EXECUTIVE ORDER 11246 AFFIRMATIVE ACTION PLAN (AAP)

for

CALIFORNIA STATE UNIVERSITY, LOS ANGELES
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January 1, 2014 – December 31, 2014

Dun’s #: 08-497-5452
EIN (tax) #: 95-4386558

PART I: AAP FOR MINORITIES AND WOMEN

PART II: AAP FOR COVERED VETERANS
AND PERSONS WITH DISABILITIES

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INTRODUCTION TO PARTS I AND II

BACKGROUND

California State University, Los Angeles is a publicly owned University within the California State University (CSU) system, which offers excellent and innovative educational opportunities to an urban student population that reflects the diversity of the Los Angeles basin. Educational opportunities include: 1) preparing students to appreciate, engage, enhance and transform the social, cultural, civic, and workplace structures of American and global societies; 2) providing students with capabilities, skills, and opportunities to take full advantage of lifelong learning, including graduate and professional studies, and opportunities to participate in research, scholarly, and creative activities; 3) offering students tools for personal and academic achievement, economic mobility, and healthier lives; 4) serving as a gateway among the California State University, Los Angeles community, the greater Los Angeles community, and word community for shared educational and cultural life; and 5) providing high quality professional services to all constituencies of the University.

The University was founded in 1947.

Affirmative Action is a term that encompasses any measure adopted by an employer to correct or to compensate for past or present discrimination or to prevent discrimination from recurring in the future. Affirmative Action goes beyond the simple termination of a discriminatory practice.

As stipulated in federal regulations, a prerequisite to the development of a satisfactory AAP is the evaluation of opportunities for protected group members, as well as an identification and analysis of problem areas inherent in their employment. Also, where a statistical analysis of the employee workforce reveals a numeric disparity between incumbency and availability of minorities or women, an adequate AAP details specific affirmative action steps to guarantee equal employment opportunity. These steps are keyed to the problems and needs of protected group members. For minorities and women, such steps include the development of hiring and promotion goals to rectify the disparity between incumbency and availability. It is toward this end that the following AAP of California State University, Los Angeles was developed.

APPLICABLE AFFIRMATIVE ACTION LAWS AND REGULATIONS

California State University, Los Angeles’ AAP for minorities and women (Part I) has been prepared according to Executive Order No. 11246, as amended, and Title 41, Code of Federal Regulations, Part 60-1 (Equal Employment Opportunity Duties of Government Contractors), Part 60-2 (Affirmative Action Programs of Government Non-Construction Contractors; also known as "Revised Order No. 4"), and Part 60-20 (Sex Discrimination Guidelines for Government Contractors).

The Veterans Employment Opportunities Act of 1998 (VEOA), Public Law 105-339, effective October 31, 1998, increased the threshold for coverage under VEVRAA from a contract of $10,000, or more to a contract of $25,000 or more; extended the law’s protections to “veterans who served on active duty during a war or in a campaign for which a campaign badge was authorized; and, provides temporary (up to one year) protection to veterans who do not have a service connected disability, did not see action in a foreign war and did not serve during the Vietnam era.”

The Jobs for Veterans Act (JFVA), Public Law 107-288, effective December 1, 2003, increased the threshold for coverage under 38 U.S.C. §4212 from $25,000 to $100,000; grants VEVRAA protection to those veterans who, while serving on active duty in the Armed Forces, participated in a United States military operation for which an Armed Forces service medal was awarded pursuant to Executive Order 12985 (62 Fed. Reg. 1209); changes the definition of “recently separated veteran” to include “any veteran during the three-year period beginning on the date of such veteran’s discharge or release from active duty”; changes “Special Disabled Veterans” to “Disabled Veterans,” expanding the coverage to conform to 38 U.S.C. § 4211 (3); and, following publication of the final regulations, requires contractors to post job listings with their local employment service delivery system.

**PROTECTED GROUPS**

Coverage under affirmative action laws and regulations applies to:

- Women and minorities who are recognized as belonging to or identifying with the following race or ethnic groups: Blacks/African Americans, Hispanics/Latinos, Asians/Pacific Islanders, and American Indians/Alaskan Natives.

- Any veteran 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 who was discharged or released from active duty because of a service-connected disability.

- Recently separated veterans: any veteran currently within three years of discharge or release from active duty.

- Veterans who received an “Armed Forces Medal.”

- Other protected veterans 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 then Department of Defense.

An individual with a disability: 1) a person who has a physical or mental impairment that substantially limits one or more of his/her major life activities; (2) has a record of such impairment, or (3) is regarded as having such an impairment.

PROGRAM TERMINOLOGY

The terms, "comparison of incumbency to availability," "deficiency," and "problem area," appearing in this AAP, are terms California State University, Los Angeles is required by government regulations to use. The criteria used in relation to these terms are those specified by the government. These terms have no independent legal or factual significance whatsoever. Although California State University, Los Angeles will use the terms in total good faith in connection with its AAP, such use does not necessarily signify that the University agrees that these terms are properly applied to any particular factual situation and is not an admission of non-compliance with EEO laws, regulations, and objectives.

The comparison of incumbency to availability contained herein is required by government regulations to be based on certain statistical comparisons. Geographic areas and sources of statistics used herein for these comparisons were used in compliance with government regulations, as interpreted by government representatives. The use of certain geographic areas and sources of statistics does not indicate California State University, Los Angeles’ agreement that the geographic areas are appropriate in all instances of use or that the sources of statistics are the most relevant. The use of such geographic areas and statistics may have no significance outside the context of this AAP. Such statistics and geographic areas will be used; however, in total good faith with respect to this AAP.

