

EXECUTIVE ORDER 11246 AFFIRMATIVE ACTION PLAN (AAP)

for

**CALIFORNIA STATE UNIVERSITY, CHANNEL ISLANDS
One University Drive
Camarillo, CA 93012
805-437-8400**

November 1, 2021 – October 31, 2022

PART I: AAP FOR MINORITIES AND WOMEN

PART II: AAP FOR PROTECTED VETERANS AND INDIVIDUALS WITH DISABILITIES

AA/EEO Contact: Title IX & Inclusion Officer
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CSU Channel Islands wishes to make it clear that it does not consent to the release of any information whatsoever contained in this AAP under the Freedom of Information Act or otherwise. If the U.S. Government, or any agency or subdivision thereof, is considering breaching the conditions under which this AAP was loaned to such Government, or is considering a request for release of this AAP under the Freedom of Information Act, a request is hereby made that the Government immediately notify the President of CSU Channel Islands of any and all Freedom of Information Act requests received by the Government or any other contemplated release of this AAP by the Government which relates to information obtained by the Government from the University. We further request that everyone who has any contact with this AAP or its supporting data treat such information as totally confidential and that such information not be released to any person whatsoever. Retention or disclosure of information relating to identifiable individuals may also violate the Privacy Act of 1974.

CSU CHANNEL ISLANDS AAP

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INTRODUCTION TO PARTS I AND II

BACKGROUND

California State University, Channel Islands is a four-year university committed to the highest ideals and standards in education subject to the affirmative action requirements of Executive Order 11246, the Rehabilitation Act of 1973 as amended, and the Vietnam Veterans' Readjustment Assistance Act of 1974, Section 4212.

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 Affirmative Action Plan 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 will detail 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 CSU Channel Islands was developed.

At CI, students are placed at the center of the educational experience. We strive to involve, engage, and enrich their lives in a welcoming environment in which they participate in academic and student life programs. Curricular and co-curricular programs such as those sponsored by the Center for Multicultural Engagement and Multicultural Programs seek to involve students in learning that develops their cultural competence and awareness of diversity issues. The purpose of Student Affairs' Multicultural Programs is: to educate students on issues of diversity and equality, to advocate for under-represented groups on campus, to affirm and celebrate the unique heritage of our students, to promote awareness, understanding, and appreciation for all peoples and culture, to be a uniting force on campus, and to foster an environment that is emotionally, mentally, physically, and spiritually safe and beneficial to all areas of student life and development.

CI focuses on its mission pillars of Interdisciplinary, Multicultural and International Perspectives and Civic Engagement to involve students in interdisciplinary course work, service learning, study abroad and programs which infuse these pillars into their educational experience.

CI established the President's Commission on Human Relations, Diversity and Equity, whose mission is to promote and embrace a campus climate and culture that welcomes all forms of multiculturalism and diversity in order to ensure a safe and inclusive environment at CI for working, living and learning. The Commission holds as a value: Diversity at CI is a source of renewal and vitality.

The Academic Senate of CI passed Senate Resolution SR11-03, Resolution to Advance the Ethnic and Racial Diversity of Faculty, Staff, and Administrators, which states: Be resolved that the Academic Senate supports the implementation of innovation and affirmative initiatives and additional processes in order to: assess the recruitment and hiring practices of the university; guide the recruitment, retention, and promotion of faculty, staff and administrators from historically underrepresented groups; and create a leadership program for such faculty and staff to promote their development to become academic administrators.

CI received its designation as a Hispanic-Serving Institution (HSI) from the U.S. Department of Education and is working to develop its identity as an HSI. The campus currently has grant funding from the Department of Education through two Title V grants funded in 2021 and 2022 respectively that involve curricular and outreach components. Each Project involves a partnership between Academic Affairs and Student Affairs. Project ALAS (Aligning Learning and Academic Success) facilitates a partnership between CI, Moorpark, Oxnard and Ventura Colleges to increase student enrollment, transfer and graduation rates in the county – particularly among underserved students, while Project OLAS (Optimizing Learning, Achievement and Success) is an ongoing initiative designed to help students navigate the first two years of college. Nearing its completion, Project ACCESO (Achieving Cooperative College Education through STEM Opportunities, 2011-2022) is a STEM (Science, Technology, Engineering & Mathematics) project which provide curricular opportunities and support for STEM students and outreach to draw prospective under-represented minority students into STEM fields; this project is a cooperative effort with the local community colleges. As ACCESO will soon sunset, efforts to secure a second wave of funding are underway. This project is referred to on campus as STEM 2.0.

