Affirmative Action Plan

Hammond Campus

Veterans & Individuals with Disabilities

October 2019-September 2020
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Statement of Purpose

Purpose and Applicability of the Affirmative Action Plan
For Protected Veterans and Individuals with Disabilities

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 Assistance Act (VEVRAA) 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, religion, color, sex, age, national origin, ancestry, disability, genetic information, veteran status, marital status, parental status, sexual orientation, gender identity, or gender 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, evaluations, dissemination, and monitoring of the plan and its policies.

Access to the Plan
The Affirmative Action Plan is distributed to all employees at the University via email and is available online. Individuals external to the University are able to access the plan via the web as well. Hard copies of the plan are distributed to the Chancellor, Vice Chancellors, and College Deans. Additionally, the library has a copy of the plan, which is accessible for faculty, staff, students, and the community. Individuals may also access the plan at the Office of Equity, Diversity and Inclusion in Schwarz Hall Room 25D at Purdue University Northwest on the Westville campus (1401 South U.S. Highway 421, Westville, Indiana) and in Lawshe Hall Room 218 on the Hammond campus (2200 169th Street, Hammond, Indiana) or at the Office of the Vice President for Ethics and Compliance located on the 10th floor of the Ernest C. Young Hall on the West Lafayette campus (155 South Grant Street, West Lafayette, Indiana).

Applicability
The Affirmative Action Plan for Protected Veterans and Individuals with Disabilities applies to all departments at the Hammond campus. The Office of the Vice President for Ethics and Compliance on the West Lafayette campus supports the Affirmative Action Plan for the Hammond campus.

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, the University again offers the opportunity to state whether the individual believe that s/he is an individual with a disability and/or a protected veteran. Additionally, at two year intervals, the Hammond campus invites employees to voluntarily inform the University whether the employee believes that s/he is an individual with a disability. Furthermore, every two years, Purdue University Northwest reminds employees that they may voluntarily update their disability status. The University maintains all information on self-identification confidential.

1 https://www.pnw.edu/diversity
Definitions

**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.

**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.

**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.

**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.

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

**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, during the three-year period beginning on the date of such veteran’s discharge or release from active duty.

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

**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.

**Equal Employment Opportunity Objectives**
In support of these policies and considerations, the University has identified specific equal employment opportunity objectives to 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.

**Legal Basis**
A summary of federal and state laws and executive orders on the topics of nondiscrimination and affirmative action is available online (PDF).
At its meeting on January 21, 1970, the Board of Trustees reaffirmed and reinforced the University’s general policy of equal opportunity by approving a statement of policy and responsibility. Since that time, the Nondiscrimination Policy Statement has been amended and currently reads:

“Purdue University is committed to maintaining a community which 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, the University seeks to develop and nurture 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.

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2 [https://www.purdue.edu/ethics/Affirmative_Action/FederalStateLawsExecutiveOrdersupdate.pdf](https://www.purdue.edu/ethics/Affirmative_Action/FederalStateLawsExecutiveOrdersupdate.pdf)
Purdue University prohibits discrimination against any member of the University community 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. The University will conduct its programs, services and activities consistent with applicable federal, state and local laws, regulations and orders and in conformance with the procedures and limitations as set forth in Purdue’s Equal Opportunity, Equal Access and Affirmative Action policy which provides specific contractual rights and remedies. Additionally, the University promotes the full realization of equal employment opportunity for women, minorities, persons with disabilities and veterans through its affirmative action program.”

In furtherance of the University’s equal employment opportunity and affirmative action (EEO/AA) obligations, the President of the University has implemented the preceding policy through a number of actions, including issuance of Purdue University’s Nondiscrimination Policy Statement and the Equal Opportunity, Equal Access and Affirmative Action Policy (III.C.2)\(^3\), last revised August 1, 2017.

**Internal and External Dissemination**

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

**Internal Dissemination**

**Published Documents and Postings**

Purdue University Northwest communicates to all employees through a variety of communication methods the University’s Equal Opportunity, Equal Access and Affirmative Action Policy (III.C.2). The Chancellor’s Office annually notifies all employees via email of the policy. In addition, the statement is incorporated in Purdue system-wide publications which include, but are not limited to the following: Faculty and Staff Handbook\(^4\), Inside Purdue: Fostering Respect, Creating Community booklet; and the Office of Equity, Diversity and Inclusion website\(^5\). The equal employment opportunity statement is also included on equal employment opportunity posters displayed on bulletin boards in campus buildings.