The grouping of job titles into a given job group does not suggest that California State University, Los Angeles believes the jobs so grouped are of comparable worth.

Whenever the term "goal" is used, it is expressly intended that it "should not be used to discriminate against any applicant or employee because of race, color, religion, gender, or national origin," as stated in Title 41 Code of Federal Regulations, Part 60-2.16(e)(2).

This AAP is not intended to create any contractual or other rights in any person or entity.

RELIANCE ON EEOC’S GUIDELINES

Although California State University, Los Angeles does not believe any violation of Title VII of the Civil Rights Act exists, it has developed this AAP in accordance with and in reliance upon the EEOC's Guidelines on Affirmative Action, Title 29 Code of Federal Regulations, Part 1608.

REPORTING PERIOD
This AAP is designed to cover the following reporting period,

- AAP implementation period: **January 1, 2014 – December 31, 2014**
- Transaction period: **November 1, 2012 – October 31, 2013**
STATEMENT OF PURPOSE FOR PARTS I AND II

This AAP has been designed to bring women and men, members of minority groups, covered veterans, and persons with disabilities into all levels and segments of California State University, Los Angeles’ workforce in proportion to their representation in the qualified relevant labor market.

The AAP, therefore, is a detailed, results-oriented set of procedures which, when carried out, results in full compliance with equal employment opportunity requirements through the equal treatment of all people.

The manner in which this is to be accomplished becomes technical and somewhat complicated. There are several reasons for this. First, California State University, Los Angeles is subject to and must address a variety of state and federal laws and guidelines dealing with equal employment opportunity and affirmative action. These guidelines and requirements are in themselves somewhat technical and complex. In addition, relevant court decisions, which are often useful in interpreting, but sometimes conflicting with these requirements and guidelines, must be taken into account when developing and implementing the AAP. Furthermore, in determining California State University, Los Angeles’ current equal employment opportunity and affirmative action position and its desired future achievements, numbers, percentages, statistics, and numerous calculations and computations must come into play.

The technical, legal, and mathematical aspects of the AAP; however, all have one common purpose: to allow the University to properly identify three key concepts:

1. Where we stand now,
2. Where we must go, and
3. How best to get there.

These three concepts are the Affirmative Action Plan.
CALIFORNIA STATE UNIVERSITY, LOS ANGELES

PART I: AFFIRMATIVE ACTION PLAN FOR MINORITIES AND WOMEN

FOR

JANUARY 1, 2014 – DECEMBER 31, 2014
# PART I

**AAP FOR MINORITIES AND WOMEN**

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PART I: AAP FOR MINORITIES AND WOMEN

CHAPTER 1: ORGANIZATIONAL PROFILE

41 C.F.R. § 60-2.11

Workforce Analysis/Lines of Progression

California State University, Los Angeles conducted a workforce analysis to identify employees by gender and race/ethnicity in each job title. The data was collected from payroll records dated November 1, 2013.

Job titles are listed by organizational unit. Job titles are listed from lowest to highest paid. The list includes all job titles, including departmental supervision, exempt, and nonexempt titles.

For each job title, California State University, Los Angeles identified the total number of employees, the number of male and female employees, the total number of minority employees, the male and female minority employees, the total number of employees who are White, Black, Hispanic, Asian, American Indian or Alaskan Native employees, Native Hawaiian or Pacific Islander, and Two or More races, and the male and female employees within each of these race/ethnic groups.

Lines of Progression

Developed in conjunction with the workforce analysis is information on California State University, Los Angeles’ lines of progression. Lines of progression (career ladders/career paths) identify the job titles through which an employee can move to the top of a line. For each line of progression, applicable departments are identified. These are the departments which employ persons in the job titles in the specified line of progression. Some lines of progression are limited to only one department, while others are found throughout several departments.

The lines of progression provide useful information regarding patterns of vertical and horizontal movement throughout our workforce. These patterns will be evaluated to ascertain whether they provide to our employees the optimum career mobility and opportunities for advancement.

See the Workforce Analysis/Lines of Progression for the results per organizational unit.
Although the workforce analysis was conducted individually for every job title, after it was completed, job titles were grouped for the comparison of incumbency to availability and for setting goals. There were several reasons for grouping jobs.

Many job titles are so similar in content that handling them individually in the AAP is not necessary. Grouping together these very similar titles is appropriate for the comparison of incumbency to availability. For many job titles, the availability data that can be collected is limited, and the same data must be used for several related jobs. Therefore, grouping these related titles together is logical. Also, many job titles have so few incumbents in them that identifying disparities between incumbency and availability by job title is meaningless—as problem areas would be identified in terms of fractions of people. By grouping several similar titles and increasing the number of employees involved, a meaningful comparison can be conducted; any identified problem areas are more likely to be in terms of whole people. Consequently, goals established to correct problem areas are also more likely to be in terms of whole people.

The three reasons for grouping job titles all discuss "similar" or "related" jobs. That is the most critical guideline in creating job groups. Above all, the job titles placed into a job group must be more similar or related to each other than the job titles in other job groups.

Job groups must have enough incumbents to permit meaningful comparisons of incumbency to availability and goal setting. Ideally, if a job group is identified as containing a problem area, it should be large enough that a goal of at least one whole person can be established. No minimum size has been established for this purpose; however, since it is dependent not only on the size of the job group, but also on the size of the availability percentage and the number of minorities or women already employed in the job group.

