



THE UNIVERSITY OF NORTH CAROLINA SYSTEM

REPORT: AFFIRMATIVE ACTION PLAN

January 1, 2019 – December 31, 2019

The University of North Carolina System
Chapel Hill, North Carolina

**UNC SYSTEM OFFICE
AFFIRMATIVE ACTION PLAN**

January 1, 2019 to December 31, 2019

**PART 1
WOMEN AND MINORITIES**

**PART 2
QUALIFIED PROTECTED VETERANS AND QUALIFIED INDIVIDUALS WITH DISABILITIES**

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WOMEN AND MINORITIES

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PART I

**UNC SYSTEM OFFICE
AFFIRMATIVE ACTION PLAN
For
WOMEN AND MINORITIES**

SECTION I

EQUAL EMPLOYMENT OPPORTUNITY POLICY STATEMENT

It is the policy of the University of North Carolina System Office (UNC System Office) to provide equal opportunity in employment for all qualified persons and to prohibit discrimination in employment because of race, color, religion, sex, sexual orientation, gender identity, national origin, age, disability, genetic information, or protected veteran status. It is also the policy of the UNC System Office to take affirmative action to employ and to advance in employment all persons regardless of their status as individuals with disabilities or protected veterans.

This affirmative action plan is published in accordance with *41 CFR Part 60-2.10(a)(3)*, *41 CFR §60-741.44(a)* and *41 CFR §60-300.44(a)* and is implemented in accordance with the following laws and their amendments: Title VII and Title IX of the Civil Rights Act of 1964; The Equal Pay Act of 1963; Executive Order 11246; the Age Discrimination in Employment Act of 1967; the Rehabilitation Act of 1973, as amended (Section 503); the Americans with Disabilities Act of 1990; the Vietnam Era Veterans' Readjustment Assistance Act of 1974 (VEVRAA); the Civil Rights Restoration Act of 1988; NC General Statutes Chapters 116 and 126 and Title II of the Genetic Information Nondiscrimination Act of 2008.

The UNC System Office has been and will continue to be an equal opportunity employer. *The Code* of the Board of Governors for the University of North Carolina Statement on Equality of Opportunity in the University and the Equal Employment Opportunity Policy are referenced in Exhibit 1.

In keeping with The Code and Equal Employment Opportunity Policy, the UNC System Office will continue to recruit, hire, train, and promote the most qualified persons without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, age, disability, genetic information, or veteran status. Similarly, all other personnel matters such as compensation, benefits, transfers, layoffs, training, education, tuition assistance, and related programs will continue to be administered in accordance with University policy. All employment decisions are based on job related standards and must comply with the principles of equal employment opportunity.

Employees and applicants shall not be subjected to harassment, intimidation, threats, coercion, or discrimination because they have engaged in or may engage in any of 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 Section 503, VEVRAA, or any other Federal, State, or local law requiring equal opportunity for disabled persons or protected veterans; (3) Opposing any act or practice made unlawful by Section 503, VEVRAA, or implementing regulations in this part or any other Federal, State, or local law requiring equal opportunity for disabled persons or protected veterans; or (4) Exercising any other right protected by Section 503, VEVRAA, or implementing regulations in this part.

The President's Statement of Commitment to Affirmative Action and Equal Employment Opportunity is included as Exhibit 2.

SECTION II

DISSEMINATION OF POLICY

Internal Dissemination

The UNC System Office will continue to make its EEO policy known internally by:

1. Posting the Policy Statement on the UNC System Office Human Resources' website.
2. Ensuring the presence of required EEO posters on its website and throughout UNC System Office facilities where employees and applicants for employment can see them.
3. Including the Equality of Opportunity in the University, the Equal Employment Opportunity policy, and the Prohibited Discrimination, Harassment, and Retaliation Policy in its listing of [UNC System Office Human Resources policies](#).
4. Explaining the Policy Statement, the Equality of Opportunity in the University, the Equal Employment Opportunity policy, and the Prohibited Discrimination, Harassment, and Retaliation Policy in new employee orientation and including these in supervisor and manager training programs.
5. Meeting with non-supervisory employees to discuss the Policy Statement, the Equality of Opportunity in the University, the Equal Employment Opportunity policy, and/or Prohibited Discrimination, Harassment, and Retaliation Policy, as requested or by identified need.
6. Making current employees aware of the existence of the Affirmative Action Plan.
7. Including representation of women and minorities in UNC System Office print and web publications.

External Dissemination

The UNC System Office will continue to make its EEO policy known externally by:

1. Ensuring the terms and conditions of all purchase orders and contracts with subcontractors contain or reference the required EEO clause and other language required by regulations. An example of a professional services contract is included as Exhibit 7.
2. Ensuring the presence of required EEO law posters on its website.
3. Incorporating the Equal Employment Opportunity clause in all recruitment advertising and job postings.

SECTION III

DESIGNATION OF RESPONSIBILITY

41 CFR §60-2.17(a)

The University Equal Opportunity Officer is the official who has been assigned the responsibility for the implementation of the Affirmative Action Plan for all employees of the UNC System Office. This official has the authority and the resources to ensure effective implementation and reports to the Senior Vice President for Human Resources, having access to and support of executive management at UNC System Office in the discharge of EEO/AA responsibilities. The University EO Officer is accountable for compliance with all equal employment opportunity laws and policies, and all UNC System Office policies and practices with respect to affirmative recruitment, non-discriminatory selection, recordkeeping, and reporting on compliance activities to the President.

The University Equal Opportunity Officer is responsible for ensuring:

1. The Affirmative Action Plan is updated annually.
2. The EEO clause and other language required by regulations is incorporated into the State of North Carolina General Contract Terms and Conditions for purchase orders, leases, and contracts.
3. Employment opportunities are posted in accordance with UNC System Office policy.
4. Recruitment, including affirmative outreach as appropriate, of potential applicants is without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, age, disability, genetic information, or veteran status.
5. Managers and supervisors at the UNC System Office understand they are responsible for and will be held accountable for making all employment decisions in accordance with UNC System Office policy and without regard to unlawful factors.
6. The UNC System Office uses only job related criteria for selection for hire, promotion, transfer, training, compensation and all other employment opportunities.
7. The identification of problem areas or investigation and response to problem areas identified by UNC System Office employees.
8. The establishment and/or review of organizational EEO goals and objectives.
9. Technical compliance, such as the proper display of EEO/AA posters and EEO/AA policy statements.
10. That UNC System Office facilities maintained for the use and benefit of its employees are, in fact, desegregated, both in policy and in use, and that facilities are comparable for both sexes.
11. All employees, including minority and female employees, are encouraged to participate in all University-sponsored educational, training, recreational, and social activities.
12. The UNC System Office prohibits and prevents harassment and discrimination of employees on account of race, color, religion, sex, national origin, age, disabling condition, sexual orientation, gender identity, genetic information, or veteran status.

13. The reporting of any breaches of policy or obstacles to the fulfillment of the above to the appropriate supervisor, up to and including the President, so that appropriate action to resolve such problems can be managed in accordance with UNC System Office policy and practice.
14. Offering confidential counseling to both employees and supervisors upon request.
15. Working with hiring managers in outreach and recruiting efforts to develop diverse pools in accordance with affirmative action goals at UNC System Office.

Managers and supervisors are responsible for ensuring the effective implementation of the UNC System Office's Affirmative Action Plan within their units by:

1. Assisting in the identification of problem areas, in formulating solutions, and in reviewing processes to ensure barriers to equal employment opportunity do not exist.
2. Reviewing the qualifications of all applicants and employees to ensure qualified individuals are treated in a nondiscriminatory manner when hiring, promotion, transfer, and termination actions occur.
3. Having the responsibility defined within annual performance plans to comply with EEO laws and policies and to assist in achieving EEO goals established by the university.
4. Reviewing the job performance of each employee to assess whether personnel actions are justified based on employee performance of their duties and responsibilities.

The UNC System Office's Affirmative Action Plan is reviewed by multiple individuals who strive to ensure that information is properly presented and that action-oriented goals are realistic, measurable, and adhere to federal regulations. The following employees meet during the year, as necessary, to work towards achieving action-oriented equal opportunity and affirmative action goals.

SHRA employees:

- Classification and Compensation Analyst
- Senior HR Business Analyst
- Employee Relations and Equal Opportunity Consultant
- Talent Acquisition Consultant

EHRA employees:

- UNC-TV Human Resources Manager and Assistant University EO Officer
- Associate Vice President for Employee Relations and University Equal Opportunity Officer
- Associate Vice President for Classification and Compensation
- Senior Associate Vice President for Leadership Development and Talent Acquisition
- Associate General Counsel
- Senior Vice President for Human Resources

Additional collaboration among these group throughout the year include:

1. EEO and Employee Relations professionals work together when conducting and evaluating feedback from surveys of the UNC System Office's organizational climate.
2. EEO, Employee Relations, and General Counsel professionals review any recommended changes or additions to UNC System Office policies, including the EEO policy.
3. EEO, Employee Relations, and Classification and Compensation professionals work together to review organizational changes that may impact the affirmative action plan.
4. EEO and Talent Acquisition personnel work collaboratively to identify recruitment resources and activities to strengthen the affirmative action program.
5. EEO and Talent Acquisition personnel work collaboratively to create new outreach partnerships as one effort to ensure UNC System Office takes good-faith steps to attract, recruit, and employ staff; specifically, underrepresented groups who identify as veterans, individuals with disabilities, minorities, and females.
6. EEO, Talent Acquisition, and HR Business Analyst personnel work collaboratively to ensure the UNC System Office's Applicant Tracking System's (ATS) capabilities enhance our ability to strategically capture demographic data and measure the effectiveness of UNC System Office's outreach, recruitment marketing, and recruitment and retention-focused initiatives.

SECTION IV
IDENTIFICATION OF PROBLEM AREAS
BY JOB GROUP AND ORGANIZATIONAL UNIT

41 CFR §60-2.17(b) (1)

The UNC System Office has conducted an analysis of its total employment process to determine whether and where any impediments to equal employment opportunity exist by organizational unit or Job Group. Included in this analysis are those employment processes that impact both employees subject to the State Human Resources Act (SHRA) and those exempt from the State Human Resources Act (EHRA).