**Programs and Presentations**

The Chancellor and other senior executive staff continue to periodically emphasize this policy in meetings with administrators, Deans, Department Heads, and Directors.

New faculty and staff orientation includes an overview of equal employment opportunity/equal access/affirmative action (EEO/EA/AA) policies and procedures. In addition, faculty and staff are provided with the University’s Equal Access and Equal Opportunity booklet titled Fostering Respect, Creating Community, which includes this policy.

The Office of Equity, Diversity and Inclusion and Human Resources provide training to the hiring supervisors and faculty search advisory committee members of the EEO laws and University 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 and Inclusion to ensure the equal employment opportunity statement is included in all postings and advertisements.

For staff searches, Human Resources informs the search committee members and hiring supervisors of their EEO/EA/AA responsibilities. A hiring manual is available for search committee members to reference as well. Equal Employment Opportunity posters and other required notices are displayed on general bulletin boards in campus buildings.

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\(^3\) [http://www.purdue.edu/policies/ethics/iii2.html](http://www.purdue.edu/policies/ethics/iii2.html)

\(^4\) [http://www.purdue.edu/faculty_staff_handbook/](http://www.purdue.edu/faculty_staff_handbook/)

\(^5\) [http://www.pnw.edu/diversity](http://www.pnw.edu/diversity)
External Dissemination
Advertisements and Notices
The Office of Equity, Diversity and Inclusion and Human Resources staff review all faculty and staff position announcements prior to advertising to ensure the advertisement includes the statement: “Purdue University Northwest 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 subcontractors, 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.

Other Methods
Affirmative Action policies and procedures are available on the University website. The Office of Marketing and Communications periodically prepares publicity releases, newspaper articles, and campus generated media videos to highlight campus diversity and supportive programs, activities, and services related to equal opportunity/affirmative action.

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.

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 Klipsch, Gary J. Lehman, Noah Scott, Thomas E. Spurgeon (Vice Chairman), and Don Thompson.

Executive Staff, Line Management, and Supervisors
Mitchell E. Daniels, Jr., President of Purdue 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 Employment Opportunity Officer and provides general oversight and leadership for the University’s overall compliance efforts for faculty, staff, and students, including compliance with the 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 (ADAAA) of 2008, and the state civil rights statutes. Dr. Thomas L. Keon, Chancellor of Purdue University Northwest, is responsible for implementing the University Equal Opportunity/Affirmative Action (EO/AA) policies and procedures at the Westville and Hammond campuses. He is responsible for overseeing the establishment of goals and action-oriented programs on the campus and in integrating equal opportunity and affirmative action principles and objectives into all
employment related decisions. The Chancellor or designee is also responsible for reviewing recommendations for hiring, compensation, promotion, transfer or reassignment, and termination to ensure compliance with the University’s affirmative action program in both procedure and outcome. Additionally, the qualifications of applicants and reasons for selection are reviewed to ensure that protected veterans and persons with disabilities are given full opportunities for hire and promotion. Vice Chancellors, Associate/Assistant Vice Chancellors, College Deans, Department Heads, Directors, and supervisors are responsible for promoting equal employment opportunity and applying affirmative action principles.

**Affirmative Action Officer**

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 and for providing assistance to the regional campus Affirmative Action Officers, including, but not limited to, the preparation of required state and federal reports, workforce analysis, and professional development.

There is a designated Office of Equity, Diversity and Inclusion at both the Hammond and Westville campuses. Linda B. Knox, Executive Director of the Office of Equity, Diversity and Inclusion reports directly to Chancellor Keon and provides leadership and oversight of the Equity, Diversity, & Inclusion offices at both the Hammond and Westville campuses. The ADA Coordinators, Laura Odom (Westville) and Kimberly Trajkovski (Hammond) report directly to the Executive Director. The Executive Director is responsible for developing, implementing, and monitoring the Affirmative Action Plan, ensuring overall compliance efforts with Title VI, Title VII, Title IX, Section 503, Section 504, the Americans with Disabilities Act, Age Discrimination regulations, Executive Order 11246, and state civil rights statutes for all members of the University community.

**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).

**Identification of Problem Areas and Corrective Actions**

In order to comply with the regulations, stated in Section 503 of the Rehabilitation Act of 1973 and the Vietnam Era Veterans’ Readjustment Assistance 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 corrective actions to be taken.