It may not be possible for a smaller contractor's job groups to meet the guideline of not crossing EEO categories. While there are usually two or more job groups within each EEO-1 or EEO-6 category, for smaller contractors some or all of their job groups may correspond to EEO categories.

California State University, Los Angeles did not combine job titles with different content, wages, or opportunities if doing so would have obscured problem areas (e.g., job groups which combine jobs in which minorities or women are concentrated with jobs in which they are underrepresented).
CHAPTER 3: PLACEMENT OF INCUMBENTS IN JOB GROUPS
41 C.F.R. § 60-2.13

Each job group appears on a Job Group Report with a job group name and number. The report lists each job title in the job group. For each job title, the worksheet provides the following information: EEO reporting category, job title, employee headcounts for each job title, and overall percentages by gender and race/ethnicity as of November 1, 2013.

See the Job Group Analysis for the listing of the job titles and the associated race and gender headcounts per job group.
"Availability" is an estimate of the proportion of each sex and race/ethnic group available and qualified for employment at California State University, Los Angeles, for a given job group in the relevant labor market during the life of the AAP. Availability indicates the approximate level at which each race/ethnic and sex group could reasonably be expected to be represented in a job group if California State University, Los Angeles’ employment decisions are being made without regard to gender, race, or ethnic origin. Availability estimates, therefore, are a way of translating equal employment opportunity into concrete numerical terms. Correct comparisons of incumbency to availability, worthwhile and attainable goals, and real increases in employment for problem groups depend on competent and accurate availability analyses. With valid availability data, we can compare the percentages of those who could reasonably be expected to be employed versus our current employment (from the workforce analysis), identify problem areas or areas of deficiency, and establish goals to correct the problems.

Steps in Comparison of Incumbency to Availability

Identify Availability Factors

The following availability factors are required of federal government contractors for consideration when developing availability estimates for each job group:

1. External Factor: The external requisite skills data comes from the 2010 Census of Population.
   a. Local labor area: Residential Zip Code
   b. Reasonable labor area: National

See the Zip Code Analysis report for the counties included in the local labor area.
Note: Zip code analysis results only apply to job groups where populated census data is available.

2. Internal Factor: The percentage of minorities or women among those promotable, transferable, and trainable within the contractor’s organization. See the Internal Availability Analysis for more detail.

Assign Internal and External Factor Weights: Weights were assigned to each factor for each job group. A combination of historical data and experience were used to determine the weights. Weights were never assigned in an effort to hide or reduce problem areas.

Identify Final Availability: Weights were multiplied by the component-specific data to produce weighted data for each component. Weighted data for each component was summed. This produced a final availability estimate for each sex and race/ethnic group, as well as for minorities in the aggregate.

See the Availability Analysis for the availability breakdown for each job group.
CHAPTER 5: COMPARING INCUMBENCY TO AVAILABILITY
41 C.F.R. § 60-2.15

Once final availability estimates were made for each job group, California State University, Los Angeles compared the percentage of incumbents in each job group to their corresponding availability. A comparison was made between the percentage employed as of November 1, 2013 and that group's final availability.

See the *Comparison of Incumbency to Availability* for the results per job group.
CHAPTER 6: PLACEMENT GOALS
41 C.F.R. § 60-2.16

California State University, Los Angeles has established a percentage annual placement goal whenever it found that minority or female representation within a job group was less than would reasonably be expected given their availability. In each case, the goal was set at the availability figure derived for women and/or minorities, as appropriate for that job group. These goals take into account the availability of basically qualified persons in the relevant labor area. They also take into account anticipated employment opportunities with the University. California State University, Los Angeles believes these goals are attainable. These goals will be reached primarily through recruiting and advertising to increase the pool of qualified minority and female applicants and through implementation of our action-oriented programs (see Chapter 9). Selections will occur only from among qualified applicants. Goals do not require the hiring of persons when there are no vacancies or the hiring of a person who is less likely to do well on the job ("less qualified") over a person more likely to do well on the job ("better qualified"), under valid selection procedures. Goals do not require that California State University, Los Angeles hire a specified number of minorities or women.

Goals are not rigid and inflexible quotas which must be met, but are instead targets reasonably attainable by means of applying every good faith effort to make all aspects of the entire AAP work. A goal is a guidepost against which California State University, Los Angeles, a community group, or a compliance agency can measure progress in remedying identified deficiencies in California State University, Los Angeles’ workforce. By setting realistic goals, based on expected vacancies and anticipated availability of skills within the relevant labor area, and using a job-related selection system, California State University, Los Angeles should be able to meet the goals, assuming it conducts effective recruitment and advertising efforts to ensure an adequate pool of qualified minority and/or female qualified applicants from which to make selections.

In establishing goals, California State University, Los Angeles considered the results which could reasonably be expected from putting forth every good faith effort to make the overall AAP work. The University involved Human Resources Management staff, department heads, unit managers and supervisors in the goal-setting process. Goals were not established that would exclude any gender or race/ethnic group.