The UNC System Office applied 2010 census data to conduct the analysis of its employment data and used a variety of other data sources in the analysis for this plan.

Problems of minority or female utilization by Organizational Unit

In reviewing the organizational profile, all UNC System Office organizational units currently have female and minority representation. Although there is no requirement that the UNC System Office perform an availability analysis equivalent to that done under *41 CFR §60-2.14* nor make an incumbency to availability comparison by organizational unit equivalent to that done under *41 CFR §60-2.15*, we understand OFCCP to be concerned when there are impediments to the utilization/employment of minorities and/or women in any organizational unit. Action-oriented programs to address this utilization issue are discussed in Section VIII.

Problems of minority or female distribution/placement by Organizational Unit

We have identified no impediments to equal employment opportunity in the placement of women or minorities in the different jobs in our organizational units.

Problems of minority or female utilization by Job Category

In prior years, the UNC System Office has compared the incumbency of minorities and women in each job group pursuant to *41 CFR §60-2.15* to determine if the availability for a Job Group is greater than incumbency. For the 2018 and 2019 plans, the UNC System Office has compared the incumbency of minorities and women by job category to determine if there were any Job Categories in which the percentage of minorities or women employed in the Job Category was less than would reasonably be expected given the availability percentage for that particular Job Category. The statistical method used to determine underutilization by comparing employment with availability was two standard deviations supplemented by binomial probability for groups with fewer than thirty members.

In 2018, the UNC System Office identified four Job Categories where minorities or women were underutilized:

Job Category	Gender	Minority/Race
1E: Senior Institutional & Chief Functional Officer	Female	
4E: External Affairs & Communication		Hispanic
6B: Technology Tech/Paraprofessional		Black/African-American
8B: Service/Maintenance Staff		Hispanic

For 2019, the UNC System Office identified only one Job Category where minorities or women were underutilized:

Job Category	Gender	Minority/Race
6B: Technology Tech/Paraprofessional		Black/African-American

The UNC System Office has established placement goals in accordance with *41 CFR §60-2.16* that will be shared with hiring managers when filling such vacancies. Expanded efforts to recruit for minorities or females in the underutilized areas will be undertaken in the Job Categories in which those individuals are underrepresented. The methodology employed in this analysis is discussed in detail in Section X of this Affirmative Action Plan.

Problems of minority or female distribution/placement by Job Category:

To the extent a goal has been established for minorities or females in a Job Category, any problem areas will be addressed by our good faith efforts to meet such goal. See also the discussion of action-oriented programs in Section VIII of the Affirmative Action Plan and internal monitoring in Section IX of the Affirmative Action Plan.

SECTION V

IDENTIFICATION OF PROBLEM AREAS PERSONNEL ACTIVITY

41 CFR §60-2.17(b) (2)

The UNC System Office has conducted an analysis of its total employment process to determine whether and where any impediments to equal employment opportunity exist based on its evaluation of HR process. Included in this analysis are those HR processes that impact both employees who are *Subject* to the State Human Resources Act (SHRA employees) and employees who are *Exempt* from the State Human Resources Act (EHRA employees).

Applicant Flow

The UNC System Office does not accept unsolicited applications or resumes. Such job seekers are not applicants. We maintain data on all applicants. Applicants of identifiable race, ethnicity, and sex are those who voluntarily complete a self-identification form. As a part of the application process, applicants are offered the opportunity to complete the Voluntary Self-Identification of Demographic Information in accordance with the Vietnam Era Veterans' Readjustment Assistance Act (VEVRAA) as well as the Voluntary Self-Identification of Disability. Records are kept for each selection decision, if any, for which the applicant was considered. This allows us to complete required analyses, by job title, of the selection rates of persons of identifiable race, sex, and ethnic group. These data and analyses are not a part of the written Affirmative Action Plan, but they are collected and will be submitted to OFCCP in response to a request for same during the course of a compliance review.

We compare the percentage of minorities and females who apply by Job Category with our estimate of availability for each Job Category in the identified labor market to assist in monitoring good faith efforts to invite minorities and women to apply for equal opportunities at the UNC System Office.

Hires, Promotions and Other Personnel Actions

In order to be considered for any opportunity, a job seeker (whether internal or external) must make a timely submission expressing interest in the stated opportunity through the online application form required by the UNC System Office as part of our applicant tracking system or through a designated search firm, if applicable. This may be an online application and/or an online resume, depending on the position. In the event an online application is required, it must be electronically signed and completely filled out or it will not be evaluated, and no employment decision will be made about that job seeker.

The UNC System Office advertises employment opportunities as required by *41 CFR §60-300.5(a)(2)*. Positions for which both internal and external applicants may apply are advertised in appropriate media and posted on the UNC System Office website. Positions that are available only to internal applicants are posted on the UNC System Office website with an indication that recruitment is limited to current employees of UNC System Office.

In addition, the UNC System Office records other job changes, including "in line" or "career ladder" promotions, such as movement from Assistant to Associate Vice President. These job changes sometimes constitute advancement (with or without change in pay) to an incumbent. There is no fixed "head count" of Assistant Vice Presidents, for example. Advancement in career progression for one employee does not constitute a "denial" of any opportunity for any other employee.

Similarly, the UNC System Office records, but does not include in an analysis of selections, HR processes, such as reinstatement to the prior job upon return from medical leave (long-term or short-term), reinstatement or placement as a result of settlement of a grievance, or those transactions that do not involve the selection of one job seeker and the rejection of another or others. Such personnel activities are not “opportunities.”

Based on the business need, the UNC System Office reclassifies employees whose jobs have changed as a result of reorganization, assumption of additional responsibilities, and redistribution of work or learned new competencies (knowledge, skills, and abilities). These reclassifications/career progression adjustments are not from “among” any pool of persons from which we make a selection, and they may not be commingled with competitive selections for analytical purposes. Nevertheless, the UNC System Office records and reviews them to ensure that such reclassifications/career progression adjustments are not unlawfully based on race, color, religion, sex, sexual orientation, gender identity, national origin, age, disability, genetic information, or veteran status.

Terminations

Voluntary Terminations:

There is no “pool” of persons who might choose to terminate employment voluntarily. By definition, such terminations do not involve an employer decision or “selection.” These are, therefore, not susceptible to any statistical analysis of “selection disparities.”

Involuntary Terminations:

There are a variety of reasons for which a person might leave the employment of UNC System Office other than by choice.

Terminations for cause involve an employer decision. However, there is no “pool” of persons who are considered for termination for poor attendance, for poor performance, or for any of the other reasons a person might be discharged. For example, the only persons who are “considered” for termination for poor attendance are those who do not come to work when scheduled; the only persons who are considered for termination for poor performance are those who perform poorly. A disparate treatment analysis or “selection rate” cannot be computed except with similarly situated people. However, the UNC System Office does record these events separately by type, and reports them to OFCCP upon request.

There is only one kind of involuntary termination for which the UNC System Office can do an analysis of “selection disparities” as required by this section of the regulations: a reduction in force. Where the UNC System Office abolishes jobs and must make selection decisions about which incumbents will be retained in the remaining jobs, we make such selection decisions without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, age, disability, genetic information, or veteran status. The Reduction in Force Policy for SHRA employees at the UNC System Office is provided as Exhibit 6. If a reduction in force occurs, we can measure any differences in selection rates to determine if there are statistical indicators of disparate treatment and/or measure the impact of any neutral selection criteria to determine if there is any adverse impact of those criteria. In accordance with the Reduction in Force Guidelines, the UNC System Office completes and submits an SHRA Adverse Impact Analysis to the Office of State Human Resources whenever we have a reduction in force.

Although reduction in force and discharges involve employer choice, other terminations do not. For example, some employees die or do not return, as hoped or expected, from approved leave, such as sick leave, FMLA, or short-term or long-term disability leave. Such terminations may not be “voluntary,” to the employee, but they do not involve a decision by this employer. Some terminations are planned for, such as the completion of a temporary assignment or expiration of an employment contract. There is no “selection decision” involved in such circumstances. It would be erroneous to include such terminations in any statistical computation of “selection disparities.” However, UNC System Office does record these terminations and report them to OFCCP upon request.

Exit interviews with separating employees are conducted by the Employee Relations and Equal Opportunity Consultant through either an in-person interview or through an on-line survey to gather information about their reasons for leaving and share their opinions about working at UNC System Office. Results are compiled into an annual report for HR review and/or troublesome issues are identified and discussed with the appropriate supervisor for immediate attention.

Analyses of HR processes are required to be accomplished as a part of the contractor’s equal employment opportunity and affirmative action program obligations. However, the regulations do not require that the contractor incorporate such analyses into its written Affirmative Action Plan, and we do not. These analyses, however, would be submitted to OFCCP in response to a compliance evaluation or complaint investigation as an attachment to any such transmittal letter.

SECTION VI
IDENTIFICATION OF PROBLEM AREAS
COMPENSATION SYSTEMS

41 CFR §60-2.17(b) (3)

The UNC System Office has performed an analysis of its total employment process to determine whether impediments to equal employment opportunity exist. Specifically, to determine if there are gender, race, or ethnicity-based disparities, we have reviewed our compensation systems for both SHRA and EHRA employees.

The following is a summary analysis of the compensation portion of the total employment process:

For all eligible employees, benefits are offered without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, age, disability, genetic information, or veteran status.

For SHRA employees, the State of North Carolina has written pay policies and a comprehensive compensation system. These policies and procedures are outlined in policy statements, which are made available to all employees via the UNC System Office website.

Each SHRA position is assigned to a banded class job family with an associated salary pay band that provides contributing, journey, and advanced reference rates within each classification title. The salary ranges within these pay bands are subject to review and approval by the Office of State Human Resources and are intended to provide competitive rates with the external labor market, consistent with the State's ability to pay and internal pay alignment within the institution. For jobs within each pay structure, there are no race-, gender- or ethnicity-based disparities. The current State of North Carolina Career Banding Salary Ranges are available on the UNC System Office and the Office of State Human Resources websites.