**Review of Selection Process**

The University must observe requirements of the Uniform Guidelines on Employee Selection Procedures. When problems are found, the selection process will be reviewed to ensure that only job-related, non-discriminatory factors are considered in making employment decisions and that veterans and qualified individuals with disabilities have been considered. Selected officials will be 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 ensure that the minimum qualifications reflect what is needed to perform the essential functions of the job.
Job Requirements and Descriptions
The Employment 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 consult with the supervisor and make recommendations for broadening the requirements to avoid adverse impact. For faculty positions, the Office of Equity, Diversity and Inclusion reviews the job requirements and descriptions prior to posting and advertising.

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, Human Resources reviews the job seekers/applicants’ qualifications and refers the applicants who meet the minimum qualifications to the hiring supervisor.

Pre-employment Inquiries
Both Sections 503 and 504 of the Rehabilitation Act of 1973 and the ADA 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 form/questions, and other information gathering procedures, is prohibited.

Recruitment

Appropriateness of Outreach
The Office of Equity, Diversity and Inclusion and Human Resources 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 audience of potential applicants.

The University encourages individuals with disabilities to apply for employment opportunities. Information regarding accommodations and physical access is ensured for everyone. University guidelines for effective recruitment include, but are not limited to, the following:

- 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 reasonable accommodati
- 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 and Inclusion and Human Resources will assist employing units in developing accommodations when such accommodations involve analyzing and restructuring jobs for qualified applicants with disabilities.

Findings:
- Human Resources distribute all job openings to WorkOne, the local unemployment office.
Review of Sources
The Office of Equity, Diversity and Inclusion and Human Resources are available to assist hiring 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 and Inclusion and Human Resources partnered together and researched organizations that target veterans and individuals with disabilities. As a result of this initiative, Human Resources has been distributing posting summaries to these agencies. This demonstrates an enhancement to the University’s diversity outreach efforts.
- Human Resources provides a hiring manual for hiring supervisors and search committee members to reference during the search and screen process for staff positions. This manual includes a list of advertising sources.

Corrective Action:
- Human Resources will continue to enhance the recruitment strategies to put forth best faith efforts in attracting a diverse applicant pool to include veterans and persons with disabilities.

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

Findings:
- Human Resources maintains a record of participants who attend training sessions sponsored by Human Resources.
- The academic departments utilize Data180, a software application, which provides a systematic method for tracking faculty members’ professional development and other scholarly activities.

Complaints and Grievances
Faculty have access to the University grievance procedures to resolve claims related to University action or decision related to his or her employment as outlined by the Faculty Grievances Policy (I.B.1) located online.

Administrative, professional, clerical, and service staff members have access to the Dispute Resolution for Administrative/Professional and Clerical/Service Staff Members Policy (VI.D.1) and procedures. All employees bringing complaints alleging discrimination are processed pursuant to the Equal Opportunity, Equal Access and Affirmative Action Policy (III.C.2). Individuals are directed and encouraged to use the procedures established for filing such complaints, as indicated in the Procedures for Resolving Complaints of Discrimination and Harassment available online. In these cases, the Office of Equity, Diversity and Inclusion will participate in investigating and resolving the issue.

Complaints alleging harassment are processed in accordance with the Anti-Harassment Policy (III.C.1) and the Procedures for Resolving Complaints of Discrimination and Harassment. The Vice President for Ethics and Compliance is responsible for overseeing and coordinating the enforcement of policies and procedures that deal with harassment for all campuses and operations in the University system. The Office of Equity, Diversity and Inclusion monitors complaints or requests for assistance on a regular basis. In addition, the Office of Equity, Diversity and Inclusion pursues any patterns or trends that suggest areas requiring

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6 http://www.purdue.edu/policies/academic-research-affairs/ib1.html
7 http://www.purdue.edu/policies/human-resources/vid1.html
8 http://www.purdue.edu/policies/ethics/iiic2.html
9 http://www.purdue.edu/policies/ethics/iiic1.html
10 http://www.purdue.edu/policies/ethics/iiic1.html
11 https://www.purdue.edu/ethics/resources/resolving-complaints.php
remedial actions. For example, a disproportionately high number of complaints from a particular department would trigger an inquiry or investigation by the Office of Equity, Diversity and Inclusion.