The CI difference can be measured by the breadth and scope of these educational programs and experiences guided by a dedicated faculty and staff who are determined to see students succeed. CI's Student Success partnership, a joint venture of Student Affairs and Academic Affairs, a group commissioned by the Office of the President and renewed with a new charge in 2021, addresses areas where there are achievement gaps for under-represented minority students, examines metrics of student outcomes, and addresses how to improve and close those gaps. CI's Senate Resolution 03-03 defines the Characteristics of CI Graduates. CI Graduates are: *Informed* about past, present and future issues affecting human society and the natural world and the interrelatedness of society and the natural world, *Empowered* with the disciplinary and interdisciplinary knowledge necessary to evaluate problems, the ability to translate knowledge into judgment and action, and excellent communication skills for conveying their interpretations and opinions to a diverse audience, *Creative* in developing imaginative self-expression and independent thinking with joy and passion for learning, and *Dedicated* to maintaining the principles of intellectual honesty, democracy, and social justice, and to participating in human society and the natural world as socially responsible individual citizens.

Taken together these entities and statements are evidence of the CI community commitment to the goals of equal opportunity and affirmative action in education and employment. CI aims to provide an academic and work environment for staff and students that fosters fairness, equity, and respect for social and cultural diversity, and that is free from unlawful discrimination, harassment or any conduct that does not embrace the value of our differences.

CSU Channel Islands is a federal government supply and service contractor subject to the affirmative action requirements of Executive Order 11246, the Rehabilitation Act of 1973 as amended, and the Vietnam Veterans' Readjustment Assistance Act of 1974, Section 4212. Because CSU Channel Islands has \$50,000 or more in annual contracts with the federal government and employs 50 or more employees, we are required to prepare annual written Affirmative Action Plans (AAP's) for minorities and women, for protected veterans, and for individuals with disabilities for our organization. Failure to comply with these laws and their implementing regulations, which are enforced by the Office of Federal Contract Compliance Programs (OFCCP), can result in debarment of the University from future contracts and subcontracts.

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 affirmative action plan 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 reveals a numeric disparity between incumbency (and/or hiring rates for veterans) and availability, 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. For protected veterans and individuals with disabilities, such steps will include a thorough review of the University's outreach efforts to determine the effectiveness of such efforts in closing the hiring and/or utilization gaps. It is toward this end that the following AAP of CSU Channel Islands was developed.

APPLICABLE AFFIRMATIVE ACTION LAWS AND REGULATIONS

CSU Channel Islands' 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).

CSU Channel Islands has developed separately an affirmative action plan for protected veterans and individuals with disabilities (Part II) prepared in accordance with the Rehabilitation Act of 1973, Section 503, as amended and Title 41, Code of Federal Regulations, Part 60-741 (Affirmative Action Program for Individuals with Disabilities), the Vietnam Era Veterans' Readjustment Assistance Act of 1974, Section 4212, as amended, and Title 41 Code of Federal Regulations, Part 60-300 (Affirmative Action Program for protected veterans).

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 served on active duty in the U.S. military during a war or campaign or expedition for which a campaign badge is awarded.

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.

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 CSU Channel Islands 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 CSU Channel

Islands 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 CSU Channel Islands' 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 CSU Channel Islands 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 CSU Channel Islands 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 dates:

- Employee (snapshot) data: October 31, 2021
- Transaction period (hires, promotions/transfers, and terminations): July 1, 2020 – October 31, 2021
- AAP implementation period: November 1, 2021 – October 31, 2022

STATEMENT OF PURPOSE FOR PARTS I AND II

This AAP has been designed to bring women and men, members of minority groups, protected veterans, and individuals with disabilities into all levels and segments of CSU Channel Islands' 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, CSU Channel Islands 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 CSU Channel Islands' 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 us to properly identify three key concepts:

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

These three concepts are the Affirmative Action Plan.

CSU CHANNEL ISLANDS

PART I: AFFIRMATIVE ACTION PLAN FOR MINORITIES AND WOMEN

FOR

NOVEMBER 1, 2021 – OCTOBER 31, 2022

PART I

AAP FOR MINORITIES AND WOMEN

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CHAPTER 10:	INTERNAL AUDIT AND REPORTING SYSTEM 41 C.F.R. § 60-2.17(d)

PART I: AAP FOR MINORITIES AND WOMEN

CHAPTER 1: ORGANIZATIONAL PROFILE

41 C.F.R. § 60-2.11

Workforce Analysis/Lines of Progression

CSU Channel Islands conducted a workforce analysis to identify employees by gender and race/ethnicity in each job title. The data was collected from payroll records dated October 31, 2021.