The establishment of pay bands and salary ranges of varied breadths provide tools for the State to manage compensation in such a way as to attract and retain qualified employees. Although it is typically more expensive for UNC System Office to attract a new hire than to retain a current employee, these ranges provide sufficient flexibility to meet both the essential needs of the organization and requisite skillsets of the candidates based on industry compensation standards. These standards are followed consistently based on policy-defined pay factors with no decisions based on unlawful considerations. These pay factors are financial resources, appropriate market rate, internal pay alignment, and required competencies.

All SHRA positions are in the career banding compensation system. The UNC System Office strives to compensate its career-banded employees at a level that promotes successful work behavior, emphasizes demonstrated competencies that are linked to organizational goals, reinforces high standards of performance, and maintains the labor market competitiveness necessary to recruit, retain, and develop a competent and diverse work force.

Decisions affecting compensation are made consistently based on state policy without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, age, disability, genetic information, or veteran status.

For EHRA employees, salary ranges are established in accordance with the UNC Policy Manual. College and University Professional Association for Human Resources (CUPA-HR) data is used for those positions for which sufficient data is available. Positions not identified with CUPA-HR data are slotted based on equity comparison analysis and review. Salaries for other EHRA employees are established based on market and equity factors. These ranges are reviewed biennially and may be adjusted on the basis of peer institution comparison.

Starting Pay

The following variables affect the setting of starting salary for any position:

1. *Financial Resources* – UNC System Office business need (budget)
2. *Appropriate Market Rate* – Guidelines for market rates, market reference rates, and related market information and dynamics
3. *Internal Pay Alignment* – Internal pay alignment (equity) and total compensation
4. *Required Competencies* – minimum qualifications for class; knowledge, skills, and competencies; related education and experience; duties and responsibilities; and training, certifications, and licenses

This list includes variables that, acting collectively and simultaneously, typically determine pay. This does not mean that there is any “formula” with, for example, relevant education accounting for x% of current compensation or prior experience accounting for 2x% of current compensation. These variables do not operate independently, nor do they operate in the same fashion for each and every job. However, each variable typically plays a role in determining initial pay for most, if not all, jobs. In addition, there may be other job-related variables affecting compensation (either starting pay or post-employment) depending on the specific position. Most of our positions are State-funded; thus, restrictions imposed by the legislature, the Office of State Budget and Management, and/or the Office of State Human Resources may impact our ability to set salaries (either starting pay or post-employment) of both SHRA and EHRA employees.

At Promotion

There are two types of promotion for both SHRA and EHRA employees. The first involves “reclassification/career progression adjustment” for SHRA employees (or job change for EHRA employees) as the employee assumes greater responsibilities as a result of demonstrating superior abilities/competencies. All such promotions are recommended by the employee’s supervisor, who also makes recommendations for promotional increases.

The second type of promotion is “competitive,” where an employee moves into a vacant SHRA or EHRA job or a newly-created position. In that case, the new salary of the individual is determined by the same variables as those described above in the case of a new hire. In addition, there are certain limitations imposed by State policy on the size of promotional increases for SHRA employees. These competitive events are consistently reviewed by the UNC System Human Resources to ensure internal equity.

Vacant jobs are posted in accordance with our posting policy, and incumbent employees may apply to be considered for any vacancy.

Reorganizations may occur within the organizational structure, and staffing changes pursuant to such reorganization may be either competitive or non-competitive.

Legislative increases

Legislative increases for EHRA and SHRA employees are provided by the North Carolina General Assembly as part of its biennial state budget appropriation. The Assembly may determine whether the increase, if any, is awarded across the board or based on performance.

The UNC System Office has carefully reviewed all elements of its compensation system. None produce disparities among similarly-situated employees on account of race, color, religion, sex, sexual orientation, gender identity, national origin, age, disability, genetic information, or veteran status.

The UNC System Office similarly has reviewed promotional increases, both competitive and non-competitive, and found no selection disparities based on unlawful factors.

SECTION VII
IDENTIFICATION OF PROBLEM AREAS
PERSONNEL PROCEDURES

41 CFR §60-2.17(b)(4)

As part of the UNC System Office's ongoing self-audit to identify problems or potential problems, we have conducted an in-depth analysis of the HR procedures component of the total employment process. Included in this analysis are those employment processes that affect both SHRA and EHRA employees.

Requests to Hire, Position Descriptions, and Job Specifications

For SHRA positions, our recruitment processes are governed by the SHRA Recruitment and Selection policy, which is included as Exhibit 4.

The recruitment and selection process for both SHRA and EHRA employees is managed in an online PeopleAdmin system. Guidelines are available to supervisors via the website. Approvals are obtained through the online system before posting any new or vacant position. The Talent Acquisition Consultant is responsible for working with the hiring supervisor to review the job specifications before posting and to ensure that posted job specifications are congruent with State specifications, are consistent with the written position description on file, and are otherwise job-related.

Position descriptions establish job-related and non-discriminatory requirements and are maintained in the PeopleAdmin system. All EHRA and SHRA position descriptions are reviewed as positions become vacant and/or when changes in job duties necessitate revisions.

There are no job titles that could be perceived as evidencing a preference for one gender or another.

Selection Procedures

Applicants for posted opportunities may be either internal employees or jobseekers not currently employed by the UNC System Office. The selection of employees for SHRA positions is governed by the Merit-Based SHRA Recruitment and Selection Plan. Applicants for SHRA positions must submit an online application form. Applicants for EHRA positions complete an online EHRA Applicant Data Form and are required to submit an online letter of interest and a resume.

Applications for SHRA and EHRA positions are submitted electronically into the online PeopleAdmin system. Applications are forwarded to the hiring official for consideration after the posted deadline and after HR review. The hiring official does not have access to information on the race, sex, or ethnicity, nor age of the applicants. The hiring official, with or without the search/screening/selection committee, reviews the online applications and selects the best qualified applicants to interview.

Internal Applicant Procedures

Internal applicants may apply for a lateral transfer, promotion, or even demotion if this is the desire of the internal applicant.

1. Employees may be transferred involuntarily in the case of a departmental reorganization or as management deems best to meet the needs of the UNC System Office.
2. Employees who are interested in a lateral move to a same-level position in their existing or another division, or any other sort of change in their job, must apply for and be selected for a posted position in competition with all other applicants for the opportunity.
3. All employees, including women and minorities, are encouraged to take advantage of the opportunity to apply.
4. Hiring supervisors are encouraged, but not required, to interview any internal applicants who meet the minimum qualifications for a position.
5. Selections are made on the basis of competencies (knowledge, skills, and abilities) without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, age, disability, genetic information, or veteran status.

We have determined that there are no impediments to equal opportunity in these practices.

Employees also may be promoted non-competitively. For SHRA employees, this typically comes about as a result of reclassifying the position that the employee holds. This reclassification/career progression adjustment may occur as a result of the employee learning new competencies of the job, taking on more responsibility, and/or performing better over time. It may also come about as the result of the employee assuming some or all of another employee's duties as a result of a reduction in force, hiring freeze, or reorganization. It would be inappropriate to competitively recruit in these situations, as there is no real "vacancy" or opportunity for anyone but the incumbent.

However, we recognize that such *ad hoc* transitions might operate, intentionally or unintentionally, to the advantage of one group over another. Consequently, we are especially careful to monitor these transactions to ensure there are no disparities based on basis of race, color, religion, sex, sexual orientation, gender identity, national origin, age, disability, genetic information, or veteran status.

EHRA employees may also be promoted when assuming higher-level duties. These transactions do not involve a selection of one employee over another. The UNC System Office has evaluated its promotion procedures to determine whether they operate as impediments to equal employment opportunity. Our promotion procedures do not discriminate on the basis of race, color, religion, sex, sexual orientation, gender identity, national origin, age, disability, genetic information, or veteran status.

See also a summary of internal auditing and reporting in Section IX of this Affirmative Action Plan.

SECTION VIII

ACTION-ORIENTED PROGRAMS

41 CFR §60-2.17(c)

Job Group Programs

The UNC System Office has seven job groups: Executive/Senior Administrators; Managers; Professionals; Office/Clerical Staff; Technical/Paraprofessional; Skilled Craft; and Service/Maintenance, and each group has several job categories. This year, we assessed job categories within these Job Groups to better improve our ability to target efforts for recruitment and to identify categories having fewer minorities or females than would reasonably be expected based on their apparent availabilities.

	UNDERUTILIZED
6B: Technology Tech/Paraprofessional	Minority, Black

Current utilization in the Technology Tech / Paraprofessional area is 9.3%, compared with the weighted comparison benchmark of 27.61% for our expected minority availability. In 2018, two out of eleven hires in this job category (18.2% of hires) were minority candidates. Responsive goals, equal to availability, have been set for this Job Category. The methodology for this computation and the identification of goals is set out in Section X of Part 1 of this Affirmative Action Plan.

We will continue to encourage that all job openings be widely posted and that recruitment efforts include appropriate sources that are likely to enhance the number of women and minorities who apply. We will make arrangements with each source to receive notices of our openings as they occur along with information on our application process and deadline requirements.

Because we have identified some differences in the participation of minorities in the technical/paraprofessional job group for a third year, in addition to carefully monitoring openings, recruitments and selections for this job group in this EEO year, we will continue to seek opportunities to reach a greater number of qualified candidates through targeted job fairs and intern opportunities, particularly in partnership with the University's minority-serving institutions (MSIs). In 2018, the UNC System Office participated in job fairs sponsored by Eastern North Carolina Career Alliance and by DAV/Recruit Military, job fairs at Elon University and Campbell University, and job fairs within the UNC System at UNC Greensboro and Fayetteville State University.

Many of our technical/paraprofessionals are found at UNC-TV, so much of our focus on recruitment and pipeline efforts were directed toward classifications at UNC-TV where minority representation was low.

Organizational Unit Programs

The UNC System Office has female and minority representation in all organizational units at the time the data for this plan were generated. The UNC System Office will continue to encourage that all job openings be widely posted and that recruitment efforts include appropriate sources that are likely to enhance the number of women and minorities who apply. We will make arrangements with each such source to receive notices of our openings as they occur, along with information on our application process and deadline requirements.

Compensation Systems

We will continue to use the Career Banding Compensation System for our SHRA positions as designated by the NC Office of State Human Resources (OSHR) in the Affirmative Action Plan year.

