



PURDUE UNIVERSITY NORTHWEST

AFFIRMATIVE ACTION PLAN



for Protected
Veterans
and Individuals
with Disabilities

October 2023 - September 2024
Westville Campus

November 15, 2023

Dear Members of the Purdue University Community,

As president of Purdue University, it is my responsibility and privilege to reaffirm the university's unwavering commitment to Equal Opportunity, Equal Access, and Affirmative Action – all the principles as stated in the university policy of the same name. In making this statement, I echo the action of the Board of Trustees at its meeting on January 21, 1970:

The University is committed to maintaining an inclusive 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 variety among its many members strengthens the institution, stimulates creativity, promotes the exchange of ideas, and enriches campus life.

Acts of discrimination against any individual or group are wrong because they foster intolerance, incivility, and intimidation. The University does not condone and will not tolerate discrimination, harassment or intimidation of any individual in the University community for any reason. The University, through its actions, seeks to assure all its members of their rights to protections from the harmful effects of discrimination. . . . [The] University promotes the full realization of equal employment opportunity through its affirmative action program.

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

In the half century since those words were affirmed by the Board of Trustees, the ideals on which they are based have been built upon with the issuance of the Nondiscrimination Policy Statement and several amendments. Purdue University prohibits 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. Because Purdue is a federal government contractor, we must develop and maintain a written affirmative action program regarding our employment practices.

The university's written affirmative action plans are updated and published on an annual basis. Each year, Purdue publishes the Affirmative Action Plan for Minorities and Women as well as the Affirmative Action Plan for Veterans and Individuals with Disabilities. The Executive Vice Presidents, Vice Presidents, Vice Provosts, Deans, Directors, and Heads of units are responsible for promoting equal employment opportunity and for making good faith efforts to achieve equal employment opportunity.

Purdue University's affirmative action program does not relate in any manner to the admission of students. Anyone seeking information regarding affirmative action in employment should consider reviewing the U.S. Department of Labor, Office of Federal Contract Compliance Program's website. Anyone seeking information concerning Purdue's Affirmative Action Programs should contact the Office of the Vice President for Ethics and Compliance by telephone, 765-494-5830, or by email, compliance@purdue.edu. The Office of the Vice President for Ethics and Compliance is located on the 10th floor of Ernest C. Young Hall, 155 S. Grant Street, West Lafayette, Indiana.

The Purdue community includes students, faculty, and staff from so many different backgrounds. We will continue to create a welcoming and supportive environment for all.

Ever grateful, ever true,



Mung Chiang
President

Roscoe H. George Distinguished Professor of Electrical and Computer Engineering

November 15, 2023

To All Members of the Purdue University Community:

The success of Purdue University's affirmative action program and policies of equal access and equal employment opportunity is dependent upon each of us. As Purdue's Equal Opportunity Officer, I have direct responsibility for ensuring that our equal access and equal opportunity employment policies are followed and the Affirmative Action Plans are implemented in good faith in accordance with the requirements of Executive Order 11246, as amended, the Rehabilitation Act of 1973, as amended, and 38 U.S.C. Section 4212, as well as the implementing regulations of each.

The University believes that adherence to its Affirmative Action Plans will enable our faculty, staff, and students to live and work in an inclusive environment. These Affirmative Action Plans cover policies and procedures necessary to make this happen, which include the following:

- ensuring that all employment decisions, including recruitment, hirings, terminations, promotions, and training, are made in accordance with federal and state laws, regulations and orders 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;
- maintaining an environment where applicants and employees are not subject to discrimination, harassment, intimidation, threats, or coercion if they file a complaint, assist or participate in an investigation or any other activity related to the administration of these Plans, oppose any act or practice prohibited by the laws and regulations that govern these Plans, or exercise any other rights protected under the Plans' governing laws and regulations;
- educating employees and meeting regularly with supervisors and search committees regarding our equal access/equal employment opportunity and affirmative action policies; and
- distributing information about equal access/equal opportunity employment and affirmative action policies.