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

**Veterans’ Employment Report**
The Federal Contractor Veterans’ Employment Report VETS-4212 provided on the next page is completed annually by the Office of the Vice President for Ethics and Compliance at the West Lafayette campus.
FEDERAL CONTRACTOR VETERANS’ EMPLOYMENT REPORT VETS-4212

OMB NO: 1293-0005
Expires: 03/31/2021

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 to respond to this information collection. See 38 U.S.C. § 4212(d) and “Who Must File” section of instructions.

ATTN: Human Resource/EEO Department

RETURN COMPLETED REPORT TO:
VETERANS’ EMPLOYMENT AND TRAINING SERVICE (VETS)
Service Center
In care of: Department of Labor National Contact Center (DOL-NCC)
7425 Boston Blvd
Springfield, VA 22153

TYPE OF REPORTING ORGANIZATION (Check one or both, as applicable)
[ ] Prime Contractor
[ ] Subcontractor

TYPE OF FORM (Check only one)
[ ] Single Establishment
[ ] Multiple Establishment-Headquarters
[ ] Multiple Establishment-Retirement Location
[ ] Multiple Establishment-State Consolidated (specify number of locations) (MSC)

COMPANY IDENTIFICATION INFORMATION (Limit items preprinted above-Add Company Contact information below)

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<td></td>
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<table>
<thead>
<tr>
<th>NAME OF COMPANY CONTACT:</th>
<th>TELEPHONE FOR CONTACT:</th>
<th>EMAIL:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alison Vierk</td>
<td>7654962974</td>
<td><a href="mailto:avierk@purdue.edu">avierk@purdue.edu</a></td>
</tr>
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<table>
<thead>
<tr>
<th>NAME OF HIRING LOCATION:</th>
<th>ADDRESS (NUMBER AND STREET):</th>
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<tbody>
<tr>
<td>Purdue University Northwest</td>
<td>2233 171st Street</td>
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<table>
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<tr>
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<tr>
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<table>
<thead>
<tr>
<th>INFORMATION ON EMPLOYEES</th>
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<table>
<thead>
<tr>
<th>JOB CATEGORIES</th>
<th>NUMBER OF EMPLOYEES</th>
<th>TOTAL EMPLOYEES</th>
<th>NEW HIRES (PREVIOUS 12 MONTHS)</th>
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<td>TOTAL EMPLOYEES</td>
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Report the total maximum and minimum number of permanent employees during the period covered by this report:

<table>
<thead>
<tr>
<th>Maximum Number</th>
<th>Minimum Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>677</td>
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Form VETS-4212 11/2014
Development and Execution of Programs

Monitoring of Position Specifications

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

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

Distribution of Position Announcements

Staff
Staff position vacancies are posted on the Purdue University Northwest Careers website\textsuperscript{12}. Advertisements are placed as appropriate in local, regional and national publications. Position announcements are distributed to several organizations targeting veterans and individuals with disabilities.

Faculty
The Office of Equity, Diversity and 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 Purdue University Northwest Careers website\textsuperscript{13}.

Each advertisement and search plan is reviewed to determine if it is likely to reach protected class members. When efforts appear inadequate, the Office of Equity, Diversity and Inclusion will work with the search advisory chair to find alternative strategies, including, but not limited to, contacts with colleges and universities with minority predominance, the West Lafayette Office of the Vice President for Ethics and Compliance, and/or individual networking contacts. Similar to the staff positions, faculty position announcements are also advertised with organizations targeting veterans and individuals with disabilities.

Selection Process

Staff Test Validation
The Hammond campus does not utilize testing during the applicant selection process.

Selection Procedures
Education, skills, and experience summaries have been established for the review and referral of applicants with administrative, technical, or service job interest. The summaries rely on job specification, 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.

\textsuperscript{12} \url{http://www.pnw.edu/careers}
\textsuperscript{13} \url{http://www.pnw.edu/careers}
Education of Selection Personnel
Individuals responsible for making hiring decisions are provided information and guidance related to equal employment opportunity/equal access/affirmative action compliance, effective interviewing techniques and all other related topics by Human Resources in coordination with EO/AA. Human Resources provides hiring supervisors and search chairs with an electronic employment resources toolkit to guide them throughout the search process. The Employment Manager serves as a resource to the search advisory committees for staff positions. The Office Equity, Diversity and Inclusion and Human Resources provide training and resources on equal employment opportunity requirements, interviewing techniques, and hiring procedures for hiring supervisors and search advisory committee members for faculty searches.

