff position vacancies are posted on the Purdue University Northwest [Human Resources Department website](#)¹³. Hard copy listings are available on bulletin boards in campus buildings. Advertisements are placed as appropriate in local, regional and national publications. Position announcements are distributed to several organizations targeting veterans and individuals with disabilities. The Human Resources Department sends weekly electronic job notices campus-wide, encouraging referrals for interested parties.

2. Faculty

The Office of Equity, Diversity, & Inclusion monitors each faculty position announcement for an adequate search or recruitment plan. Material is further checked for compliance with equal employment opportunity and affirmative action guidelines and disclaimers. Faculty postings are also posted on the campus [Human Resources Department website](#)¹⁴

Each advertisement is reviewed to determine if it is likely to reach protected class members. When efforts appear inadequate, the Office of Equity, Diversity, & Inclusion will work with the search advisory chair to find alternative strategies, including, but not limited to, contacts with colleges and universities, consultation with the West Lafayette Office of Institutional Equity and/or individual networking efforts.

¹³ <http://www.pnw.edu/careers>

¹⁴ <http://www.pnw.edu/careers>

C. Selection Process

1. Staff Test Validation

Purdue University Northwest may utilize testing during the applicant selection process. Departments will work with Human Resources on such testing to ensure reliability and validity.

2. Selection Procedures

Education, skills, and experience summaries have been established for the review and referral of applicants with administrative, technical, or service job interests. The summaries rely on job specifications, and a comparison of each eligible applicant's work experience, skills, and knowledge. The referral of veterans and individuals with disabilities is supported through this system.

3. Education of Selection Personnel

Individuals responsible for making hiring decisions are provided information and guidance related to equal employment opportunity/affirmative action compliance, effective interviewing techniques and all other related topics by the Office of Equity, Diversity, & Inclusion in coordination with the Human Resources Department.

4. Adherence to Uniform Guidelines on Employee Selection

The Human Resources Department adheres to a standard format in the screening and referral process. Personal contact with the hiring supervisor throughout the process further ensures that hiring practices conform to the University policies and procedures.

D. Advertising

Staff from the Office of Equity, Diversity, & Inclusion and the Human Resources Department advise and assist departments regarding wording and tone of advertisements to ensure broad appeal.

E. Social and Recreational Opportunities

All University sponsored social and recreational functions offer equal opportunity to all employees without regard to veteran status or disability. Information about accommodations for persons with disabilities is included in publicity materials issued by the University regarding the functions.

F. Career Counseling

Employees have access to the Human Resources Department, Career Services, supervisors and the Office of Equity, Diversity, & Inclusion to discuss informal lines of progression, upward mobility, and transfer opportunities which may enhance development for protected class members.

G. Requests for Reasonable Accommodations

Purdue University Northwest uses an interactive process consistent with the requirements of the Americans with Disabilities Act Amendments Act of 2008 when employees request reasonable

accommodations. Applicants, faculty and staff may contact the Office of Equity, Diversity, & Inclusion for assistance with requesting reasonable accommodations.

H. Special Initiatives

Purdue University Northwest provides additional support for its affirmative action program through campus activities designed to raise awareness of equal employment opportunity and affirmative action. Faculty and staff are also encouraged to participate in similar activities provided through the West Lafayette campus. The following list is not exhaustive, but can be considered representative.

1. The Human Resources Department has an active outreach program to recruit individuals who have been traditionally underrepresented in our workforce.
2. Human Resources has added the following two advertising sources to assist in recruiting veterans and individuals with disabilities. They are The Arc of NWI, an organization that connects individuals with intellectual and developmental disabilities with various employment services. The second is Goodwill Industries, an organization that helps veteran and military families with employment services.
3. The Americans with Disabilities Act Advisory Committee, under the direction of the Office of Equity, Diversity, & Inclusion, is charged with evaluating and enhancing the physical accessibility of the campus. Assistance in developing appropriate workplace accommodations is provided by the Office of Equity, Diversity, & Inclusion.
4. The Office of Equity, Diversity, & Inclusion reviews the Affirmative Action Plans with the Vice Chancellors and Deans annually.
5. The Office of Equity, Diversity, & Inclusion has facilitated harassment and discrimination prevention training sessions with Purdue University Northwest employees. This training covered the following: definition of discrimination and harassment, an overview of the anti-harassment and nondiscrimination policies, behaviors that could be perceived as illegal, and Purdue procedures for resolving complaints of harassment and discrimination. The protected groups of veterans and individuals with disabilities were incorporated into this training.
6. The Veterans Enlisted Student Association has been established to provide a casual and comfortable means of socialization and support to enlisted veterans and their dependents.
7. Purdue University Northwest Veteran Services (formerly “From Boots to Books Program”), is a program designed to create a community of university personnel, students, and community agencies to provide support and service to veterans and student service members designed to increase the likelihood of them meeting their educational goals. Veterans Services not only caters to veterans and active service members who are students, but also to veterans and active service members in the nearby community.
8. On September 18, 2015, Purdue University Northwest observed National POW/MIA Recognition Day by having a moment of silence at 12:00 noon in remembrance of those who were prisoners of war and those who are missing in action.