My department audits and monitors procedures, practices, and progress toward our goals and reports potential problems to me. The University will investigate circumstances of possible discrimination or harassment and will take appropriate action to correct any problems that may exist.

Thank you for your continued support of Purdue's quest for academic excellence and equitable treatment of all members of the Purdue community.

Very truly yours,



Alysa Christmas Rollock
Vice President for Ethics and Compliance



PURDUE UNIVERSITY NORTHWEST

Office of the Chancellor

November 2023

To All Members of the Purdue University Northwest Community:

Purdue University Northwest (PNW) is proud to be one of the most diverse public institutions of higher learning in the state of Indiana. PNW's undergraduate student population, as of fall 2023, includes more than 25% Hispanic students and over 11% Black or African American students. PNW is an emerging Hispanic-Serving Institution and anticipates future designation by the U.S. Department of Education.

As a premier metropolitan university serving an increasingly diverse student population, we are committed to creating an inclusive and welcoming environment on our campuses that encourages the development of new ideas, innovation, and discovery by understanding and celebrating the unique backgrounds of every person in our university community.

To further promote diversity university-wide through affirmative action and equal employment opportunity, we are disseminating Purdue University Northwest's Affirmative Action Plan. The plan describes the policies and procedures that members of PNW's faculty and staff on both campuses will follow in meeting legal and ethical affirmative action responsibilities.

The plan is available through the website of the Office of Institutional Equity, and in hard copy in Room 218 of Lawshe Hall on the Hammond Campus and Schwarz Hall Room 160 on the Westville Campus.

While vice chancellors, deans, directors and department chairs are responsible for the personnel practices of their units, all faculty and staff members are expected to be aware of Purdue Northwest's commitment to affirmative action, and to promote it in appropriate circumstances.

Each of us shares in the responsibility of making our campuses vibrant and welcoming with ongoing dialogue, programming, and activities that celebrate diversity of race, gender, culture, and identity. When we, as Purdue Northwest, are committed to inclusivity, recognizing the treasures and inherent worth of every person, we foster among ourselves, our students and our community the sensitivity and mutual respect required to enable each person to reach his or her potential.

Sincerely,

A handwritten signature in black ink that reads "Thomas L. Keon". The signature is fluid and cursive, with a large, sweeping initial 'T'.

Thomas L. Keon
Chancellor

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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](#)¹. Individuals external to the University are able to access the plan via the web as well. Electronic copies of the plan are distributed to the Chancellor, Vice Chancellors, and College Deans. Additionally, the library has a hard copy of the plan, which is accessible for faculty, staff, students, and the community. Individuals may also access the plan at the Office of Institutional Equity in Schwarz Hall Room 160 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 on both Purdue Northwest campuses. The Office of the Vice President for Ethics and Compliance on the West Lafayette campus supports the Affirmative Action Plan for Purdue system-wide.

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 believes that s/he is an individual with a disability and/or a protected veteran. The University maintains all information on self-identification confidential.

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

(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 Opportunity Employment

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

A person 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 a position.

Protected Veteran

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

Reasonable Accommodation

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

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

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 in pdf format [online](#)².

At its meeting on January 21, 1970, the Board of Trustees reaffirmed and reinforced Purdue University's general policy of equal opportunity by approving a statement of policy and responsibility:

“The 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, the University seeks to develop and nurture diversity. The University believes that variety among its many members strengthens the institution, stimulates creativity, promotes the exchange of ideas, and enriches campus life.

Acts of discrimination against any individual or group are wrong because they foster intolerance, incivility, and intimidation. The University does not condone and will not tolerate discrimination, harassment or intimidation of any individual in the University community for any reason. The University, through its actions, seeks to assure all its members of their rights to protections from the harmful effects of discrimination.