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, CSU Channel Islands 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 CSU Channel Islands' 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 *Workforce Analysis/Lines of Progression* for the results per organizational unit.

CHAPTER 2: JOB GROUP ANALYSIS

41 C.F.R. § 60-2.12

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 a 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/IPEDS categories. While there are usually two or more job groups within each EEO/IPEDS category, for smaller contractors some, or all, of their job groups may correspond to EEO/IPEDS categories.

CSU Channel Islands 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 October 31, 2021.

See ***Job Group Analysis*** for the listing of the job titles and the associated race and gender headcounts per job group.

CHAPTER 4: DETERMINING AVAILABILITY

41 C.F.R. § 60-2.14

"Availability" is an estimate of the proportion of each sex and race/ethnic group available and qualified for employment at CSU Channel Islands 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 CSU Channel Islands' 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 2006-2010 American Community Survey (ACS) Census of Population data.
 - A. Local labor area: An employee Zip Code Analysis was used to identify the most precise local labor area for CSU Channel Islands. See ***Zip Code Analysis***.
 - B. Reasonable labor area: Reasonable labor area is the United States.
2. Internal Factor: The percentage of minorities or women among those promotable, transferable, and trainable within the contractor's organization.

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.¹

See the ***Availability Analysis*** for the availability breakdown for each job group.

¹ In most cases, the final availability report (and most other technical reports in this AAP) only includes data/information for females and minorities in the aggregate.

CHAPTER 5: COMPARING INCUMBENCY TO AVAILABILITY
41 C.F.R. § 60-2.15

Once final availability estimates were made for each job group, CSU Channel Islands compared the percentage of incumbents in each job group to their corresponding availability. A comparison was made between the percentage employed as of October 31, 2021 and that group's final availability.

See *Comparison of Incumbency to Availability* for the results per job group.

CHAPTER 6: PLACEMENT GOALS

41 C.F.R. § 60-2.16

CSU Channel Islands has established an annual percentage 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 our organization. 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. 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 a person 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 CSU Channel Islands hire a specified number of minorities or women.

A goal is a guidepost against which CSU Channel Islands, a community group, or a compliance agency can measure progress in remedying identified deficiencies in CSU Channel Islands' workforce. By setting realistic goals, CSU Channel Islands should be able to meet the goals, assuming we conduct effective recruitment and advertising efforts to ensure an adequate pool of qualified minority and/or female applicants.

See *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, CSU Channel Islands has designated specific responsibilities to various staff to ensure the AAP focuses on all components of the employment system. To that end, the President, the Vice President for Business and Financial Affairs, the Provost and Vice President for Academic Affairs, the Associate Vice President for Human Resources, the Title IX & Inclusion Officer and those employed as supervisors and managers have undertaken the responsibilities described below.

President

The primary responsibility and accountability for implementing the AAP rests with the President. This person is responsible, through the Vice President for Business and Financial Affairs, the Provost and Vice President for Academic Affairs, the Associate Vice President Human Resources, and the Title IX & Inclusion Officer for adherence to CSU Channel Islands' 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 CSU Channel Islands' 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 commitment to equal employment opportunity programs through CSU Channel Islands' AAP.

Vice President for Business and Financial Affairs

Note: The Provost and Vice President for Academic Affairs maintains oversight and responsibility for faculty hiring following the same relevant policies and procedures with the support of the Assistant Provost.

The Vice President for Business and Financial Affairs is responsible for overall supervision of the AAP. The Vice President for Business and Financial Affairs ensures, through the Associate Vice President for Human Resources, the Title IX & Inclusion Officer 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 Vice President for Business and Financial Affairs' effective work performance. The Vice President for Business and Financial Affairs' responsibilities include, but are not limited to, the following:

1. Ensure that CSU Channel Islands 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 CSU Channel Islands' 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. Through Human Resources administration and Equal Opportunity (Title IX & Inclusion) administration, ensure the following:
 - A. Review the qualifications of all employees to ensure equitable opportunity, based on job-related employment practices, is given to all for transfers and promotions.
 - B. 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 on non-discrimination.
 - C. Ensure that all new employees receive a special orientation to CSU Channel Islands' equal employment opportunity policy and are thoroughly informed with regard to the AAP and its objectives.
 - D. Periodically analyze applicant flow to determine the mix of persons applying for employment by race/ethnic origin and gender.
 - E. Ensure that recruitment advertising is placed in minority and female-oriented publications, as applicable.
 - F. Review all job 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.