See the Placement Goals report for each job group.
CHAPTER 7: DESIGNATION OF RESPONSIBILITY
41 C.F.R. § 60-2.17(a)

As part of its efforts to ensure equal employment opportunity to all individuals, California State University, Los Angeles has designated specific responsibilities to various staff to ensure the AAP focuses on all components of the employment system. To that end, the University President, the Assistant Vice President, Human Resources Management, the Diversity and Inclusion Director, and those employed as supervisors and managers have undertaken the responsibilities described below:

University President

The primary responsibility and accountability for implementing the AAP rests with the President. This person is responsible, through the Assistant Vice President, HRM and the Diversity and Inclusion Director, for adherence to California State University, Los Angeles’ policy of equal employment opportunity and affirmative action. This role includes, but is not limited to, the following duties:

1. Designate appropriate personnel with the responsibility for overseeing, administering, implementing, and monitoring California State University, Los Angeles’ AAP. Ensure that these personnel are identified in writing by name and job title.

2. Ensure that those designated personnel responsible for all AAP components are given the necessary authority and top management support and staffing to successfully implement their assigned responsibilities.

3. Impart the personal direction that ensures total involvement and commitment to equal employment opportunity programs through California State University, Los Angeles’ AAP.

Assistant Vice President, Human Resources Management

The Assistant Vice President, HRM is responsible for overall supervision of the AAP. The Assistant Vice President, HRM ensures, through the Director, Diversity and Inclusion, and department managers and supervisors, that all relevant policies and procedures are adhered to. Successful implementation of this program is a basis for evaluating the Assistant Vice President’s, HRM effective work performance. The Assistant Vice President’s, HRM responsibilities include, but are not limited to, the following:

1. Ensure that California State University, Los Angeles adheres to the stated policy of equal employment opportunity, and monitor the application of equal employment opportunity policies.

2. Ensure that the AAP is reviewed and updated annually in accordance with California State University, Los Angeles’ stated policy.
3. Participate in periodic discussions with management, supervision, and all other employed personnel to ensure AAP and equal employment opportunity policies are being followed.

4. Review the qualifications of all employees to ensure equitable opportunity, based on job-related employment practices, is given to all for transfers and promotions.

5. Conduct periodic audits of: 1) training programs and hiring and promotion patterns to remove impediments to the attainment of AAP goals and objectives, 2) facilities to ensure they are maintained for the use and benefit of all employees and integrated both in policy and practice, and 3) sponsored educational, training, recreational, and social activities to ensure that all employees are encouraged to participate in accordance with policies of non-discrimination.

6. Ensure that all new employees receive a special orientation to California State University, Los Angeles’ equal employment opportunity policy and are thoroughly informed with regard to the AAP and its objectives.

7. Periodically analyze applicant flow to determine the mix of persons applying for employment by race/ethnic origin and gender.

8. Ensure that recruitment advertising is placed in minority and female-oriented publications, as applicable.

9. Review all position descriptions and specifications to ensure they are free of discriminatory provisions and artificial barriers. Ensure that all requirements are job-related, that they are realistic, and that they reflect the actual work requirements of the essential job duties.

**Diversity and Inclusion Director**

The Diversity and Inclusion Director is responsible for ensuring the directives of the University President and Assistant Vice President, HRM are implemented. The Diversity and Inclusion Director’s duties include, but are not limited to, the following:

1. Provide direction to California State University Los Angeles's employees, as necessary, to carry out all actions required to meet the University’s equal employment opportunity and affirmative action commitments.

2. Review, report on, and update California State University, Los Angeles’ AAP at least on an annual basis in accordance with stated policy.

3. Responsible for the design and effective implementation of the AAP at all establishments.
4. Develop, implement, and maintain audit and reporting systems to measure effectiveness of equal employment opportunity programs, including those that will indicate the need for remedial action and determine the degree to which goals and objectives have been obtained.

5. Advise management in the modification and development of California State University, Los Angeles’ policies to ensure the enhancement of equal employment opportunity for all employees and potential employees within existing equal employment opportunity guidelines.

6. Conduct periodic audits to ensure all required posters and those advertising California State University, Los Angeles’ equal employment opportunity policies and AAP are displayed and that California State University, Los Angeles’ equal employment opportunity and AAP policies are being thoroughly communicated.

7. Assist in review and revision of all policies, procedures, and rules to ensure they are not in violation of federal or state laws and regulations.

Managers and Supervisors

In their direct day-to-day contact with California State University, Los Angeles’ employees, managers and supervisors have assumed certain responsibilities to help the University ensure compliance with equal employment opportunity programs and effective implementation of the AAP. These include, but are not limited to, the following:

1. Aggressively adhere to California State University, Los Angeles’ equal employment opportunity and affirmative action policy.
   
   A. Support and assist the Assistant Vice President, HRM and Diversity and Inclusion Director in developing, maintaining, and successfully implementing the AAP.
   
   B. Complete progress reports regarding the status of goal achievement.
   
   C. Take action to prevent harassment of employees placed through affirmative action efforts.

2. Assign employees to significant jobs that might lead to greater personal growth and value, and counsel them with respect to what is needed for upward mobility within the employment structure.

3. Ensure that all interviews, offers of employment and/or wage commitments are consistent with California State University, Los Angeles’ policy.

4. Implement the internal promotion and transfer of all employees under their supervision consistent with AAP goals and objectives.
5. Assist in identifying problem areas and provide needed information for establishing and meeting department affirmative action goals and objectives.
CHAPTER 8: IDENTIFICATION OF PROBLEM AREAS
41 C.F.R. § 60-2.17(b)

Terminology

The phrases “comparison of incumbency to availability,” and “problem area” appearing in this chapter are terms California State University, Los Angeles is required by government regulations to use. The criteria used in relation to these terms are those specified by the government. These terms have no independent legal or factual significance. Although California State University, Los Angeles will use the terms in good faith in connection with its AAP, such use does not necessarily signify the University agrees that these terms are properly applied to any particular factual situation and is not an admission of non-compliance with EEO laws, regulations, and objectives. Whenever the term “goal” is used, it is expressly intended that it “should not be used to discriminate against any applicant or employee because of race, color, religion, gender, or national origin,” as stated in Title 41 Code of Federal Regulations, Part 60-2.16(e).