To meet its commitment under federal and state laws, the University also promulgates policies and programs to ensure that all persons have equal access to its educational programs, employment opportunities, facilities, and all other University activities without regard to race, religion, sex, color, national origin, ancestry, disability, status as

a Vietnam era veteran, or age. Additionally, the University promotes the full realization of equal employment opportunity through its affirmative action program.

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 preceding policy has been implemented through a number of actions, including issuance of Purdue University’s Nondiscrimination Policy Statement³ and the issuance of the Equal Opportunity, Equal Access and Affirmative Action Policy (III.C.2)⁴, most recently revised August 1, 2021. These policies can be accessed through the Office of Institutional Equity website.⁵

The University prohibits 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. 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.⁶

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](#)⁷; [Purdue Today](#)⁸; and the [Office of Institutional Equity website](#)⁹. 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 orientations include an overview of equal employment opportunity/equal access/affirmative action (EEO/EA/AA) policies and procedures. In addition, faculty and staff are provided with information on how to access the University's Equal Access and Equal Opportunity [policies and procedures](#)¹⁰.

The Office of Institutional Equity 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. Faculty advertisements and postings are reviewed by the Office of Institutional Equity 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.

External Dissemination

Advertisements and Notices

The Office of Institutional Equity 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 EOE/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 [Purdue University Policy Office website](#)¹¹. The [Office of Marketing and Communications](#)¹² 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. Its 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), Kevin Boes, JoAnn Brouillette, Theresa Carter, Vanessa Castagna, Malcolm DeKryger, Michael Klipsch, Gary J. Lehman (Vice Chairman), and Shawn A. Taylor.

Executive Staff, Line Management, and Supervisors

Dr. Mung Chiang, President of Purdue University, assumes full responsibility for the successful implementation of the University's Equal Employment Opportunity Policy and the Affirmative Action Plan for the West Lafayette campus.

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 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 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 Purdue Northwest campuses.

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 Office of Institutional Equity at both the Purdue Northwest campuses.

Laura Odom, the Executive Director of the Office of Institutional Equity reports directly to Chancellor Keon and is responsible for developing, executing, and monitoring the Affirmative Action Plan for the Purdue Northwest campuses.

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 Institutional Equity 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 Institutional Equity 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 accommodation(s).
- 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 Institutional Equity 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, and local Veterans Services offices.

Review of Sources

The Office of Institutional Equity 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 Institutional Equity 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 use various methods of collecting data, 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)¹³.

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 procedures¹⁴.

All employees bringing complaints alleging discrimination are processed pursuant to the Equal Opportunity, Equal Access and Affirmative Action Policy (III.C.2)¹⁵. 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 Harassment¹⁶ available online. In these cases, the Office of Institutional Equity will participate in investigating and resolving the issue.

Complaints alleging harassment are processed in accordance with the Anti-Harassment Policy (III.C.1)¹⁷, the Procedures for Resolving Complaints of Discrimination and Harassment¹⁸, and the Title IX Harassment Policy (III.C.4)¹⁹. 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 Institutional Equity monitors complaints or requests for assistance on a regular basis.

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

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 is completed annually by the Office of the Vice President for Ethics and Compliance at the West Lafayette campus.

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 of Institutional Equity 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](#)²⁰. 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 Institutional Equity 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](#)²¹.

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 Institutional Equity 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

Purdue University Northwest 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.

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 of Institutional Equity 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 Institutional Equity.

In compliance with the final rules, that became effective on March 24, 2014, to the VEVRAA²² and Section 503 of the Rehabilitation Act²³, Purdue Northwest 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 EOE/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 taglines listed below are used for other sources of job advertisements:

- Purdue University Northwest is an EOE/AA employer. All individuals, including minorities, women, individuals with disabilities, and protected veterans are encouraged to apply.
- PNW is an EOE/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 Institutional Equity 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 of Institutional Equity, 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

Purdue University Northwest 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 an 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 Institutional Equity works with faculty and staff through the interactive process pursuant to the ADA and the ADA Amendments Act of 2008, 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 Institutional Equity. 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 Form²⁴. Upon completion of the form, the Office of Institutional Equity 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

Purdue Northwest has chosen to adopt OFCCP's current 5.4% hiring benchmark goal for protected veterans as opposed to calculating our own percentage goal. OFCCP's 5.4% 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.