Human Resources Procedures

To assist managers in screening applications and selecting the most qualified applicants for interviews, HR has resources that are available to hiring supervisors via the UNC System Office website and/or by contacting Human Resources. These resources cover such topics as application review, preparing for the interview, conducting the interview, checking references, and EEO overview. The manager also has an opportunity when creating a job posting to include questions related to required education, knowledge, skills and abilities for the applicants to answer. These questions/answers can be used as a screening tool to determine most qualified candidates. Personnel actions follow University and OSHR Grievance and Disciplinary policies.

The UNC System Office also implemented a required online EEO in hiring training module for all participants on hiring committees and implemented an additional training module specifically for hiring supervisors to promote EEO compliance and best practices in hiring.

SECTION IX

AUDIT AND REPORTING SYSTEMS

41 CFR §60-2.17(d)

The EEO Officer or Delegate is responsible for the design and implementation of the auditing and reporting system. The EEO Officer or Delegate audits HR processes on an annual basis in order to measure the effectiveness of the Affirmative Action Plan. The following actions are keys to the auditing and reporting system:

1. Monitoring of all HR processes, including referrals, placements, transfers, promotions, terminations, and compensation, at all levels to ensure the nondiscrimination policy is carried out;
2. Sharing/reviewing report results with all levels of management;
3. Advising top management of program effectiveness and submitting recommendations to improve unsatisfactory performance.

SECTION X

METHODOLOGY FOR EEO NUMERICAL ANALYSES AND ESTABLISHMENT OF GOALS

41 CFR. §§60-2.11 through 2.16

The UNC System Office herein describes the methodology employed with respect to all analyses and actions required by *41 CFR §§60-2.11, -2.12, -2.13, -2.14, -2.15 and -2.16*. In addition, we have annotated the EEO herein as required by *41 CFR §60-2.1(d)*.

Organizational Profile

The UNC System Office has elected to prepare an organizational profile (Exhibit 8: Work Force Analysis) in accordance with *41 CFR §60-2.11(b)*. Specifically, the organizational display identifies the name of each organizational unit; the job title, gender, and race of the unit supervisor; the total number of male and female incumbents; and the total number of male and female incumbents in each of the following groups: American Indian or Alaska Native, Asian, Black or African American, Hispanic or Latino, Native Hawaiian/Other Pacific Islander, White or 2 or More.

This organizational display includes 451 employees as of December 31, 2018.

“Lines of Progression”

Although the regulations call for identification of “Lines of Progression,” such an approach typically occurs in unionized settings or in other very structured operations; there are no formal “Lines of Progression” for positions in this Plan. To the extent that there is a usual “promotional sequence,” it is taken into account in establishing feeder Job Categories in the Availability Analysis. These “career ladders” can be easily identified in the EEO numerical analyses by designations such as “Administrative Support Associate to Administrative Support Specialist.” Within Career Banding, as employees progress and learn new competencies, they can progress within the pay band from contributing to journey to advanced pay levels.

Job Group Analysis

In accordance with *41 CFR §60-2.12(b)*, the UNC System Office has combined all job titles into Job Groups (and Job Categories), grouping them by similarity of wages, content, and opportunity. There are 451 employees in this analysis and there are 20 Job Categories within seven Job Groups (listed below).

As required, the Job Group Summary displays the number of total, female, and minority employees in each job title in the Job Category within each Job Group (Exhibit 8).

The following is a list of the Job Groups for this Affirmative Action Plan:

Executive, Senior Administrators

This job group includes the highest level positions in our organization. These positions have responsibility for setting broad UNC System Office-wide policies and directing divisions within our organization. Most positions in this group require an advanced degree and significant experience. This group includes titles such as President, Senior Vice President, Vice President, Associate Vice President, Secretary of the University, and Executive Director.

Managers

This job group includes a variety of titles and classifications requiring management expertise as evidenced by highly significant experience in the respective field and preferably an advanced degree and several years of applicable experience. These positions have significant decision-making responsibilities and typically report to one of the highest level positions within the Division. This group includes titles such as Director of Education, Training & Outreach, Director of Production, Director of Development, and Director of GEAR UP NC.

Professionals

This job group includes a variety of titles and classifications requiring professional expertise as evidenced by significant experience in the respective field and a minimum of a bachelor's degree. These positions have considerable decision-making responsibilities and function with a high level of autonomy. This group includes titles such as Accountant, Broadcast & Emerging Media Engineering Manager, HR Consultant, Networking Analyst, Staff Attorney, and Senior Research Analyst.

Administrative Office/Clerical Staff

This job group includes all clerical/secretarial related positions whose work is primarily governed by prescribed guidelines and procedures. These positions typically require a high school diploma and minimum of one, two or three years of related experience. This group includes titles such as Administrative Support Associate, Administrative Support Supervisor and Administrative Support Specialist.

Technical/Paraprofessional

This job group includes a variety of titles and classifications typically requiring a two-year degree and/or several years of related experience. These positions typically have an area of expertise/specialty and may or may not have guidelines and reference manuals readily available with which to consult. This group includes titles such as Broadcast & Emerging Media Technician, Purchasing Specialist, Production Assistant, University Program Associate, Paralegal, and Studio & Field Engineering Technician.

Skilled Craft

This job group includes a variety of titles and classifications including, but not limited to, electrical, HVAC, plumbing, welding, cabinetmaking, carpentry, locksmith, masonry, painting, plastering and roofing that perform a variety tasks ranging from routine and unskilled to highly skilled. These positions typically require a minimum of graduation from high school or equivalent. Experience in the trade(s) areas related to the position's role usually may be substituted on a year for year basis. These positions include Facilities Maintenance Technician – Building, Facilities Maintenance Technician – Mechanical and Facilities Maintenance Supervisor.

Service/Maintenance

This job group includes a variety of titles and classifications whose work may have a service/administrative/ facilities role and/or a specialized maintenance role. These positions may require graduation from high school or equivalent and related experience. This group includes such titles as Building Environmental Services Technician and Support Services Associate.

Availability Analysis

Consistent with regulatory requirements, the UNC System Office has separately determined the availability of minorities and women for each Job Category within the above Job Groups. *41 CFR §60-2.14(b)*

The UNC System Office has considered two factors for minorities and two factors for women: the percentage of minorities or women with requisite skills in the reasonable recruitment area; and the percentage of minorities or women among those promotable, transferable and trainable in the current workforce. *41 CFR §60-2.14(c)* These data are presented in Exhibits 9 and 10.

The UNC System Office has used the most current and discrete statistical information available to derive external availability data. In an effort to estimate availability as accurately as possible, the UNC System Office uses the 2010 census data (the most current available at this time) for occupational classifications for its reasonable recruiting areas. In determining “requisite skills,” the UNC System Office has identified those Standard Occupational Classifications (SOCs) reported in the Census that were most representative of the skills required for the positions being analyzed in alignment with our designated Job Groups. The reasonable recruiting area for each Job Group *41 CFR §60-2.14(e)* are below. *41 CFR §60-2.14(d)*

The United States for Job Group:

- Executive, Senior Administrators

North Carolina for Job Groups:

- Managers
- Professionals

The Triangle Metro Area for Job Groups:

- Technical/Paraprofessional
- Office/Clerical Staff
- Service/Maintenance
- Skilled Crafts

These reasonable recruitment areas have not been drawn in such a way to effectively exclude minorities or women. In each case, the reasonable recruiting area was drawn based on the actual experience of the UNC System Office in attracting applicants. Higher-level jobs demand wider searches and a willingness to pay relocation costs. Lower-level jobs, or jobs for which there is ample local availability, are not appropriate for state-wide recruitment efforts since the UNC System Office does not pay relocation costs and job seekers outside the Triangle Metro area (Raleigh-Durham-Chapel Hill) are typically not willing to relocate at their own expense for jobs in these pay ranges. *41 CFR §60-2.14(e)*

The UNC System Office is committed to a policy of upward mobility for all employees in accordance with university need and employee interest. Internal availability is a significant source of workers for many Job Categories. Promotions can and do occur within any Job Category and the estimated frequency of movement into the Job Category determined the value weight for Internal Availability in our computations. At any given time the population of a “feeder” Job Category might include those individuals newly hired/promoted or on probation or with less seniority or otherwise not necessarily “promotable” for every vacancy. However, for purposes of EEO availability estimates only, all individuals in the feeder jobs were counted as “promotable, transferable, and trainable” as discussed above. *41 CFR §60-2.14(f)*

For each Job Category within a Job Group we considered which factor or factors represented a genuine source of available workers for the Job Group during the Affirmative Action Plan Year, and with what frequency the factor(s) could be expected to represent availability, that is, how often we expect to fill vacancies externally (whether locally, from a state-wide, or national recruitment) or from within. The feeder Job Categories that were used are identified in Reasonable Recruitment Area Availabilities (Exhibit 10). We then weighted each factor in accordance with these judgments and computed our final estimate of availability using any factor(s) having a weight greater than “zero.” These data are provided in Incumbency v. Estimated Availability analysis (Exhibit 11). Census data, which serve as a proxy for “requisite skills,” were “weighted” in accordance with the significance of each to the Job Categories within a Job Group based on the number of positions in the Job Categories requiring such skills. *41 CFR §60-2.14(g)*

Comparing Incumbency to Availability

Comparing incumbency to availability, pursuant to *41 CFR §60-2.15(b)*, the UNC System Office is required to establish a goal in any Job Category within a Job Group having fewer women or minorities than might reasonably be expected given their availability. An appropriate measure of “reasonably expected” is statistical probability: that is, if the difference between availability and actual participation is statistically significant, the current incumbency is not “reasonably expected.” We have used an appropriate test of statistical significance, relying on the standard for measuring “reasonably expected” approved by the court in Firestone Tire & Rubber Co., Inc. v. Marshall, 507 F. Supp. 1330, 24 FEP 1699 (Eastern District of Texas, 1981, upholding the decision of the Administrative Law Judge) as well as many other federal courts.