Adherence to Uniform Guidelines on Employee Selection
Human Resources 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.

Advertising
Advertisements for staff vacancies are prepared by Human Resources in cooperation with the hiring supervisor. Advertisements for faculty vacancies are prepared by the hiring department, in compliance with standardized University guidelines, and reviewed by the Office of Equity, Diversity and Inclusion. In compliance with the final rules, that became effective on March 24, 2014, to the VEVRAA and Section 503 of the Rehabilitation Act, the Hammond campus updated, on March 21, 2014, the EEO tagline to include veterans and individuals with disabilities. As a result all advertisements on the careers web page carry the statement: “Purdue University Northwest 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.” Additional EEO taglines listed below are used for other sources of job advertisements:

- Purdue University Northwest is an EEO/AA employer. All individuals, including minorities, women, individuals with disabilities, and protected veterans are encouraged to apply.
- PNW is an EEO/AA employer. All individuals including individuals with disabilities and protected vets are encouraged to apply.
- EOE/Vet/Disabled

The phrase “An Equal Access/Equal Opportunity University” is also used for advertising in publications pertaining to special events, programs, and activities.

The Office of Equity, Diversity and Inclusion and Human Resources staff advise and assist departments regarding wording and tone of advertisements to ensure broad base appeal.

Publications
The Office of Marketing and Communications ensures that all University publications contain the phrase “An equal access/equal opportunity University” and other appropriate nondiscrimination/affirmative action language. Identification information on compliance offices is included in designated pieces, such as the University catalog.
Social and Recreational Opportunities
All University sponsored social and recreational functions offer equal opportunity to all employees without regard to veteran status or disability. Disability accommodations contact information is included on publicity.

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

Requests for Reasonable Accommodations
The Hammond campus makes reasonable accommodations to the known physical and/or mental limitations of all otherwise qualified individuals with disabilities and/or disabled veteran status unless such accommodation would impose an undue hardship on the operation of the University. The University does not deny employment opportunities to an otherwise qualified job applicant or employee with a disability or disabled veteran status based on the need of the University to make reasonable accommodation to such an individual’s physical and/or mental impairments, and such reasonable accommodation obligation extends to the university’s use of online job application process.

As a matter of affirmative action, if an employee with a known disability, or a disabled veteran, is having significant difficulty performing his or her job and it is reasonable to conclude that the performance problem may be related to the known disability, the University will confidentially notify the employee of the performance issue and inquire whether the employee is in need of a reasonable accommodation.

The Office of Equity, Diversity and Inclusion staff work with faculty and staff to assess faculty and staff through the interactive process pursuant to the ADA and the ADA Amendments Act of 2008, and to determine the most appropriate reasonable accommodation(s) when applicable. Applicants and community members accessing University programs and services can seek reasonable accommodation assistance from the Office of Equity, Diversity and Inclusion. This office has the authority, resources, support and access that is needed to ensure the effective implementation of the reasonable accommodation procedures.

The University has developed and publicizes a written process for all employees to request a reasonable accommodation. Individuals who are employed at Purdue University Northwest, who believe they may be a person with a disability and would like to request a reasonable accommodation(s) are encouraged to complete the Reasonable Accommodation Request Form (http://www.pnw.edu/diversity/reasonable-accommodation-request-form). Upon completion of the form, the Office of Equity, Diversity and Inclusion will contact the employee to schedule a time to meet. For situations involving hidden disabilities, employees are instructed to bring the name(s), address(es), phone number(s), and fax number(s) for each health care provider to be contacted to verify the existence of a disability. Individuals are asked to complete an authorization form during the meeting granting written permission to the evaluator, to obtain medical documentation that is pertinent to their medical condition and their request for accommodation.
Data Collection and Analysis

Protected Veterans
The Hammond campus has chosen to adopt OFCCP’s current 7% hiring benchmark goal for protected veterans as opposed to calculating our own percentage goal. OFCCP’s 7% benchmark goal is not a quota which the University must meet nor is it intended to represent a floor or ceiling for the University’s recruitment of qualified protected veterans.
The Hammond campus 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:
1. The number of applicants who self-identified as protected veterans or who are otherwise known as protected veterans;
2. The total number of job openings and total number of jobs filled;
3. The total number of applicants for all jobs;
4. The number of protected veteran applicants hired; and
5. The total number of applicants hired.