Purdue 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:

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 the period of 2022-2023, the applicant and hiring data for faculty and staff positions, for Purdue Northwest, consisted of the following:

- 83 applicants self-identified as protected veterans.
- There were a total of 298 job openings, of which 289 were filled.
- There were a total of 4,803 applicants for all jobs.
- The total number of protected veterans applicants hired was 4.
- The total number of applicants hired was 289.

For 2022-2023, Purdue Northwest filled 1.38% of the positions with protected veteran(s). Thus, Purdue Northwest did not meet the 5.4% benchmark goal for the recruitment of protected veterans for 2022-2023.

Individuals with Disabilities

Purdue Northwest 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 at Purdue Northwest. The University assesses its efforts to attain OFCCP's 7% utilization goal for the recruitment of individuals with disabilities on an annual basis.

Purdue 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:

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 the period of 2022-2023, the applicant and hiring data for faculty and staff positions, for Purdue Northwest, consisted of the following:

- 380 applicants self-identified as individuals with disabilities.
- There were a total of 298 job openings, of which 289 were filled.
- There were a total of 4,803 applicants for all jobs.
- The total number of individuals with disabilities applicants hired was 31.
- The total number of applicants hired was 289.

For 2022-2023, Purdue Northwest filled 10.7% of the positions with individuals with disabilities. Thus, Purdue Northwest met and exceeded the 7% utilization goal for the recruitment of individuals with disabilities for 2022-2023.

Special Initiatives

Purdue University Northwest provides additional support for its affirmative action program through campus activities designed to raise awareness of equal employment opportunities for veterans and individuals with disabilities. Faculty and staff are also encouraged to participate in similar activities provided system-wide. Standard practice at Purdue Northwest for all campus community event advertisements is to include an invitation that reads: "To request a disability-related accommodation, please contact the Office of Institutional Equity at oiie@pnw.edu or (219) 989-2163 five days prior to the event."

The following list of events and initiatives is not exhaustive but can be considered representative.

- The Office of Institutional Equity staff provides assistance in developing appropriate workplace accommodations.
- The Westville campus has videophones in the following locations: Technology Building (TECH), rooms 177 and 359, Dworkin Student Services and Activities Complex (DSAC), room 1007 and the Library Student Faculty Building (LSF), room 114. The Hammond campus has videophones located in the following locations: Student Union and Library Building (SULB), room 203 (within the library), Gyte Building, rooms 213 and 215, and 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.
- Assistive software is available on computers within the library on each campus.

- Several campus forums in a virtual format have been closed-captioned to enhance the accessibility of the communication. When forums or presentations are streamed, live on the web, captioning (CART) services are provided routinely, and the transcripts are synced with the video recording when it is posted. The Office of Instructional Technology (OIT) 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.
- Human Resources has added the following advertising sources to assist in recruiting veterans and individuals with disabilities.
 - City of East Chicago Department of Planning & Economic Development
 - Gary NAACP
 - Urban League of Northwest Indiana
 - Veterans Services Porter County Indiana
 - Veterans Services LaPorte County Indiana
 - WorkOne
- The Office of Institutional Equity reviews the Affirmative Action Plans with the Vice Chancellors and Deans annually.
- The Office of Institutional Equity 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.
- Purdue University Northwest Veteran Services strives to create a community of university personnel, students, and local organizations that provide support and resources to veterans, active duty service members, and their dependents to meet their educational goals. Veteran Services works with community colleges and regional veteran organizations to provide programming that makes the veteran transition to the academic environment successful and stress-free. 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 Dworkin Student Services and Activities Complex and in room 335 of the Student Union Library Building at the Hammond Campus. Veteran Services connects student veterans to campus and community resources.
- Veteran Services hosts an annual Veterans Ball on PNW campuses in celebration of Veterans Day.
- The PNW Veteran Services Office hosts a faculty and staff training program called Green Zone training that helps create a more inviting and understanding campus.
- Veteran Centers on both campuses provides comfortable furnishings, computers, free printing, as well as a stocked kitchen nook creating a USO style destination.
- 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.