In addition to comparing incumbency to availability within job groups, California State University, Los Angeles has conducted analyses to identify problem areas in each of its selection procedures (i.e., hires, promotions, and terminations). California State University, Los Angeles, will continue to monitor and update these analyses during each AAP year. In each case where potential problem areas have been identified, affirmative actions, as appropriate, will be taken consistent with any of the action-oriented programs described in Chapter 9 of this AAP.

Goals are established within each of the job groups at no less than the current availability data for the job group.

41 C.F.R. § 60-2.17(b)(1): Workforce by Organizational Unit and Job Group

An analysis of minority and female distribution within each organizational unit was accomplished by a thorough investigation of the Workforce analysis.

An analysis of minority and female utilization within each job group was accomplished by a thorough investigation of the Comparison of Incumbency to Availability reports.

41 C.F.R. § 60-2.17(b)(2): Personnel Activity

Applicant flow, hires, promotions, and terminations were analyzed by job group. An analysis of selection disparities in personnel activity between men/women and whites/minorities was accomplished by a thorough examination of transaction data. See the Summary of Personnel Transactions Report for each job group.

41 C.F.R. § 60-2.17(b)(3): Compensation Systems

Compensation analyses were conducted by comparing the salaries for men v. women, and whites
v. minorities in each job title.
CHAPTER 9: ACTION-ORIENTED PROGRAMS
41 C.F.R. § 60-2.17(c)

California State University, Los Angeles tailors its action-oriented programs each year to ensure they are specific to the problem identified.

Action-Oriented Program:

The Action-Oriented Programs designed to address the underutilization of women and minorities are listed below. These Action-Oriented Programs will be carried out throughout the AAP year. The Assistant Vice President, HRM, with the help of the managers, will be responsible in ensuring that the following are implemented:

Recruitment:

1. California State University, Los Angeles will continue to place advertisements on job opportunities through local job service offices, including community colleges and non-profit organizations.

2. Due to the extensive technical education and experience required for some positions, California State University, Los Angeles will also continue to place job opportunity announcements in the University website, the CSU website and HigherEd.

3. Advertisements and newsletters will always carry the Equal Employment Opportunity clause.

4. Minority and female applicants will be considered for all positions for which they are qualified.

5. California State University, Los Angeles will participate in job fairs if there is a sufficient number of openings to warrant participation. California State University, Los Angeles will continue to participate in the annual University Career Center Job Fair.

6. The University will continue to employ students who work during the summer and part-time during the school year. Many of these students are referred by the Career Center and campus community.

Job Specifications/Selection Process:

1. Develop position descriptions that accurately reflect position functions, and are consistent for the same position from one location to another.

2. Develop job or worker specifications that contain academic, experience, and skill requirements that do not constitute inadvertent discrimination. Develop specifications
that are free from bias with regard to age, race, color, religion, national origin, disability or veteran status.

3. Approved position specifications and worker specifications will be made available to all members of management involved in the recruiting, screening, selection, and promotion process. Copies may also be made available to recruiting sources.

4. California State University, Los Angeles will continue to use only worker specifications that include job-related criteria.

5. California State University, Los Angeles will continue to carefully select and counsel all personnel involved in the recruiting, screening, selection, promotion, disciplinary, and related processes to eliminate bias in all personnel actions.

**Job Advancement:**

1. Minority and female employees can be made available for participation in Career Days, and related activities in the community, as desired.

2. California State University, Los Angeles will continue to post or announce job opportunities. California State University, Los Angeles’ Job Posting Policy system requires postings of all positions up to the Executive level.

3. Require supervisory personnel to submit justification when apparently qualified minority or female employees are passed over for promotion.

4. Review seniority practices to ensure such practices are non-discriminatory and do not have discriminatory effect.

5. All employees are actively encouraged to participate in facilities and University-sponsored social and recreational activities.

6. California State University, Los Angeles will continue to use its formal employee evaluation program. The performance evaluation is used for annual reviews for all employees.

7. Provide access to job advancement related training courses.

8. Tuition fee waiver for up to two courses per quarter is offered to all permanent full-time and part-time employees who are interested in pursuing an undergraduate degree or an advance degree, with certain limitations.
CHAPTER 10: INTERNAL AUDIT AND REPORTING
41 C.F.R. § 60-2.17(d)

Inherent in the AAP is the need for periodic self-assessment of problems encountered, corrective action taken, and progress made. Self-evaluation requires complex recordkeeping systems on applicants, employees, and components of the AAP itself. Periodic reports from supervisors, department managers, the Assistant Vice President, HRM, and other relevant persons are required.

The objective of all recordkeeping systems to be implemented is to assess the results of past actions, trends, the appropriateness of goals and objectives, the appropriateness and relevancy of identified solutions to problems, and the adequacy of the Plan as a whole. In addition, a further objective is to identify the proper corrective actions to be made to all components.