Associate Vice President Human Resources

The Associate Vice President Human Resources, with the support of the Director of Human Resources and in collaboration with the Title IX & Inclusion Officer, is responsible for ensuring the directives of the President and Vice President for Business and Financial Affairs are implemented. The Associate Vice President Human Resources' duties include, but are not limited to, the following:

1. Provide direction to CSU Channel Islands' 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 CSU Channel Islands' AAP at least on an annual basis in accordance with stated policy.
3. 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.
4. Conduct periodic audits to ensure all required posters and those advertising CSU Channel Islands' equal employment opportunity policies and AAP are displayed and that CSU Channel Islands' equal employment opportunity and AAP policies are being thoroughly communicated.
5. Promote effective design and implementation of the AAP at all establishments.

Title IX & Inclusion Officer

The Title IX & Inclusion Officer, in collaboration with the Director of Human Resources and the Assistant Provost, is responsible for ensuring the directives of the President, the Provost and the Vice President for Business and Financial Affairs are implemented. The Title IX & Inclusion Officer's duties include, but are not limited to, the following:

1. Ensure that CSU Channel Islands adheres to the stated policy of equal employment opportunity, and monitor the application of equal employment opportunity policies.
2. Lead the review and revision of all local campus equal opportunity policies, procedures, and rules to ensure they are not in violation of federal or state laws and regulations.
3. Review, report on, and update CSU Channel Islands' AAP at least on an annual basis in accordance with stated policy.
4. Promote effective design and implementation of the AAP at all establishments.
5. Advise management in the modification and development of CSU Channel Islands' employment practices to ensure the enhancement of equal employment opportunity for all employees and potential employees within existing equal employment opportunity guidelines.

Managers and Supervisors

In their direct day-to-day contact with CSU Channel Islands' 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. Adhere to CSU Channel Islands' equal employment opportunity and affirmative action policy.
 - A. Support and assist the Vice President for Business and Financial Affairs, Associate Vice President Human Resources and Title IX & Inclusion Officer 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 CSU Channel Islands' 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 CSU Channel Islands 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 CSU Channel Islands 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, CSU Channel Islands has conducted studies to identify problem areas in each of its selection procedures (i.e., hires, promotions, and terminations). CSU Channel Islands will continue to monitor and update these studies 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.

Background:

Note 1: California State University Channel Islands is one campus within the California State University system, which includes twenty-three campuses and Office of the Chancellor. Any and all references to affirmative steps, action, or processes within this document are not only subject to applicable state and federal law, but also to the restrictions within the various staff and faculty bargaining agreements and Chancellor’s Office Executive Order or other controlling memorandum.

Note 2: The AAP data mapping system will currently only accept seven distinct “destination codes”. Information contained within the CI employee database that did not fit within these predefined codes were not considered as part of any analysis that included those predefined codes in an attempt to preserve the integrity of the analysis to the greatest extent practical.

Note 3: Zip code analysis reports only apply to job groups where populated census data is available.

Note 4: CI uses the 80% rule with whole person statistical test for the reports attached to the

AAP. The 80% rule with whole person is a standard rule defined in the uniform guidelines. A violation of this rule occurs if a group's incumbency is less than 80% of the group's availability. The additional number is rounded down to the next whole person. A "violation" of the 80% rule with whole person is not, nor does it suggest, a violation of law, policy, mandate, or affirmative action program. Instead, the 80% of the whole person test can be used as an indicator of an area that may require further analysis to determine what the basis for the disparity between incumbency and availability is and whether any action should be taken as part of our overall affirmative action program.

Note 5: The CI employee database does not currently contain or track the number of current employees that are promotable, transferable, and trainable within the organization. Therefore, the internal availability factor cannot currently be considered into the availability analysis.

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 *Workforce Analysis Summary*.

An analysis of minority and female utilization within each job group was accomplished by a thorough investigation of *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 *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)

CSU Channel Islands tailors our 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 Vice President for Business and Financial Affairs, with the help of the managers, will be responsible in ensuring that the following are implemented.

Recruitment:

1. CSU Channel Islands will strive to advertise employment opportunity announcements for key positions in these publications and on websites that will most effectively alert underrepresented groups of campus employment opportunities.
2. Due to the extensive technical education and experience required for some positions, CSU Channel Islands will also continue to place job opportunity announcements in the University website, and in national newspapers when appropriate.
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. CSU Channel Islands will participate in job fairs if there are sufficient numbers of opening to warrant participation.
6. When CSU Channel Islands publishes recruiting brochures, it will ensure minority and female members of the workforce are included, as well as in other University literature.