- During the Spring semester Veteran Services Host a Student Veteran Alumni and Graduate dinner and awards a Student Veteran of the Year, Student Veteran Supporter of the year, and Veteran Alumni of the Year.
- The Office of Instructional Technology (OIT) provides training to all employees about basic accessibility guidelines. For assistance on how to create accessible documents and make files accessible, employees can access [tutorial guides and videos online](#).²⁵ Benefits-eligible faculty and staff can also access many self-paced LinkedIn Learning courses via PNW's [HR Employee Learning and Development page](#).²⁶
- Purdue Northwest campuses continue to adhere to the [Electronic Information, Communication and Technology Accessibility Standard](#)²⁷, 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).
- 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 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.

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- ¹ <https://www.pnw.edu/office-institutional-equity/affirmative-action-plan/>
- ² https://www.purdue.edu/ethics/Affirmative_Action/FederalStateLawsExecutiveOrdersupdate.pdf
- ³ https://www.purdue.edu/purdue/ea_eou_statement.php
- ⁴ <https://www.purdue.edu/policies/ethics/iic2.html>
- ⁵ <https://www.pnw.edu/oie>
- ⁶ Nondiscrimination Policy Statement: https://www.purdue.edu/home/ea_eou_statement/
- ⁷ http://www.purdue.edu/faculty_staff_handbook/
- ⁸ <https://www.purdue.edu/newsroom/purduetoday/>
- ⁹ <https://www.pnw.edu/oie>
- ¹⁰ <https://www.purdue.edu/policies/ethics/iic2.html>
- ¹¹ <https://www.purdue.edu/policies/index.html>
- ¹² <https://www.pnw.edu/news/>
- ¹³ <http://www.purdue.edu/policies/academic-research-affairs/ib1.html>
- ¹⁴ <http://www.purdue.edu/policies/human-resources/vid1.html>
- ¹⁵ <http://www.purdue.edu/policies/ethics/iic2.html>
- ¹⁶ <https://www.purdue.edu/ethics/resources/resolving-complaints.php>
- ¹⁷ <http://www.purdue.edu/policies/ethics/iic1.html>
- ¹⁸ <https://www.purdue.edu/ethics/resources/resolving-complaints.php>
- ¹⁹ <https://www.purdue.edu/policies/ethics/iic4.html>
- ²⁰ <https://careers.purdue.edu/PNW>
- ²¹ <https://careers.purdue.edu/PNW>
- ²² <https://www.dol.gov/agencies/ofccp/vevraa>
- ²³ <https://www.dol.gov/agencies/ofccp/section-503/law>
- ²⁴ https://purdue.ca1.qualtrics.com/jfe/form/SV_afSchsUoUM37IWt?Q_JFE=qdg&_ga=2.119317321.1342583991.1603133474-1163669441.1603133474
- ²⁵ <https://www.pnw.edu/information-services/services/accessibility/>
- ²⁶ <https://www.pnw.edu/human-resources/employee-learning-and-development/>
- ²⁷ <http://www.purdue.edu/policies/information-technology/s5.html>



PURDUE UNIVERSITY NORTHWEST

Office of Institutional Equity

Lawshe Hall 218
2202 169th St
Hammond, IN 46323
219-989-2337

Schwarz Hall 160
1401 S. U.S. 421
Westville, IN 46391
219-785-5545



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**Purdue University Northwest is an EOE/AA employer.
All individuals, including minorities, women, individuals with
disabilities, and veterans are encouraged to apply.**