Applicant and Hiring Data for Protected Veterans
For 2018-2019, the applicant and hiring data for faculty and staff positions, for the Hammond campus, consisted of the following:
- 536 applicants self-identified as protected veterans.
- There were 115 job openings and filled 109 jobs.
- The total number of applicants for all jobs was 2,639.
- The total number of protected veterans applicants hired were 8.
- The total number of applicants hired was 50.
For 2018-2019, the Hammond campus filled 16% of the positions with protected veteran(s). As a result, the Hammond campus was able to exceed its 7% hiring benchmark goal and will continue partner with organizations that target protected veterans to ensure inclusivity.

For 2017-2018, the applicant and hiring data for faculty and staff positions, for the Hammond campus, consisted of the following:
- 337 applicants self-identified as protected veterans.
- There were 101 job openings and filled 50 jobs.
- The total number of applicants for all jobs was 4,353.
- The total number of protected veterans applicants hired were 3.
- The total number of applicants hired was 109.

Individuals with Disabilities
The Hammond campus maintains data regarding the recruitment and hiring of individuals who self-identify as individuals with disabilities. The campus uses this data to evaluate the representation of individuals with disabilities in the University’s workforce. These figures are not a quota which the University must meet, nor are these figures intended to represent a floor or ceiling for the employment of individuals with disabilities on the Hammond campus. The University assesses its efforts to attain OFCCP’s 7% utilization goal for the recruitment of individuals with disabilities on an annual basis.
The Hammond campus 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:
1. The number of applicants who self-identified as individuals with disabilities or who are otherwise known to be individuals with disabilities;
2. The total number of job openings and total number of jobs filled;
3. The total number of applicants for all jobs;
4. The number of applicants with disabilities hired; and
5. The total number of applicants hired.

**Applicant and Hiring Data for Individuals with Disabilities**

For 2018-2019, the applicant and hiring data for faculty and staff positions, for the Hammond campus, consisted of the following:

- 87 applicants self-identified as individuals with disabilities.
- There were 101 job openings and filled 50 jobs.
- The total number of applicants for all jobs was 2,639.
- The total number of applicants with a disability hired was 1.
- The total number of applicants hired was 50.

For 2018-2019, 2% of the positions were filled with individuals with disabilities. Thus, the Hammond campus did not meet the 7% utilization goal for the recruitment of individuals with disabilities for 2018-2019.

For 2017-2018, the applicant and hiring data for faculty and staff positions, for the Hammond campus, consisted of the following:

- 192 applicants self-identified as individuals with disabilities.
- There were 122 job openings and filled 109 jobs.
- The total number of applicants for all jobs was 4,353.
- The total number of applicants with a disability hired was 3.
- The total number of applicants hired was 109.
Special Initiatives

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

1. The Office of Equity, Diversity and Inclusion staff provide assistance in developing appropriate workplace accommodations.
2. The American Sign Language (ASL) Club offers “silent lunches” for faculty, staff, students and the community to communicate and practice ASL skills. In addition, the ASL Club hosts several other events to include the following: ASL Silent Dinners, ASL Silent Tea, ASL Coffeehouse events, ASL Game Night, and ASL Fun Night. The ASL events typically offer the participants the opportunity to engage in games, activities, performances, and presentations.
3. The Westville campus has videophones in the following locations: TECH Building Room 177, TECH Building Room 359, TECH Building Room 265, and the LSF Building Room 114. The Hammond campus has videophones located in the following locations: Student Union and Library Building, room 203 (within the library), Anderson 141, Gyte 213, Gyte 215, Griffin Hall, 2nd Floor Lounge. The videophones allow individuals who are deaf or hard of hearing to place or receive calls and allow hearing individuals to place or receive calls with those who are deaf or hard of hearing.
4. Purdue University Northwest participates in the Workforce Recruitment Program (wrp.gov). This program is a recruitment and referral program that connects federal and private sector employers nationwide with college students and recent graduates with disabilities. It is led by Purdue University Northwest’s Career Center.
5. The Bender Virtual Career Fair is a virtual career fair that Purdue University Northwest participates in annually. This is the fifth year of participation. The virtual career fair was promoted on social media to students, individuals with disabilities and veterans by Purdue University Northwest’s Career Center.
6. The Service Learning class in Education has worked with several organizations that serve individuals with disabilities in Northwest Indiana including Opportunity Enterprises on strategies for early childhood education intervention for special needs.
7. Assistive Technology including JAWS, Magic, Kurzweil, and Dragon are available on computer labs within the library on each campus.
8. Several campus forums have been closed captioned to enhance the accessibility of the communication.
9. The Human Resources Department has an active outreach program to recruit individuals who have been traditionally underrepresented in our workforce.
10. 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.
11. The Purdue University Northwest AccessAbility Committee, reports directly to the Chancellor and is chaired by the Vice Chancellor of Information Services. The Chancellor’s AccessAbility Committee is charged with reviewing and advising the PNW Chancellor on matters regarding Americans with Disabilities Act (ADA) accessibility and all related needs and issues at PNW. The Committee conducted a campus-wide survey to assess accessibility needs and concerns.
12. The Office of Equity, Diversity, and Inclusion reviews the Affirmative Action Plans with the Vice Chancellors and Deans annually.
13. The Office of Equity, Diversity, and 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.
14. Purdue University Northwest Veteran Services 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. Veteran Services works with community colleges and veteran services to provide opportunities that will make the transition to the academic environment smoother. 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. Veteran Services is located on the Westville campus in the Leonard J. Brown Veterans Lounge Dworkin Student Services and Activities Complex and in the Student Union and Library Building, room 335 on the Hammond Campus. Veteran Services connects student veterans to campus and community resources.