Job Specifications/Selection Process:

1. Develop position descriptions that accurately reflect position functions.
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. CSU Channel Islands will continue to use only worker specifications that include job-related criteria.
5. CSU Channel Islands will include information to eliminate bias in all personnel actions in its recruiting practices and classification materials for all personnel involved in the recruiting, screening, selection, promotion, disciplinary, and related processes.

Job Advancement:

1. Minority and female employees can be made available for participation in Career Days, Youth Motivation Programs, and related activities in the community, as desired.
2. CSU Channel Islands will continue to post or announce job opportunities. CSU Channel Islands posts job opportunities in accordance with applicable Collective Bargaining Units and strongly encourages the posting of positions not represented by a Collective Bargaining Agreement.
3. Establish, whenever feasible, formal career counseling programs to include attitude Development, education, aid, job rotation, buddy system, and similar program.
4. Encourage the design of child-care, housing, and transportation programs to improve employment opportunities for minorities and females.
5. CSU Channel Islands will continue to use our formal employee evaluation program. The performance appraisal is used for annual reviews for all employees.
6. All employees are actively encouraged to participate in facilities and University-sponsored social and recreational activities.
7. Employees can work with their supervisors to choose suitable training courses and include them in their career development plan.
8. Fee waivers are offered to eligible California State University Channel Islands' employees.

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 record keeping systems on applicants, employees, and components of the AAP itself. Periodic reports from supervisors, department managers, the Vice President for Business and Financial Affairs, the Provost and Vice President for Academic Affairs and other relevant persons are required.

The objective of all record keeping 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 record keeping 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 record keeping 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 affirmative action plan, 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 CSU Channel Islands' auditing and reporting system periodically measures the effectiveness of its total affirmative action program. The Vice President for Business and Financial Affairs and the Provost and Vice President for Academic Affairs:

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
4. Advises top management of program effectiveness and submit recommendations to improve unsatisfactory performance.

CSU CHANNEL ISLANDS

**PART II: AFFIRMATIVE ACTION PLAN FOR PROTECTED VETERANS AND
INDIVIDUALS WITH DISABILITIES**

FOR

NOVEMBER 1, 2021 – OCTOBER 31, 2022

PART II

AAP FOR PROTECTED VETERANS AND INDIVIDUALS WITH DISABILITIES

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CHAPTER A: POLICY STATEMENT
41 C.F.R. §§ 60-300.44(a); 60-741.44(a)

It is the policy of CSU Channel Islands and my personal commitment that equal employment opportunity be provided in the employment and advancement for all persons regardless of race, religion, color, national origin, sex, age, sexual orientation/gender identity/transgender status and status as a protected veteran or individual with a disability at all levels of employment, including the executive level. CSU Channel Islands does not and will not discriminate against any applicant or employee regardless of race, religion, color, national origin, sex, age, sexual orientation/gender identity/transgender status and status as a protected veteran and/or individual with a disability to any position for which the applicant or employee is qualified. In addition, CSU Channel Islands is committed to a policy of taking affirmative action to employ and advance in employment qualified protected veteran employees and qualified employees with disabilities at all levels, including the executive level. 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. CSU Channel Islands will make every effort to provide reasonable accommodations to any physical and mental limitations of individuals with disabilities and to disabled veterans.

Employees and applicants shall not be subjected to harassment, intimidation, threats, coercion or discrimination because they have engaged in or may engage in any activity protected by state, federal or local anti-discrimination laws including the following activities:

- (1) Filing a complaint;
- (2) Assisting or participating in an investigation, compliance evaluation, hearing, or any other activity related to the administration of the affirmative action provisions of the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended (VEVRAA) or any other Federal, state or local law requiring equal opportunity for disabled veterans, recently separated veterans, active wartime or campaign badge veterans, or Armed Forces service medal veterans or Section 503 of the Rehabilitation Act of 1973, as amended (Section 503) or any other federal, state or local law requiring equal opportunity for disabled persons;;
- (3) Opposing any act or practice made unlawful by VEVRAA or its implementing regulations or any other federal, state or local law requiring equal opportunity for disabled veterans, recently separated veterans, active wartime or campaign badge veterans, or Armed Forces service medal veterans or section 503 or its implementing regulations or any other federal, state or local law requiring equal opportunity for disabled persons; or
- (4) Exercising any other right protected by VEVRAA or Section 503 or their implementing regulations.