In order to fully achieve the objectives of such a recordkeeping system, the results of it must lead to follow-up through feedback to managers, supervisors, and staff, through reallocation of resources, through modifications to plans and the recordkeeping system itself, through appropriate recognition of personal achievements as well as punitive actions for discriminatory acts. For any identified deficiencies, appropriate corrective action will be identified and implemented.

The records that are maintained are the basis for updating the AAP, including revising the availability data and establishing annual numerical goals. The internal audit and reporting system is used as the basis for evaluating systemic, results-oriented programs and affirmative action efforts.

The California State University, Los Angeles auditing and reporting system periodically measures the effectiveness of its total affirmative action program. The Assistant Vice President, HRM:

1. Monitors records of all personnel activity, including referrals, placements, transfers, promotions, terminations, and compensation, at all levels to ensure the nondiscriminatory policy is carried out;

2. Requires internal reporting on a scheduled basis as to the degree to which equal employment opportunity and organizational objectives are attained;

3. Reviews report results with all levels of management; and

CALIFORNIA STATE UNIVERSITY, LOS ANGELES

PART II: AFFIRMATIVE ACTION PLAN FOR COVERED VETERANS AND PERSONS WITH DISABILITIES

FOR

January 1, 2014 – December 31, 2014
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It is the policy of California State University, Los Angeles, and my personal commitment that equal employment opportunity be provided in the employment and advancement of covered veterans and persons with disabilities at all levels of employment, including the executive level. California State University, Los Angeles does not and will not discriminate against any applicant or employee because he or she is a covered veteran or because of a physical or mental disability in regard to any position for which the applicant or employee is qualified. In addition, California State University, Los Angeles is committed to a policy of taking affirmative action to employ and advance in employment qualified covered veterans and individuals with disabilities. Such affirmative action shall apply to all employment practices including, but not limited to, hiring, upgrading, demotion or transfer, recruitment, recruitment advertising, layoff or termination, rates of pay or other forms of compensation, and selection for training, including apprenticeship and on-the-job training. Decisions related to personnel policies and practices shall be made on the basis of an individual's capacity to perform a particular job and the feasibility of any necessary job accommodation. California State University, Los Angeles will make every effort to provide reasonable accommodations to any physical and mental limitations of individuals with disabilities and to disabled veterans.

Our obligations in this area stem from not only adherence to various state and federal regulations, but also from our commitment as an employer in this community to provide job opportunities to covered veterans and persons with disabilities.

If you have any questions regarding policies for equal employment opportunity, harassment or the complaint procedure, you may contact Human Resources Management. Parts of the Affirmative Action Plan may be reviewed, as appropriate, by making an appointment with Human Resources Management.

(Signature)

William A. Covino
President

Date: 12/16/13
CHAPTER B: REVIEW OF PERSONNEL PROCESSES
41 C.F.R. §§ 60-250.44(b); 60-300.44(b); 60-741.44(b)

The University periodically reviews its examination and selection methods to identify barriers to employment, training, and promotion and to ensure that all personnel activities are conducted in a job-related manner which provides and promotes equal employment opportunity for all known covered veterans and employees and applicants with disabilities

1) California State University, Los Angeles periodically conducts a review of its employment processes to ensure thorough and systematic consideration of the job qualifications of 1) known covered veteran applicants and employees and 2) applicants and employees with disabilities for job vacancies filled either by external hiring or internal promotions/transfers, as well as for all training opportunities available. In order to determine whether an individual is qualified for a particular job, a close examination of the content of the job is made, as well as a review of the job qualifications of known covered veterans and individuals with disabilities, both applicants and employees. In determining the qualifications of a covered veteran, consideration is given only to that portion of the military record, including discharge papers, relevant to the job qualifications for which the veteran is being considered.

2) The University ensures that its personnel processes do not stereotype disabled persons or veterans in a manner which limits their access to jobs for which they are qualified.
CHAPTER C: PHYSICAL AND MENTAL QUALIFICATIONS
41 C.F.R. §§ 60-250.44(c); 60-300.44(c); 60-741.44(c)

The University periodically reviews the position description's physical and mental qualifications and requirements as they relate to employment, training, and promotion to ensure that all physical and mental qualifications and requirements are job-related and promote equal employment opportunity for all known covered veterans and employees and applicants with qualified disabilities.

The University’s physical and mental job requirements are reviewed to determine whether or not they are job-related and consistent with business necessity and safe performance on the job.

Schedule for Review: Any previously reviewed classification will be reviewed again if there is a change in working conditions which affects the job's physical or mental requirements (e.g., new requirements, new equipment, etc.).
CHAPTER D: REASONABLE ACCOMMODATION TO PHYSICAL AND MENTAL LIMITATIONS
41 C.F.R. §§ 60-250.44(d); 60-300.44(d); 60-741.44(d)

California State University, Los Angeles will make every effort to provide reasonable accommodations to physical and mental limitations of applicants and employees with disabilities or who are disabled veterans unless it can demonstrate that the accommodations would impose an undue hardship on the operation of business. California State University, Los Angeles will confidentially review performance issues of employees with known disabilities to determine whether a reasonable accommodation is needed when: 1) the employee is having significant difficulty with job performance, and 2) it is reasonable to conclude that the problem is related to the known disability.