The circumstances under which a placement goal must be established are: when the difference between incumbency and estimated availability is so large as not to be “reasonably expected.” OFCCP makes clear its expectation that contractors may use a number of ways to measure “reasonably expected,” including statistical significance. Because statistical significance is the interpretation of “reasonably expected” made by the court in Firestone Tire & Rubber Co., Inc. v. Marshall, we have adopted such a standard in the comparison of incumbency to availability in our EEO. The measure of statistical significance approved by the Firestone court, as well as many other federal courts, is standard deviation analysis. We have determined statistical probability using standard deviation analysis and have set a goal wherever the difference between availability and incumbency was 2.0 standard deviations or more, see Incumbency v. Estimated Availability (Exhibit 11).

Placement Goals by Job Group

In 2018, although the placement rate of minorities within the Technology Tech / Paraprofessionals job category was 18.2%, the incumbency rate for minorities in this group was 9.3% for the year. The 2019 Affirmative Action Plan for the UNC System Office has a 27.61% placement goal for minorities within this job category (Exhibit 12). Placement goals are established, and good faith efforts will be made to accomplish these goals, in accordance with *41 CFR §60-2.16*.

We will also increase our efforts to attract and hire qualified females in the Senior Institutional and Chief Functional Officers Job Category and to attract and hire qualified Hispanics in the External Affairs and Communications Professionals Job Category. Whether there is a placement goal or not, our objective for every organizational unit, is to continue to take action to ensure that our employment practices are non-discriminatory.

PART II

**UNC SYSTEM OFFICE
AFFIRMATIVE ACTION PLAN
for
QUALIFIED INDIVIDUALS WITH DISABILITIES AND
QUALIFIED PROTECTED VETERANS**

SECTION I

INSPECTION OF THIS AFFIRMATIVE ACTION PLAN

41 §CFR 60-741.41

41 §CFR 60-300.41

The full Affirmative Action Plan for qualified individuals with disabilities and qualified protected veterans shall be available for inspection by any applicant or employee on the UNC System Office website. The plan is also available for inspection at the UNC System Office's Office of Human Resources (Exhibit 16).

SECTION II

PERSONS COVERED BY THIS AFFIRMATIVE ACTION PLAN

41 CFR §60-741.2

41 CFR §60-300.2

Some Important Definitions

The UNC System Office is a government contractor subject to the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended by the Jobs for Veterans Act of 2002, 38 U.S.C. 4212 (VEVRAA) and Section 503 of the Rehabilitation Act (Section 503). As such, the UNC System Office is required to take affirmative action to employ and advance in employment: (1) disabled veterans; (2) recently separated veterans; (3) active duty wartime or campaign badge veterans; and (4) armed forces service medal veterans. These classifications are defined as follows:

- **Active duty wartime or campaign badge veteran** means a veteran who served on active duty in the U.S. military, ground, naval or air service during a war, or in a campaign or expedition for which a campaign badge has been authorized under the laws administered by the Department of Defense.
- **Armed Forces service medal veteran** means a veteran who, while serving on active duty in the U.S. military, ground, naval or air service, participated in a United States military operation for which an Armed Forces service medal was awarded pursuant to Executive Order 12985.
- **Disability** with respect to an individual means (1) A physical or mental impairment that substantially limits one or more major life activities for such individual; (2) A record of such an impairment; or (3) Being regarded as having such an impairment.
- **Disabled veteran** is one of the following: (1) A veteran of the U.S. military, ground, naval or air service who is entitled to compensation (or who, but for the receipt of military retired pay, would be entitled to compensation) under laws administered by the Secretary of Veterans Affairs; or (2) A person who was discharged or released from active duty because of a service-connected disability.
- **Qualified Individual** means a person who satisfied the requisite skill, experience, education, and other job-related requirements of the employment position such individual holds or desires and who, with or without reasonable accommodation(s), can perform the essential functions of such position.
- **Reasonable Accommodation** means modifications or adjustments to a job application process to enable a qualified applicant with a disability to be considered for the position such applicant desires, or to the work environment, or to the manner or circumstances under which the position held or desired is customarily performed, that enable a qualified individual with a disability to perform the essential functions of that position; or that enable the employee with a disability to enjoy equal benefits and privileges of employment as are enjoyed by the contractor's other similarly situated employees without disabilities.
- **Recently separated veteran** means any veteran during the three-year period beginning on the date of such veteran's discharge or release from active duty in the U.S. military, ground, naval, or air service.

SECTION III

INVITATION TO SELF-IDENTIFY

41 CFR §60-741.42

41 CFR §60-300.42

Through the application for employment process, all applicants are invited to identify whether they may be covered by the Rehabilitation Act or Vietnam Era Veterans Readjustment Assistance Act. The form of the invitation to self-identify is as prescribed by the regulations. The invitation states that the information is voluntary, will be kept confidential, and will be used in a manner consistent with law.

UNC System Office will maintain a separate file on persons who have self-identified and will provide that file to the OFCCP upon request.

As a Government contractor, the UNC System Office must reach out to, hire, and provide equal opportunity to qualified people with disabilities in accordance with Section 503 of the Rehabilitation Act of 1973, as amended. As such, applicants and new employees are invited to tell us if they have a disability or if they ever had a disability. Completion is voluntary, and any answers given will be kept confidential as required by law and will not be used against the applicant or employee in any way. Employees who become disabled at any time are offered the opportunity to self-identify as having a disability without fear of any punishment because they did not identify as having a disability earlier.

Applicants/employees are considered to have a disability if they have a physical or mental impairment or medical condition that substantially limits a major life activity, or if they have a history or record of such an impairment or medical condition.

At time of hire, new employees are invited to self-identify during orientation. All UNC System Office employees are provided an opportunity at least annually to self-identify as being covered by the Rehabilitation Act or Vietnam Era Veterans Readjustment Assistance Act or as having a disability.

SECTION IV

EQUAL EMPLOYMENT OPPORTUNITY POLICY STATEMENT

41 CFR §60-741.44(a)

41 CFR §60-300.44(a)

It is the policy of the University of North Carolina System Office (UNC System Office) to provide equal opportunity in employment for all qualified persons and to prohibit discrimination in employment because of race, color, religion, sex, sexual orientation, gender identity, national origin, age, disability, genetic information, or protected veteran status. It is also the policy of the UNC System Office to take affirmative action to employ and to advance in employment all persons regardless of their status as individuals with disabilities or protected veterans.

This affirmative action plan is published in accordance with *41 CFR Part 60-2.10(a)(3)*, *41 CFR §60-741.44(a)* and *41 CFR §60-300.44(a)* and is implemented in accordance with the following laws and their amendments: Title VII and Title IX of the Civil Rights Act of 1964; The Equal Pay Act of 1963; Executive Order 11246; the Age Discrimination in Employment Act of 1967; the Rehabilitation Act of 1973, as amended (Section 503); the Americans with Disabilities Act of 1990; the Vietnam Era Veterans' Readjustment Assistance Act of 1974 (VEVRAA); the Civil Rights Restoration Act of 1988; NC General Statutes Chapters 116 and 126 and Title II of the Genetic Information Nondiscrimination Act of 2008.

The UNC System Office has been and will continue to be an equal opportunity employer. *The Code* of the Board of Governors for the University of North Carolina Statement on Equality of Opportunity in the University and the Equal Employment Opportunity Policy are referenced in Exhibit 1.

In keeping with The Code and Equal Employment Opportunity Policy, the UNC System Office will continue to recruit, hire, train, and promote the most qualified persons without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, age, disability, genetic information, or veteran status. Similarly, all other personnel matters such as compensation, benefits, transfers, layoffs, training, education, tuition assistance, and related programs will continue to be administered in accordance with University policy. All employment decisions are based on job related standards and must comply with the principles of equal employment opportunity.

Employees and applicants shall not be subjected to harassment, intimidation, threats, coercion, or discrimination because they have engaged in or may engage in any of 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 Section 503, VEVRAA, or any other Federal, State, or local law requiring equal opportunity for disabled persons or protected veterans; (3) Opposing any act or practice made unlawful by Section 503, VEVRAA, or implementing regulations in this part or any other Federal, State, or local law requiring equal opportunity for disabled persons or protected veterans; or (4) Exercising any other right protected by Section 503, VEVRAA, or implementing regulations in this part.

The President's Statement of Commitment to Affirmative Action and Equal Employment Opportunity is included as Exhibit 2.

SECTION V

DISSEMINATION OF POLICY

41 CFR §60-741.44(g)

41 CFR §60-300.44(g)

Internal Dissemination

The UNC System Office will disseminate this EEO/AA Policy internally in the following ways:

1. The UNC System Office's Affirmative Action Plan is posted on the website.
2. The UNC System Office periodically informs all employees of its commitment to engage in action to increase employment opportunities for qualified individuals with disabilities and qualified protected veterans through its recruitment and training modules. This may include individual instruction to hiring managers when filling vacant positions.
3. The UNC System Office's Affirmative Action Policy is reviewed in new employee orientation and in management training programs.
4. The Affirmative Action Plan for employees with disabilities and protected veterans is available on the UNC System Office website. The plan is also available for inspection at the Office of Human Resources.

External Dissemination

1. The UNC System Office enlists the assistance and support of recruiting resources that may refer qualified individuals with disabilities and qualified protected veterans for employment opportunities with UNC System Office, such as the Division of Employment Security and/or NC Vocational Rehabilitation Services.
2. The UNC System Office has its plan on the website which is available to all constituencies. The plan is also available for inspection at the UNC System Human Resources Office.
3. The UNC System Office posts all open jobs on its website.
4. Media advertisements and other recruiting communications carry the label line: *The University of North Carolina System Office is an equal opportunity/affirmative action employer that welcomes all to apply, including protected veterans and individuals with disabilities.*

SECTION VI

RESPONSIBILITY FOR IMPLEMENTATION

41 CFR §60-741.44 (i)

41 CFR §60-300.44(i)

The President of the University of North Carolina has overall responsibility for the Affirmative Action Plan for the UNC System Office. The University Equal Opportunity Officer is designated as the EEO/AA Director and is responsible for implementing, monitoring, and administering the Affirmative Action Plan for all Divisions as follows:

1. Develop policy statements, Affirmative Action Plans, and internal and external communication techniques, including discussions with managers, supervisors, and employees to ensure that the UNC System Office policy is being followed.
2. Identify problem areas in the implementation of the Affirmative Action Plan in conjunction with management, and develop solutions.
3. Design and implement audit and reporting systems.
4. Serve as liaison between the UNC System Office and enforcement agencies.
5. Serve as liaison between the UNC System Office and organizations by and for disabled workers, and all veterans covered by this Affirmative Action Plan.
6. Keep management informed of the latest developments in the affirmative action area.
7. Arrange for career counseling as requested by known disabled workers and all veterans covered by this Affirmative Action Plan.
8. Ensure that supervisors and employees are made aware of the UNC System Office's Prohibited Discrimination, Harassment, and Retaliation Policy.