CSU Channel Islands is also committed to abiding with the Pay Transparency Nondiscrimination Provisions and therefore, will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. CSU Channel Islands' employees who have access to the compensation information of other employees or applicants as part of their essential job functions are informed and trained to not disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) a response to a formal complaint or charge; (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with CSU Channel Islands' legal duty to furnish the information.

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 all persons regardless of race, religion, color, national origin, sex, age, sexual orientation/gender identity/transgender status and status as a protected veteran or an individual with disability. As President, CSU Channel Islands' EEO policy and affirmative action obligations include my full support.

CSU Channel Islands will also continually design and implement audit and reporting systems that will measure the effectiveness and the compliance of the AAP, identify the need for remedial actions, determine if objectives were attained, and determine if opportunities to participate in University-sponsored activities were extended to all employees and applicants.

If you have any questions regarding our equal employment opportunity, harassment policies or the complaint procedure, you may contact the campus Title IX & Inclusion Officer. Parts of the Affirmative Action Plan may be reviewed, as appropriate, by making an appointment with a local Human Resources representative.

(Signature)

Richard Yao, Ph.D.
Interim President, CSU Channel Islands

November 1, 2021

CHAPTER B: REVIEW OF PERSONNEL PROCESSES
41 C.F.R. §§ 60-300.44(b); 60-741.44(b)

To ensure that all personnel activities are conducted in a job-related manner which provides and promotes equal employment opportunity for all known protected veterans and employees and applicants with disabilities, reviews are periodically made of the University's examination and selection methods to identify barriers to employment, training, and promotion.

- 1) CSU Channel Islands periodically conduct a review of its employment processes to ensure thorough and systematic consideration of the job qualifications of 1) known protected 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 protected veterans and individuals with disabilities, both applicants and employees. In determining the qualifications of a protected 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 individuals with disabilities or protected veterans in a manner which limits their access to jobs for which they are qualified.
- 3) The University ensures that applicants and employees with disabilities have equal access to its personnel processes, including those implemented through information and communication technologies.
- 4) The University provides reasonable accommodations, unless such accommodations will cause undue hardship to the University, to applicants and employees with disabilities to ensure that equal employment opportunity are extended in the operation of its personnel processes.
- 5) The University ensures that information and communications systems are accessible to all employees and applicants with disabilities even in the absence of a specific request for accommodation.

CHAPTER C: PHYSICAL AND MENTAL QUALIFICATIONS
41 C.F.R. §§ 60-300.44(c); 60-741.44(c)

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

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 §§ 60-300.44(d); 60-741.44(d)

CSU Channel Islands 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. Such reasonable accommodations are implemented in the University's electronic and/or online application systems. The University ensures that qualified applicants and employees with disabilities, who are unable to fully utilize the system, are provided equal opportunities to apply and be considered for all jobs. CSU Channel Islands 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:

Angela Portillo
HR and Employee Relations Manager
(805) 437-8423
angela.portillo@csuci.edu

CHAPTER E: HARASSMENT
41 C.F.R. §§ 60-300.44(e); 60-741.44(e)

CSU Channel Islands has developed and implemented a set of procedures to ensure that its employees with disabilities and protected 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 protected 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. §§ 60-300.44(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 our affirmative action efforts. All activities are the responsibility of the Vice President Business and Financial Affairs and the Provost and Vice President for Academic Affairs through sound administration in the Human Resources, Faculty Affairs and Title IX & Inclusion Offices.

- 1) Initiate and maintain communication with organizations having special interests in the recruitment of and job accommodations for protected veterans and individuals with disabilities.
- 2) Include workers with disabilities when employees are pictured in consumer, promotional, or help wanted advertising.
- 3) Recommend that recruiting and hiring managers disseminate information concerning employment opportunities to radio and television stations, and to publications that primarily reach protected veterans and individuals with disabilities.
- 4) Encourage recruiting and hiring managers to provide information emphasizing job opportunities for protected veterans and individuals with disabilities to all local educational institutions, public and private.
- 5) Inform all recruiting sources, in writing and orally, of the University's affirmative action policy for protected veterans and individuals with disabilities.
- 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-4212 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) Encourage participation in veterans "job fairs" and work study programs with Veterans' Administration rehabilitation facilities and schools which specialize in training or educating protected veterans.
- 8) CSU Channel Islands will also grant leaves of absence to employees who participate in honor guards for the funeral of veterans.