9. Veteran Services (formerly From Boots to Books, Veteran and Student Service Members Academic Support Program) assists in providing housing opportunities for military students who do not qualify to live in campus residential housing. In addition, Veteran Services networks with various companies, organizations, and corporations to secure careers for qualified candidates. Veteran Services works with community colleges and veteran services to provide opportunities that will make the transition to the academic environment smoother.
10. Purdue University Northwest is a chapter member of SALUTE, the Veteran's National Honor Society. SALUTE supports veteran scholars in their adjustment to the academic world and allows them and their families the opportunity to network and also participate in social events.
11. Purdue University Northwest is in its third year of participation in the [Workforce Recruitment Program](#)¹⁵. This program is a recruitment and referral program that connects federal and private sector employers nationwide with college students and recent graduates with disabilities. Veterans are of primary interest for this program. It is led by Purdue University Northwest's Career Center.
12. [Bender Virtual Career Fair](#)¹⁶ is a virtual career fair that Purdue University Northwest participates in annually. This is the third year of participation. The virtual career fair is promoted to students, individuals with disabilities and veterans by Purdue University Northwest's Career Center.
13. Each year, the University sponsors programs and activities on Veteran's Day to honor the service of all who serve or have served in the armed forces. The activities include a flag raising ceremony and veteran's panel discussion.
14. Purdue University Northwest has employed individuals with professional expertise to ensure the web accessibility standards required by the Web Accessibility Policy and applicable federal laws are met. The Senior Digital Accessibility Specialist is responsible for providing the leadership, professional and technical expertise necessary to ensure that University Web-based content is equally accessible to all students, faculty, staff and community members. Under the Senior Digital Accessibility Specialist's guidance, thousands of online documents have been retrofitted to comply with accessibility standards, captioning has been added to dozens of online videos and training programs and skill development workshops are regularly conducted for web editors, staff, faculty and students to provide them with the knowledge and tools needed to create accessible digital content.

¹⁵ wrp.gov

¹⁶ careereco.com/events/disability

15. Web accessibility remains a primary concern for Purdue University Northwest. The campus continues to adhere to the Purdue University Web Accessibility Policy, adopted in 2010, requiring that all online content meet the United States Access Board's Section 508 Electronic and Information Technology Accessibility Guidelines. Progress toward achieving and maintaining fully accessible web pages is documented in an annual status report submitted to the Office of Equity, Diversity, & Inclusion.
16. Web pages, documents and videos posted online are audited periodically by the Senior Digital Accessibility Specialist to ensure that they remain compliant. Accessibility is built into the web themes and templates. Training in web accessibility is mandatory before a new editor is granted access to work on university web pages, and existing editors routinely attend refresher workshops. Additional workshops are conducted on a regular basis for editors, faculty, staff and students, to provide the knowledge, skills and tools necessary to create accessible digital content.
17. When forums or presentations are streamed, live on the web, CART services are provided routinely, and the transcripts are synced with the video recording when it is posted.
18. The Senior Digital Accessibility Specialist is working with the Office of Instructional Technology as well as individual colleges and departments to address the accessibility of instructional course materials, such as syllabi and videos in the learning management system.
19. The Purdue Web Accessibility Policy is in transition to a Standard and representatives from Purdue University Northwest have been actively engaged in contributing to the revision.
20. Diversity and Inclusion Awareness training was developed by the Office of Equity, Diversity, & Inclusion and the Multicultural Campus Council during spring and summer 2013. The training is being revised to be inclusive of the Hammond and Westville campuses and every Purdue University Northwest employee is required to complete the training. The training is designed in part to promote the inclusion of all University employees, including veterans and individuals with disabilities.
21. The Office of Equity Diversity and Inclusion hosted an American Sign Language movie screening event on the Westville and Hammond Campus in celebration of International Week of the Deaf during the month of September.

VII. Data Collection and Analysis

Protected Veterans

Purdue University Northwest has chosen to adopt OFCCP's current 7% hiring benchmark goal for protected veterans as opposed to calculating our own percentage goal. OFCCP's benchmark goal is not a quota which Purdue University Northwest must meet nor is it intended to represent a floor or ceiling for the University's recruitment of qualified protected veterans.

Purdue University Northwest shall document the following computations or comparisons pertaining to applicants and hires on an annual basis and maintain them for a period of three (3) years:

During the 2015- 2016 affirmative action year:

- 107 applicants self-identified as protected veterans.
- Purdue University Northwest had 125 job openings and filled 120 jobs.
- The total number of applicants for all jobs was 4,446.
- The total number of protected veterans applicants hired was 1.
- The total number of applicants hired was 120.

Individuals with Disabilities

Purdue University Northwest maintains data regarding the recruitment and hiring of individuals who self-identify as individuals with disabilities. Purdue University Northwest uses this data to evaluate the representation of individuals with disabilities in the University's workforce on the Hammond campus. These figures are not a quota which Purdue University Northwest must meet, nor are these figures intended to represent a floor or ceiling for the employment of individuals with disabilities on Purdue University Northwest's campus. Purdue University Northwest assesses its efforts to attain OFCCP's 7% utilization goal for the recruitment of individuals with disabilities on an annual basis.

Purdue University Northwest shall document the following computations or comparisons pertaining to applicants and hires on an annual basis and maintain them for a period of three (3) years:

During the 2015-2016 affirmative action:

- 174 applicants self-identified as individuals with disabilities.
- Purdue University Northwest had 125 job openings and filled 120 jobs.
- The total number of applicants for all jobs was 4,446.

- The total number of applicants with a disability hired was 8.
- The total number of applicants hired was 120.

The data indicates that the Hammond Campus met its 7% utilization goal for the recruitment of individuals with disabilities.