15. The Veteran hosted a PNW Veterans Ball in celebration of Veterans Day.

16. The Veteran reestablished the PNW Student Veterans of America Chapter and the PNW Veterans Honor Society also known as SALUTE.

17. The Veteran developed and implemented a faculty and staff training program called Green Zone training that helps create a more inviting and understanding campus.

18. The Veteran developed an informational USB provided to all incoming veterans to promote local and on campus resources as well as provide directions and information regarding all VA benefits.

19. The Veteran Centers on both campuses were redesigned to accommodate more veterans and help better suite their needs.

20. Purdue University Northwest participated in Northwest Indiana’s Annual Stand Down for the seventh straight year. Stand Down is part of a national initiative to assist local military personnel, veterans, and their families connect with valuable services such as legal aid, education, counseling, health screenings and medical services, as well as attain information about employment, substance abuse treatment, the Veterans Administration and Social Security benefits. 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 included a flag raising ceremony and a Veteran’s breakfast at both locations with remarks from Retired Colonel Richard Ligon at the Westville location and Professor Tony Sandone, Professor of Finance and Economic Development and the Director of the Center for Economic Development and Research, Retired Air Force U.S.A.F. / Active Duty from 1973 – 1979 and S.A.F. Reserves until 1985 at the Hammond location. The office of Veteran’s services hosted pen houses at both the Westville and Hammond locations to share information about Veteran Services to the University community.

21. The Disability Access Center collaborated with the Office of Instructional Technology to present Multi-Method (M & M) Monday. M & M Monday provide faculty and staff with information to reach all learners at Purdue University Northwest. More specifically, M & M Monday provides weekly tips and tutorials for the University community to utilize in order to learn how to make digital content accessible for individuals with disabilities.

22. Purdue University Northwest has employed individuals with professional expertise to ensure the web accessibility standards required by the Purdue Electronic Information, Communication and Technology Accessibility Standard and applicable federal laws are met.

23. Web accessibility remains a primary concern for Purdue University Northwest. The campus continues to adhere to the Purdue Electronic Information, Communication and Technology Accessibility Standard, adopted in June 2017, requiring that all online content meet the Web Content Accessibility Guidelines (WCAG) 2.0 Level AA, and the Guidance on Applying WCAG 2.0 to Non-Web Information and Communications Technologies (WCAG2ICT). Progress toward achieving and maintaining fully accessible web pages is documented in an annual status report submitted to the Office of Equity, Diversity, and Inclusion.

24. Web pages, documents and videos posted online are audited periodically 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 are required to take the training annually.
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.

25. 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. The Office of Instructional Technology works with the individual colleges and departments to address the accessibility of instructional course materials, such as syllabi and videos in the learning management system.

26. The Diversity and Inclusion Awareness training is being revised to be inclusive of the Hammond and Westville campuses and every Purdue University Northwest employee will be 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.

27. To request a disability-related accommodation, please contact the Office of Equity, Diversity and Inclusion at edi@pnw.edu or (219) 989-2163 for the Hammond Campus or (219) 785-5545 for the Westville Campus.