CHAPTER G: INTERNAL DISSEMINATION OF POLICY
41 C.F.R. §§ 60-300.44(g); 60-741.44(g)

In order to gain positive support and understanding for the affirmative action program for protected veterans and individuals with disabilities CSU Channel Islands will implement or continue to implement the following internal dissemination procedures, all of which are the responsibility of the Associate Vice President Human Resources. The following policies and procedures are designed to foster support and understanding from CSU Channel Islands' executive staff, management, supervisors, and other employees in an effort to encourage all employees to take the necessary actions to aid CSU Channel Islands 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 President's attitude.
- 3) Schedule training sessions for all employees involved in recruiting, selection, promotion, and other related employment issues for protected veterans and individuals with disabilities.
- 4) Discuss the policy thoroughly in both employee orientation and management training programs.
- 5) Inform union officials of the contractor's policy, and request their cooperation.
- 6) Encourage the inclusion of articles on accomplishments of protected veterans and workers with disabilities in University publications.
- 7) Post the policy on University bulletin boards, along with the University's harassment policy which includes protection from harassment on the basis of disability.
- 8) When employees are featured in employee handbooks or similar publications for employees, include employees with disabilities.

CHAPTER H: AUDIT AND REPORTING SYSTEM
41 C.F.R. §§ 60-300.44(h); 60-741.44(h)

CSU Channel Islands has developed and currently implements an audit and reporting system that addresses the following:

- 1) Measures the effectiveness of CSU Channel Islands' overall affirmative action program and whether the University is in compliance with specific obligations.
- 2) Indicates the need for remedial action. Any corrective actions will be the responsibility of the Associate Vice President Human Resources.
- 3) Measures the degree to which CSU Channel Islands objectives are being met.
- 4) Whether there are any undue hurdles for individuals with disabilities and protected veterans regarding University sponsored educational, training, recreational, and social activities. This will also include, but not limited, to the review of the on-line and electronic application system to determine their accessibility and ensuring that procedures to request for accommodations are prominently displayed and that individuals with disabilities can readily obtain the needed accommodation.

CHAPTER I: RESPONSIBILITY FOR IMPLEMENTATION

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

As part of its efforts to ensure equal employment opportunity to protected veterans and individuals with disabilities, CSU Channel Islands has designated specific responsibilities to various staff to ensure the AAP focuses on all components of the employment system. To that end, the President, Vice President for Business and Financial Affairs, the Provost and Vice President for Academic Affairs, Associate Vice President Human Resources, Title IX & Inclusion Officer and those employed as supervisors and managers have undertaken the responsibilities described below.

President

The 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 commitment to equal employment opportunity programs through CSU Channel Islands' AAP.

Vice President for Business and Financial Affairs

Note: The Provost and Vice President of Academic Affairs maintains oversight and responsibility for faculty and Librarian hiring following the same relevant policies and procedures with the support of the Faculty Affairs office.

The Vice President for Business & Academic Affairs is responsible for overall administration of the AAP. The Vice President for Business & Academic Affairs ensures, through sound administration by the Human Resources and Title IX & Inclusion offices, 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 Vice President for Business and Financial Affairs' effective work performance. The Vice President for Business and Financial Affairs' responsibilities include, but are not limited to, the following:

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

- 2) Reviewing results of audit and reporting systems to assess the effectiveness of the University's AA programs and to direct corrective actions where necessary.
- 3) Collaborating with Senior Management on EEO and AAP issues.
- 4) Ensuring that the AAP is updated annually for all establishments.
- 5) Providing guidance and direction to the Associate Vice President Human Resources.
- 6) Ensuring that relevant staff, (i.e., Associate Vice President Human Resources, the Title IX & Inclusion Officer, 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.
- 7) Working with Human Resources and the Title IX & Inclusion Officer to ensure equitable opportunity, based on job-related employment practices, is given to all for transfers and promotions.
- 8) Working with Human Resources and the Title IX & Inclusion Officer to conduct 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 protected veterans and employees with disabilities have had the opportunity to participate in all University-sponsored educational, training, recreation and social activities.
- 9) Through Human Resources, review 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.
- 10) Ensuring the University's VETS-4212 form is filed annually with the Veterans' Employment and Training Service (VETS).