SECTION VII

TRAINING OF PERSONNEL INVOLVED IN SELECTION

41 CFR §60-741.44(j)

41 CFR §60-300.44(j)

The UNC System Office is committed to providing training to all personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes to ensure that the commitments in UNC System Office Affirmative Action Plan are carried out.

UNC System Office Human Resources is also committed to providing training and development tools, resources, online tutorials, and workshops to support employees with their learning needs and promote professional growth and career development. These continuous learning opportunities can be found on the engagement section of the Human Resources website and within the employee self-service section of the UNC System Office's enterprise resource planning platform. This commitment includes targeted mandatory training for hiring supervisors and hiring committee members.

The UNC System Office works with Office of State Human Resources to include all SHRA supervisors in the Equal Employment Opportunity and Diversity Fundamentals training or other OSHR-approved diversity program training within the first year of employment as a supervisor.

SECTION VIII

REVIEW OF PERSONNEL PROCESSES PROPER CONSIDERATION OF QUALIFICATIONS

41 CFR §60-741.44 (b)

41 CFR §60-300.44 (b)

The UNC System Office reviews its employment procedures at least annually to ensure careful, thorough, and systematic consideration of the job qualifications of applicants and employees for job vacancies filled either by hiring or promotion. This review includes those qualified individuals with a disability and qualified protected veterans.

In order to ensure that there has been proper consideration of the qualifications of applicants and employees, the UNC System Office annotates the application of each known covered applicant or employee with each vacancy or promotion for which he or she was considered. The recruitment folder containing this information would be made available to the Department of Labor in carrying out its review of compliance activities.

In addition, the UNC System Office will, in each case where a protected veteran or disabled person is rejected for employment, promotion, or training, make and retain a record sufficient to describe the reasons for the non-selection and the name of the person who was selected. If an accommodation was considered, the record also will reflect this information.

The UNC System Office will make and retain a record of all accommodations undertaken that make it possible to place a protected veteran or disabled person in a job. Records will be retained in accordance with the University Records Retention Schedule.

SECTION IX

REVIEW OF PHYSICAL AND MENTAL QUALIFICATIONS

41 CFR §60-741.44(c)

41 CFR §60- 300.44(c)

To ensure that none of the positions at the UNC System Office has requirements that tend to screen out qualified disabled persons or qualified protected veterans, unless these requirements are job related and consistent with business necessity, the physical and mental qualifications for each open position are reviewed before it is advertised.

In the same way, the UNC System Office will review physical and mental qualifications of any job whenever the position description for that job is revised.

The UNC System Office does not administer pre-placement physical examinations.

Information obtained about any applicant or employee medical condition or history shall be collected and maintained on separate forms and in separate medical files.

These files will be treated as confidential except:

1. Supervisors and managers may be informed regarding necessary restrictions on the work or duties of the applicant or employee and necessary accommodations;
2. First aid and safety personnel may be informed, when appropriate, if the disability might require emergency treatment; and
3. Government officials engaged in enforcing the laws administered by OFCCP or enforcing the Americans with Disabilities Act shall be provided relevant information on request.
4. As required to be disclosed by law.

Information obtained regarding the medical history or condition of any applicant or employee shall not be used for any purpose inconsistent with the law.

SECTION X

REASONABLE ACCOMMODATIONS FOR PHYSICAL AND MENTAL LIMITATIONS

41 CFR §60-741.44(d)

41 CFR §60-300.44(d)

The UNC System Office will make reasonable accommodations for the known physical and mental limitations of an otherwise qualified individual unless it can demonstrate that the accommodation would impose an undue hardship on the UNC System Office by assessing whether the requested accommodation would cause significant difficulty or expense as provided by the Section 503 regulations.

If an employee with a known disability is having significant difficulty performing the job, and it is reasonable to conclude that the performance problem may be related to the known disability, the employee's supervisor will confidentially inform the employee of the performance problem, discuss with the employee the need to be able to perform the work, and invite the employee to discuss what type of assistance may be needed to be able to perform the work successfully. If the employee responds that a reasonable accommodation is needed, then the supervisor will consider the request for reasonable accommodation, which will enable the employee to perform the job as expected in accordance with those standards for all employees in the same or similar position(s). The UNC System Office will engage in an interactive process with the employee to assess alternatives for reasonable accommodation(s).

SECTION XI

HARASSMENT

41 CFR §60-741.44(e)

41 CFR §60-300.44(e)

The UNC System Office prohibits harassment or discrimination of its employees based on race, color, religion, sex, sexual orientation, gender identity, national origin, age, disability, genetic information, or veteran status. Employees who believe they have been harassed on one or more of these bases are urged to bring this to the attention of the supervisor or the EEO Officer immediately.

Any supervisor who witnesses such harassment or is otherwise informed of a violation of this policy is directed to bring this to the immediate attention of the EEO Officer. Failure of a supervisor (or others) with such knowledge to promptly advise a responsible UNC System Office official may be considered grounds for disciplinary or other administrative action, up to and including dismissal.

The investigation of any such complaint shall be carried out promptly and shall involve only those persons with a need to know.

Any employee found to have harassed another employee in violation of the UNC System Office's policy is subject to administrative or disciplinary action, up to and including dismissal or discharge, depending on the severity of the offense.

SECTION XII

MANDATORY JOB LISTING

41 CFR §60-300.5(a)(2)

Listing of SHRA employment openings with the North Carolina Division of Employment Security shall be made concurrently with the use of any other external recruitment sources or efforts.

The UNC System Office will externally advertise jobs to create broad-based pools of applicants. The President may directly determine appointments for certain senior positions without advertising. Only in exceptional circumstances will other positions be filled without posting or from an internal posting only within the organization. Such exceptions must be approved by the EEO Officer. These exceptions would include efforts to hire individuals with special skills not expected to be obtainable through an open search or to address urgent staffing needs or retention issues.

The UNC System Office will treat referrals from the North Carolina Division of Employment Security in the same way that it treats referrals from other sources. That is, such referrals may or may not be interviewed, consistent with the way that the UNC System Office determines to interview applicants who are referred by other means.

SECTION XIII

AUDIT AND REPORTING SYSTEM

41 CFR §§60-741.44(h) and -741.80

41 CFR §§60-300.44(h) and -300.80

The UNC System Office Talent Acquisition Consultant reviews all hiring actions in our recruitment and hiring system that contain demographic data and access to reports that help:

1. Measure the effectiveness of our plan;
2. Indicate any need for remedial action;
3. Assist in determining the degree to which our objectives have been attained; and
4. Measure our compliance with specific obligations.

Where problems are identified, the UNC System Office will undertake the necessary action to bring the program into compliance.

The UNC System Office retains all records relating to employment decisions, such as advertisements and postings, applications and résumés, interview notes, requests for accommodation, etc., in accordance with the University's Records Retention Schedule.

SECTION XIV
SUPPORTING DATA

41 CFR 60-300.44(h)

UNC System Office Self-Audit (VEVRAA)

VEVRAA AAP Component	Requirements	Last Inspection (Compliant (C)/ Not Compliant (NC))	Follow-up or remedial actions
Invitation to self-identify at the pre-offer stage (41 CFR 60-300.42(a))	The UNC System Office invites applicants to self-identify as a protected veteran pre-offer using a form that conforms to OFCCP requirements at 41 CFR 60-300.42(a) and (c).	April 1, 2019 (C)	
Invitation to self-identify at the post-offer stage (41 CFR 60-300.42(b))	The UNC System Office invites applicants to self-identify as a protected veteran post-offer using a form that conforms to OFCCP requirements at 41 CFR 60-300.42(b) and (c). System Office employees are provided an opportunity to self-identify as a protected veteran through an online reporting system at least annually.	April 1, 2019 (C)	
Policy Statement (41 CFR 60- 300.44(a))	Posted on bulletin boards.	April 1, 2019 (C)	
	Made available, as needed, in a form that is accessible and understandable to disabled veterans.	April 1, 2019 (C)	
	Contains required non-discrimination and non-retaliation statements.	April 1, 2019 (C)	
	Indicates top executive support for AAP.	April 1, 2019 (C)	
Review of Personnel Processes (41 CFR 60- 300.44(b))	The UNC System Office periodically reviews personnel processes using procedures designed to facilitate this review.	April 1, 2019 (C)	
Physical and Mental Qualifications (41 CFR 60-300.44(c))	The UNC System Office provides and adheres to a schedule for reviewing all physical and mental qualification standards in the AAP. Whenever a new position is created or an existing position is restudied due to changes in the role, physical and mental qualification standards are reviewed.	April 1, 2019 (C)	
	The UNC System Office demonstrates that if a physical/mental qualification standard tends to screen out qualified disabled veterans, the standards are job-related and consistent with business necessity.	April 1, 2019 (C)	