Employees may also contact the following at any time to formally request an accommodation:

Name: Mariel S. Mulet
Title: Director, Office for Diversity and Inclusion
Phone: (323) 343-3040
Email: Mariel.Mulet@calstatela.edu
California State University, Los Angeles has developed and implemented a set of procedures to ensure that its employees with disabilities and covered veterans are not harassed due to those conditions. A copy of the sexual harassment policy, which includes a section prohibiting harassment of individuals with disabilities or other veterans is available for distribution to new as well as to existing employees.
CHAPTER F: EXTERNAL DISSEMINATION OF POLICY, OUTREACH AND POSITIVE RECRUITMENT

41 C.F.R. §§ 60-250.44(f); 60-300.44(f); 60-741.44(f)

Based upon the University's review of its personnel policies as described in Chapter B, the following activities will be implemented or continued to further enhance the University’s affirmative action efforts. All activities are the responsibility of the Assistant Vice President, Human Resources Management.

1) Initiate and maintain communication with organizations having special interests in the recruitment of and job accommodations for covered veterans and individuals with disabilities.

2) Disseminate information concerning employment opportunities to publications that primarily reach covered veterans and individuals with disabilities.

3) Provide information emphasizing job opportunities for covered veterans and individuals with disabilities to all local educational institutions, public and private.

4) Inform all recruiting sources, in writing and orally, of the University's affirmative action policy for covered veterans and individuals with disabilities.

5) List with the state Employment Development Department all suitable job openings.

The exemptions for posting jobs are when positions are,

(1) executive and top management positions,
(2) positions that will be filled from within the contractor's organization,
(3) and positions lasting three days or less.

This is an ongoing activity. A listing of job opportunities reported to the state Employment Development Department is always kept current.

6) Send written notification of the University's affirmative action policy to all subcontractors, vendors, and suppliers requesting appropriate action on their part. This includes their obligation to annually file their EEO Reporting form and VETS-100 form and, for employers with 50 or more employees and contracts of $50,000 or more, their obligation to develop a written affirmative action plan.

7) Participate and employ veterans under work study programs with Veterans' Administration.
CHAPTER G: INTERNAL DISSEMINATION OF POLICY
41 C.F.R. §§ 60-250.44(g); 60-300.44(g); 60-741.44(g)

In order to gain positive support and understanding for the affirmative action program for covered veterans and individuals with disabilities, California State University, Los Angeles will implement or continue to implement the following internal dissemination procedures, all of which are the responsibility of the Diversity and Inclusion Director. The following policies and procedures are designed to foster support and understanding from California State University, Los Angeles’ executive staff, management, supervisors, and other employees in an effort to encourage all employees to take the necessary actions to aid California State University, Los Angeles in meeting its obligations:

1) Include the policy in the University's policy manual and other in-house publications.

2) Conduct special meetings with executive, management, and supervisory personnel to explain the intent of the policy and individual responsibility for effective implementation, making clear the University’s position regarding affirmative action efforts.

3) Schedule training sessions for all employees involved in recruiting, selection, promotion, and other related employment issues for covered veterans and individuals with disabilities.

4) Discuss the policy thoroughly in both employee orientation and management training programs.

5) Inform union officials of the University's policy, and request their cooperation.

6) Include non-discrimination clauses in all union agreements, and review all contractual provisions to ensure they are non-discriminatory.

7) Include articles on accomplishments of covered veterans and workers with disabilities in University publications.

8) Post the policy on University bulletin boards, along with the University's harassment policy which includes protection from harassment on the basis of disability.

9) Conduct “Vet Net Ally” trainings every semester to assist faculty and staff in understanding the growing veteran population on college campuses.
California State University, Los Angeles, has developed and currently implements an audit and reporting system that addresses the following:

1) Measures the effectiveness of California State University, Los Angeles’ overall Affirmative Action Program and whether the University is in compliance with specific obligations.

2) Indicates the need for remedial action.

3) Measures the degree to which California State University Los Angeles’s objectives are being met.

4) Whether there are any undue hurdles for individuals with disabilities and other veterans regarding University sponsored educational, training, recreational, and social activities.
CHAPTER I: RESPONSIBILITY FOR IMPLEMENTATION
41 C.F.R. §§ 60-250.44(i); 60-300.44(i); 60-741.44(i)

As part of its efforts to ensure equal employment opportunity to covered veterans and individuals with disabilities, California State University, Los Angeles has designated specific responsibilities to various staff to ensure the AAP focuses on all components of the employment system. To that end, the University President, Assistant Vice President, HRM, Diversity and Inclusion Director, and those employed as supervisors and managers have undertaken the responsibilities described below:

University President

The University President is responsible for providing top management support for the University's AAP. This person issues a memo annually to reaffirm the University's Equal Employment Opportunity Policy and to make known to all employees and applicants the commitment of senior management to EEO and affirmative action. Additional responsibilities include, but are not limited to:

1) Designating appropriate personnel with the responsibility for overseeing, administering, implementing, and monitoring the University's AAP. Ensuring that these personnel are identified in writing by name and job title.

2) Ensuring that designated personnel responsible for all AAP components are given the necessary authority and top management support and staffing to successfully implement their assigned responsibilities.

3) Imparting the personal direction that ensures total involvement and commitment to equal employment opportunity programs through California State University, Los Angeles’ AAP.

Assistant Vice President, HRM

The Assistant Vice President, HRM is responsible for overall supervision of the AAP. The Assistant Vice President, HRM ensures, through the Diversity and Inclusion Director and department managers and supervisors, that all relevant policies and procedures are adhered to. Successful implementation of this program is a basis for evaluating the Assistant Vice President, HRM's effective work performance. The Assistant Vice President, HRM's responsibilities include, but are not limited to, the following:

1) Presenting all needed recommendations and procedural changes to senior management concerning EEO and affirmative action and ensuring that senior management is kept informed of the University's compliance status.