Associate Vice President Human Resources

The Associate Vice President Human Resources with support of the Director of Human Resources is responsible for ensuring that the directives of the President and Vice President for Business and Financial Affairs are implemented. The Associate Vice President Human Resources' 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 protected veterans and employees with disabilities.
- 7) CSU Channel Islands conducts periodic audits to ensure that all required posters and the equal employment opportunity policies and AAP are displayed properly. CSU Channel Islands also conducts audits to ensure that the Invitation to Self-Identify (pre and post offer) for protected veterans and individuals with disabilities, the University's equal employment opportunity, and AAP policies are being utilized appropriately and thoroughly communicated.
- 8) Ensure that employees are re-surveyed regarding their disability status every five (5) years and send out reminders to employees, at least once during the five (5) year intervals, that they may voluntarily update their disability status at any time.
- 9) Assisting line management in arriving at solutions to problems.

Title IX & Inclusion Officer

The Title IX & Inclusion Officer is responsible for ensuring that the directives of the President and Vice President for Business and Financial Affairs and Provost and Vice President for Academic Affairs are implemented. The Title IX & Inclusion Officer's duties 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) Assisting line management in arriving at solutions to EEO/AA problems.
- 4) Serving as the liaison between CSU Channel Islands and enforcement agencies.
- 5) Serving as the liaison between CSU Channel Islands and organizations and community action groups for protected veterans and individuals with disabilities, in addition to ensuring that representatives are involved in community service programs of local organizations for protected veterans and individuals with disabilities.
- 6) Keeping management informed of the latest developments in the equal employment opportunity area.
- 7) Reviewing, reporting on, and updating the AAP annually in accordance with stated policy. Informing employees and applicants of significant changes.
- 8) Working closely with the Vice President for Business and Financial Affairs, Vice President for Academic Affairs, and Associate Vice President for Human Resources and department managers and supervisors in coordinating the effective implementation of all identified affirmative actions.
- 9) 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.
- 10) Developing policy statements, affirmative action programs, internal and external communication techniques.

Managers and Supervisors

In their direct day-to-day contact with the University's employees, managers and supervisors have assumed certain responsibilities to help CSU Channel Islands 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 Vice President for Business and Financial Affairs and Associate Vice President Human Resources 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. §§ 60-300.44(j); 60-741.44(j)

CSU Channel Islands trains all employees involved in any way with the recruitment, selection, promotion, disciplinary actions, training, and related processes of individuals with disabilities or protected veterans to ensure commitment to the University's stated affirmative action goals.

CHAPTER K: DATA COLLECTION ANALYSIS

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

CSU Channel Islands has adopted the current national percentage of veterans in the civilian labor force of 5.6% as its hiring benchmark for protected veterans. CSU Channel Islands will update its hiring benchmark as new data is published and updated via the OFCCP's website. The 5.6% hiring benchmark is applied to each job group within CSU Channel Islands.

CSU Channel Islands also adopted the current national utilization goal of 7.0% for qualified individuals with disabilities. CSU Channel Islands will update its utilization goal as new data becomes available, updated and published. The 7.0% utilization goal is applied to each job group within CSU Channel Islands.

Goals and/or benchmarks do not require that CSU Channel Islands hire, promote, train, and/or retain a specified number of individuals with disabilities and/or protected veterans. These goals/benchmarks are not rigid and inflexible quotas which must be met, but are instead targets reasonably by means of applying every good faith effort to make all aspects of the entire AAP work. A goal is a guidepost against which CSU Channel Islands, a community group, or a compliance agency can measure progress in remedying identified deficiencies in CSU Channel Islands' workforce.

CSU Channel Islands has collected the required data and conducted studies to identify areas of opportunities in the employment of protected veterans and individuals with disabilities. CSU Channel Islands will continue to monitor and update these studies periodically during each AAP year. In each case where the hiring benchmark for protected veterans and/or the utilization goal for individuals with disabilities are not met, affirmative actions, as appropriate, will be taken consistent with the activities mentioned in Chapter F (External Dissemination of Policy and Outreach and Positive Recruitment) and measures described in Chapter H (Internal Audit and Reporting) of this AAP.

See *Hiring Benchmark and Utilization Goals Analyses*.

CHAPTER L: COMPENSATION
41 C.F.R. §§ 60-300.21(i); 60-741.21(i)

It is the policy of CSU Channel Islands that when offering employment or promotion to protected 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.

CSU Channel Islands is also committed to abiding with the Pay Transparency Nondiscrimination Provisions. Employees or applicants who have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant will not be discharged or in any other manner be discriminated. Employees who have access to the compensation information of other employees or applicants as part of their essential job functions are informed and trained to not disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) a response to a formal complaint or charge; (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with the CSU Channel Islands' legal duty to furnish the information.