VEVRAA AAP Component	Requirements	Last Inspection (Compliant (C)/ Not Compliant (NC))	Follow-up or remedial actions
Reasonable Accommodations (41 CFR 60-300.44(d))	The UNC System Office provides reasonable accommodations for the known physical and mental limitations of otherwise qualified disabled veterans absent undue hardship.	April 1, 2019 (C)	
Harassment (41 CFR 60-300.44(e))	The UNC System Office has developed and implemented procedures to ensure employees are not harassed on the basis of protected veteran status and provided those procedures in the AAP.	April 1, 2019 (C)	
External dissemination of policy, outreach, and positive recruitment (41 CFR 60-300.44(f))	The UNC System Office undertakes appropriate outreach and positive recruitment activities that are reasonably designed to effectively recruit qualified protected veterans.	April 1, 2019 (C)	
	The UNC System Office documents all outreach and recruitment activities and retains such documents for a period of three years.	April 1, 2019 (C)	
	The UNC System Office conducts an assessment of each outreach and recruitment activity, and an assessment of the effectiveness of the totality of these activities that meets these requirements.	April 1, 2019 (C)	
	The UNC System Office conducts an overall assessment annually.	April 1, 2019 (C)	
	The UNC System Office documents criteria it uses in its assessment, which includes data collected pursuant to 41 CFR 60-300.44(k) for current year and the two most recent previous years.	April 1, 2019 (C)	
	The UNC System Office evaluates each outreach and recruitment activity using the criteria set out and comes to a reasonable conclusion as to whether each activity is effective in identifying and recruiting protected veterans.	April 1, 2019 (C)	
	The UNC System Office provides an assessment of its overall outreach and recruitment efforts and, if it concludes that these overall efforts are not effective, UNC System Office identifies and implements alternative efforts.	April 1, 2019 (C)	
	The UNC System Office documents these assessments and retains such documents for three years.	April 1, 2019 (C)	
Internal Dissemination of Policy (41 CFR 60-300.44(g))	The UNC System Office includes its affirmative action policy in the policy manual or make it otherwise available to employees.	April 1, 2019 (C)	

VEVRAA AAP Component	Requirements	Last Inspection (Compliant (C)/ Not Compliant (NC))	Follow-up or remedial actions
Audit and Reporting System (41 CFR 60-300.44(h))	The UNC System Office has designed and implemented an audit and reporting system that: (a) measures the effectiveness of the UNC System Office AAP, (b) indicates any need for remedial action, (c) determines whether the UNC System Office’s affirmative action objectives have been reached, (d) determines whether known protected veterans have had the opportunity to participate in all company sponsored educational, training, recreational and social activities, (e) and measures the UNC System Office’s compliance with the AAP’s specific objectives.	April 1, 2019 (C)	
	The UNC System Office documents actions taken to comply with audit and reporting obligations, retains these documents as employment records, and takes necessary action to bring its AAP into compliance if it finds any deficiencies.	April 1, 2019 (C)	
Responsibility for Implementation (41 CFR 60-300.44(i))	The UNC System Office assigns an official the responsibility for implementation of its AAP activities whose identity appears on all internal and external communications regarding the AAP and is supported by senior management and staff to implement the AAP.	April 1, 2019 (C)	
Training (41 CFR 60-300.44(j))	The UNC System Office trains all personnel involved in recruitment, screening, selection, promotion, disciplinary, and related processes to ensure AAP commitments are carried out.	April 1, 2019 (C)	
Data Collection Analysis (41 CFR 60-300.44(k))	The UNC System Office documents the following computations or comparisons pertaining to applicants and hires on an annual basis and maintains them for a period of three years: <ol style="list-style-type: none"> 1. The number of applicants who self-identified as protected veterans at the pre-offer stage of employment process; 2. The total number of job openings; 3. Total number of jobs filled; 4. The total number of applicants for all jobs; 5. The number of protected veteran applicants hired; 6. The total number of applicants hired. 	April 1, 2019 (C)	
Hiring Benchmarks (41 CFR 60-300.45)	The UNC System Office establishes a hiring benchmark annually using the hiring benchmark provided by OFCCP and uses this percentage in its assessments of the effectiveness of the UNC System Office’s outreach and recruitment efforts towards protected veterans.	April 1, 2019 (C)	

Personnel Activity (establishment-wide)

VEVRAA

Hires		Applicants		Promotions - Into Job Group		Terminations		Layoffs		Recalls	
Total	Vets	Total	Vets	Total	Vets	Total	Vets	Total	Vets	Total	Vets
59	2	1391	62	5	0	119	3	4	1	0	0

Applicant Flow Log

VEVRAA

[Withheld from distribution or public inspection to ensure confidentiality]

Name	Race/ Ethnicity	Sex	VET (Y/N)	Date of Application	Job Title	Interview (Y/N)	Action Taken (H/NH)	Date Action Taken

UNC System Office Self-Audit (Section 503)

SECTION 503 AAP Component	Requirements	Last Inspection Date Compliant (C) / Not Compliant (NC)	Follow-up or remedial actions
Invitation to self-identify at the pre-offer stage of employment process (41 CFR 60-741.42(a)(1) & (2))	The UNC System Office invites applicants to self-identify as an individual with a disability pre-offer using the invitation form provided by OFCCP.	April 1, 2019 (C)	
Invitation to self-identify at the post-offer stage of employment process (41 CFR 60-741.42(b)(1) & (2))	The UNC System Office invites applicants to self-identify as an individual with a disability post-offer using the invitation form provided by OFCCP.	April 1, 2019 (C)	
Employee invitation to self-identify (41 CFR 60- 741.42(c))	All UNC System Office employees are provided the opportunity to self-identify as an individual with a disability through an online reporting system at least annually.	April 1, 2019 (C)	
Policy Statement (41 CFR 60-741.44(a))	Posted on bulletin boards.	April 1, 2019 (C)	
	Made available, as needed, in a form that is accessible and understandable to individuals with disabilities.	April 1, 2019 (C)	
	Contains required non-discrimination and non-retaliation statements.	April 1, 2019 (C)	
	Indicates top executive support for AAP.	April 1, 2019 (C)	
Review of Personnel Processes (41 CFR 60- 741.44(b))	The UNC System Office conducts periodic review of personnel processes using procedures designed to facilitate review.	April 1, 2019 (C)	
	The UNC System Office provides necessary reasonable accommodations to ensure applicants and employees with disabilities receive equal opportunity in the operation of personnel processes.	April 1, 2019 (C)	
Physical and Mental Qualifications (41 CFR 60-741.44(c))	UNC System Office provides and adheres to a schedule for reviewing all physical and mental qualification standards in the AAP. When a new position is created or an existing position is restudied due to changes in the role, physical and mental qualification standards are reviewed.	April 1, 2019 (C)	
	UNC System Office demonstrates that, if a physical/mental qualification standard tends to screen out qualified individuals with disabilities, the standards are job-related and consistent with business necessity.	April 1, 2019 (C)	

SECTION 503 AAP Component	Requirements	Last Inspection Date Compliant (C) / Not Compliant (NC)	Follow-up or remedial actions
Reasonable Accommodations for Physical and Mental Limitations (41 CFR 60-741.44(d))	UNC System Office provides reasonable accommodations for known physical and mental limitations of otherwise qualified individuals with disabilities, absent undue hardship.	April 1, 2019 (C)	
Harassment (41 CFR 60-741.44(e))	UNC System Office has developed and implemented procedures to ensure employees are not harassed on the basis of disability and provided those procedures in the AAP.	April 1, 2019 (C)	
External dissemination of policy, outreach, and positive recruitment (41 CFR 60-741.44(f))	UNC System Office undertakes appropriate outreach and positive recruitment activities that are reasonably designed to recruit qualified individuals with disabilities effectively.	April 1, 2019 (C)	
	UNC System Office sends written notification of its affirmative action efforts to all subcontractors, including subcontracting vendors and suppliers, requesting appropriate action on their part.	April 1, 2019 (C)	
	UNC System Office documents all outreach and recruitment activities and retains such documents for a period as provided by its Records Retention Policy.	April 1, 2019 (C)	
External dissemination of policy, outreach, and positive recruitment (41 CFR 60-741.44(f))	The UNC System Office conducts an assessment of each outreach and recruitment activity, and an assessment of the effectiveness of the totality of these activities, that meets these requirements.	April 1, 2019 (C)	
	The UNC System Office conducts an overall assessment annually.	April 1, 2019 (C)	
	The UNC System Office documents criteria it uses in its assessment, including data collected pursuant to 41 CFR 60-741.44(k) for current year and the two most recent previous years.	April 1, 2019 (C)	
	The UNC System Office evaluates each outreach and recruitment activity using the set criteria and comes to a reasonable conclusion as to whether each activity is effective in identifying and recruiting qualified individuals with disabilities.	April 1, 2019 (C)	

SECTION 503 AAP Component	Requirements	Last Inspection Date Compliant (C) / Not Compliant (NC)	Follow-up or remedial actions
External dissemination of policy, outreach, and positive recruitment (41 CFR 60-741.44(f))	The UNC System Office provides an assessment of its overall outreach and recruitment efforts and, if it concludes that these overall efforts are not effective, FCI identifies and implements alternative efforts.	April 1, 2019 (C)	
	The UNC System Office documents these assessments and retains such documents for three years.	April 1, 2019 (C)	
Internal Dissemination of Policy (41 CFR 60-741.44(g))	The UNC System Office includes its affirmative action policy in the policy manual or makes it otherwise available to employees.	April 1, 2019 (C)	
Audit and Reporting System (41 CFR 60-741.44(h))	The UNC System Office has designed and implemented an audit and reporting system that: <ol style="list-style-type: none"> 1. Measures the effectiveness of the UNC System Office's AAP, 2. Indicates any need for remedial action, 3. Determines whether the UNC System Office's affirmative action objectives have been reached, 4. Determines whether known individuals with disabilities have had the opportunity to participate in all company sponsored educational, training, recreational and social activities, and 5. Measures the UNC System Office's compliance with the AAP's specific objectives. 	April 1, 2019 (C)	
Audit and Reporting System (41 CFR 60-741.44(h))	The UNC System Office documents the actions it takes to comply with audit and reporting system obligations. It retains these documents as employment records (see § 60-741.80). The UNC System Office undertakes necessary action to bring AAP into compliance if it finds any deficiencies.	April 1, 2019 (C)	
Responsibility for Implementation (41 CFR 60-741.44(i))	The UNC System Office assigns to an official who is responsible for implementation of its AAP activities and whose identity appears on all internal and external communications regarding the AAP and is supported by senior management and staff to implement the AAP.	April 1, 2019 (C)	