2) Maintaining University-wide management support and cooperation for the University's AAP.
3) Collaborating with senior management on EEO and AAP issues.

4) Assisting line management in arriving at solutions to EEO/AA issues.

5) Reviewing results of audit and reporting systems to assess the effectiveness of the University's AA programs and to direct corrective actions where necessary.

6) Ensuring that the AAP is updated annually for all establishments.

7) Providing guidance to managers and supervisors in taking proper action to prevent employees from being harassed in any way, through one-on-one contact, training, and disciplinary action.

8) Providing guidance and direction to the Diversity and Inclusion Director.

9) Ensuring that relevant staff, (i.e., Diversity and Inclusion Director, managers, and supervisors) are aware that their work performance is being evaluated in part on the basis of their equal employment opportunity efforts and results.

10) Reviewing the qualifications of all employees to ensure equitable opportunity, based on job-related employment practices, is given to all for transfers and promotions.

11) Conducting periodic audits of: 1) training programs and hiring and promotion patterns to remove impediments to the attainment of AAP goals and objectives, and 2) the University's sponsored educational, training, recreational, and social activities to ensure that all employees are encouraged to participate in accordance with policies on non-discrimination. Determine whether known covered veterans and employees with disabilities have had the opportunity to participate in all University-sponsored educational, training, recreation and social activities.

12) Reviewing all job descriptions and specifications to ensure they are free of discriminatory provisions and artificial barriers. Ensuring that all requirements are job-related, that they are realistic, and that they reflect the actual work requirements of the essential job duties.

13) Ensuring the University's VETS-100 and or VETS-100A form are filed annually with the Secretary of Labor.

Diversity and Inclusion Director

The Diversity and Inclusion Director is responsible for ensuring that the directives of the University President and Assistant Vice President, HRM are implemented. The Diversity and Inclusion Director’s duties include, but are not limited to, the following:

1) Providing direction to the University's employees, as necessary, to carry out all actions required to meet the University's equal employment opportunity and
affirmative action commitments.

2) Responsible for the design and effective implementation of the AAP at all establishments.

3) Developing, implementing, and maintaining audit and reporting systems to measure effectiveness of equal employment opportunity programs, including those that will
   a) Indicate need for remedial action,
   b) Determine degree to which goals and objectives have been obtained.

4) Advising management in the modification and development of the University's policies to ensure the enhancement of equal employment opportunity for all employees and potential employees within existing equal employment opportunity guidelines.

5) Identifying problem areas and establishing procedures, goals and objectives to solve these problems.

6) Providing guidelines in the development, preparation, and implementation of career counseling programs for known covered veterans and employees with disabilities.

7) Conducting periodic audits to ensure all required posters and those advertising the University's equal employment opportunity policies and AAP, as well as the Invitation to Self-Identify for covered veterans and individuals with disabilities, are displayed and that the University's equal employment opportunity and AAP policies are being thoroughly communicated.

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

9) Assisting line management in arriving at solutions to issues.

10) Serving as the liaison between California State University, Los Angeles and enforcement agencies.

11) Keeping management informed of the latest developments in the equal employment opportunity area.

12) Reviewing, reporting on, and updating the AAP annually in accordance with stated policy. Informing employees and applicants of significant changes.

13) Working closely with the Assistant Vice President, HRM and department managers and supervisors in coordinating the effective implementation of all identified affirmative actions.
14) Assisting in review and revision of all policies, procedures, and rules to ensure they are not in violation of federal or state laws and regulations.

15) Responsible for ensuring overall the University's compliance with the AAP.

**Managers and Supervisors**

In their direct day-to-day contact with the University's employees, managers and supervisors have assumed certain responsibilities to help California State University, Los Angeles ensure compliance with equal employment opportunity programs and effective implementation of the AAP. These include, but are not limited to, the following:

1) Aggressively adhering to the University's equal employment opportunity policy.

2) Supporting and assisting the Assistant Vice President, HRM and Diversity and Inclusion Director in developing, maintaining, and successfully implementing the AAP.

3) Taking action to prevent harassment of employees placed through affirmative action efforts.

4) Assigning employees to significant jobs that might lead to greater personal growth and value, and counsel them with respect to what is needed for upward mobility within the employment structure.

5) Ensuring that all interviews, offers of employment and/or wage commitments are consistent with the University’s policy.

6) Implementing the internal promotion and transfer of all employees under their supervision consistent with AAP goals and objectives.

7) Assisting in identifying problem areas and providing needed information for establishing and meeting department affirmative action goals and objectives.

8) Seeking and sharing information on feasible accommodations which have been or could be made for known disabilities.
CHAPTER J: TRAINING
41 C.F.R. §§ 60-250.44(j); 60-300.44(j); 60-741.44(j)

California State University, Los Angeles trains all employees involved in any way with the recruitment, selection, promotion, disciplinary actions, training, and related processes of individuals with disabilities or other veterans to ensure commitment to the University’s stated Affirmative Action goals.
CHAPTER K: COMPENSATION
41 C.F.R. §§ 60-250.21(i); 60-300.21(i); 60-741.21(i)

It is the policy of California State University, Los Angeles that when offering employment or promotion to covered veterans or individuals with disabilities, the amount of compensation offered will not be reduced because of any disability income, pension, or other benefit the applicant or employee receives from another source.