SECTION 503 AAP Component	Requirements	Last Inspection Date Compliant (C) / Not Compliant (NC)	Follow-up or remedial actions
Training (41 CFR 60-741.44(j))	The UNC System Office trains all personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes to ensure the commitments in the AAP are carried out.	April 1, 2019 (C)	
Data Collection Analysis (41 CFR 60-741.44(k))	The UNC System Office documents the following computations or comparisons pertaining to applicants and hires on an annual basis and maintains them for a period of three years: <ol style="list-style-type: none"> 1. Total number of applicants who self-identified as individuals with disabilities at the pre-offer stage of the employment process (§ 60-741.42(a)); 2. Total number of job openings; 3. Total number of jobs filled; 4. Total number of applicants for all jobs; 5. The number of applicants with disabilities hired; 6. The total number of applicants hired. 	April 1, 2019 (C)	
Utilization goals (41 CFR 60-741.45)	The UNC System Office establishes the utilization goal provided by OFCCP for the employment of individuals with disabilities for each job group in the UNC System Office's workforce and uses this percentage in its assessment of the effectiveness of outreach and recruitment efforts towards individuals with disabilities.	April 1, 2019 (C)	

SECTION XV

APPLICANT AND HIRING DATA

41 CFR §§60-741.44(k)

41 CFR §§60-300.44(k)

[Withheld from distribution or public inspection to ensure confidentiality]

Protected Veterans

The UNC System Office engages in positive outreach and recruitment for protected veterans as required by OFCCP regulations. To comply with requirements of 41 CFR 60-300.44(k), it has modified its applicant flow logs and has adopted OFCCP's current 5.9% hiring benchmark goal for protected veterans. The UNC System Office collects employee data pertaining to protected veterans in order to assess the effectiveness of the UNC System Office's outreach and recruitment efforts. The UNC System Office invites applicants to voluntarily report whether they believe they are protected veterans in compliance with the VEVRAA requirements.

The UNC System Office shall document the following pertaining to applicants and hires on an annual basis and maintain them for a period of three years:

1. The number of applicants who self-identify as protected veterans
2. The total number of job openings and total number of jobs filled
3. The total number of applicants for all jobs
4. The number of protected veteran applicants hired
5. The total number of applicants hired

Applicant/Hiring Data	2016	2017	2018
Number of applicants who self-identify as protected veterans before an offer of employment is made	86	94	62
Total number of job openings	122	80	78
Total number of jobs filled	68	82	59
Total number of applicants for all jobs	1947	2165	1391
Number of protected veteran applicants hired	3	1	2
Total number of applicants hired	74	82	59

Individuals with Disabilities

The UNC System Office maintains data regarding the recruitment and hiring of those who self-identify as individuals with disabilities. The UNC System Office uses this data to evaluate the representation of individuals with disabilities in its workforce. The UNC System Office assesses its efforts to attain OFCCP's aspirational 7% utilization goal for the recruitment of individuals with disabilities on an annual basis. The UNC System Office invites applicants to voluntarily report whether they believe they are individuals with disabilities in compliance with the Section 503 requirements.

The UNC System Office shall document the following pertaining to applicants and hires on an annual basis and maintain them for a period of three years:

1. The number of applicants who self-identify as individuals with disabilities
2. The total number of job openings and total number of jobs filled
3. The total number of applicants for all jobs
4. The number of applicants with disabilities hired
5. The total number of applicants hired

Applicant/Hiring Data	2016	2017	2018
Number of applicants who self-identify with disabilities before an offer of employment is made	167	36	47
Total number of job openings	122	80	78
Total number of jobs filled	68	82	59
Total number of applicants for all jobs	1947	2165	1391
Number of applicants with disabilities hired	2	1	0
Total number of applicants hired	74	82	59

SECTION XVI

OUTREACH AND POSITIVE RECRUITMENT

41 CFR 60-300.44(f)

41 CFR 60-741.44(f)

Data Collection and Analysis for Protected Veterans

The UNC System Office will evaluate the results of each outreach and recruitment activity for protected veterans using the following criteria, which includes data collected under 41 CFR 60-300.44(k), to see if it is producing measurable results:

1. Did the activity attract qualified applicants with protected veteran status?
2. Did the activity result in the hiring of qualified individuals with protected status?
3. Did the activity expand the UNC System Office’s outreach to individuals with protected status in the community?
4. Did the activity increase our ability to include individuals with protected veteran status in our workforce?

Activity	Did activity attract qualified applicants with protected veteran status?	Did activity result in hiring of qualified individuals with protected status?	Did activity expand our outreach to individuals with protected status in the community?	Did activity increase our ability to include individuals with protected status in its workforce?
Send all postings to Local Job Network’s list of veteran organizations (ongoing)	Unknown	Unknown	Yes	Yes
All positions are listed on US Military Pipeline	Unknown	Unknown	Yes	Yes
Posted positions to Hire Our Heroes	Unknown	Unknown	Yes	Yes
Posted positions to NC4ME (North Carolina for Military Employment)	Unknown	Unknown	Yes	Yes
Attended DAV and RecruitMilitary Job Fair	Unknown	Unknown	Yes	Yes
Attended Fayetteville State University Job Fair	Unknown	Unknown	Yes	Yes

Some examples of the outreach efforts to organizations for veterans where the UNC System Office’s job postings are regularly sent include:

Veteran Organization	Location
Alamance County Veteran Services	Graham, NC
Army Career and Alumni Program (ACAP) - Fort Bragg - 82nd Airborne	Fort Bragg, NC
Capital Area NCWorks at Raleigh	Raleigh, NC
Chatham County Veteran Services	Siler City, NC
Cumberland County Veteran Services	Fayetteville, NC
Division of Employment Security - Central Office	Raleigh, NC
Durham County Veteran Services	Durham, NC
Durham JobLink Career Center - Veteran Services	Durham, NC
Franklin County Veteran Services	Louisburg, NC
Granville County JobLink Career Center - Veteran Services	Oxford, NC
Harnett County Veteran Services	Lillington, NC
Hoke County Veteran Services	Raeford, NC
Johnston County Veteran Services	Smithfield, NC
Lee County Veteran Services	Sanford, NC
North Carolina Division of Veterans Affairs	Raleigh, NC
Disabled American Veterans - Vance County Chapter #97	Fayetteville, NC
Orange County JobLink Career Center - Veteran Services	Chapel Hill, NC
Orange County Veteran Services	Hillsborough, NC
Person County Veteran Services	Roxboro, NC
Raleigh Vet Center	Raleigh, NC
Rockingham County Veteran Services	Wentworth, NC
Wake County Veteran Services	Raleigh, NC
Warren County Veteran Services	Warrenton, NC
US Military Pipeline (job posting online website)	National

The UNC System Office will continue to expand its outreach and positive recruitment efforts in 2019.

Data Collection and Analysis for Individuals with Disabilities

The University of North Carolina System Office evaluates the totality of its outreach and recruitment efforts over the prior twelve months based on the following criteria:

1. Did the activity attract qualified applicants with disabilities?
2. Did the activity result in the hiring of qualified individuals with disabilities?
3. Did the activity expand the UNC System Office’s outreach to individuals with disabilities in the community?
4. Did the activity increase the UNC System Office’s ability to include individuals with disabilities in its workforce?

UNC System Office also uses Local Job Network to help us expand our reach to individuals with disabilities seeking employment. This activity is ongoing. Some examples of the outreach areas for individuals with disabilities where UNC System Office’s job postings are regularly sent include:

People with Disabilities	Location
All positions are listed on NorthCarolinaDiversity.com	website
Alliance of Disability Advocates – ADA	Raleigh, NC
Disability Rights North Carolina	Raleigh, NC
NC Division of Services for the Blind - Winston-Salem District Office	Winston Salem, NC
The Arc of Alamance County	Burlington, NC
The Arc of Durham County	Durham, NC
Virginia Vocational Rehabilitation - South Boston Office	South Boston, VA
Disabled American Veterans – Vance County Chapter #97	Fayetteville, NC
Vocational Rehabilitation Offices	North Carolina locations: Clinton, Concord, Durham, Elizabeth City, Henderson, Hickory, High Point, Lincolnton, Marion, Marshall, Newland, North Wilkesboro, Pinehurst, Roanoke Rapids.

The UNC System Office will continue to expand its outreach and positive recruitment efforts in 2019.

SECTION XVII

UTILIZATION ANALYSIS

41 CFR §60-741.45(d)

41 CFR §60-741.45(d)(2)

UNC System Office Human Resources reviews job group assignments at least biennially to ensure UNC System Office job titles were assigned to the appropriate job group codes. (Exhibit 13). The utilization analysis is found in Exhibits 12, 14, and 15. In cases where employment was below availability, further analysis was conducted to determine if there was underutilization. Job groups have been identified which have placement goals for women and minorities, veterans, and individuals with disabilities. The statistical method used to determine underutilization by comparing employment with availability was two standard deviations supplemented by binomial probability for groups with fewer than thirty members.

All placement goals are set to be equal to availability and good faith efforts will be made to attain these goals. We want to emphasize that these goals are not quotas, which are prohibited by statute (41 C.F.R. § 60-2.16(e)).

SECTION XVIII

OTHER MATTERS

As required by applicable regulations, the UNC System Office:

1. Will include the equal opportunity clause in each of our covered contracts and purchase orders, either in totality or by incorporation by reference. *41 CFR §60-741.5, 41 CFR §60-300.5*
2. Will post in conspicuous places, available to applicants and employees, notices in the form prescribed by the Department of Labor, which state the UNC System Office's obligation under the law to refrain from discrimination and to engage in affirmative action with respect to qualified individuals with disabilities and qualified protected veterans. *41 CFR §60-741.5, 41 CFR §60-300.5*
3. Will not, when employing or promoting qualified protected veterans, reduce the amount of compensation offered because of any disability income, pension, or other benefit the applicant or employee receives from another source. *41 CFR §60-741.21(i), 41 CFR §60-300.21(i)*
4. Will not deny a qualified individual with a disability equal access to insurance or subject such individual to different terms or conditions of insurance based on disability alone, if the disability does not pose increased risks. *41 CFR §60-741.25, 41 CFR §60-300.25*
5. Will make this Affirmative Action Plan available on our website.

SECTION XIX

EXHIBITS

1. *The Code* of The University of North Carolina System - Section 103
Equality of Opportunity in the University
2. President's Statement of Commitment to Affirmative Action and Equal Employment
Opportunity
3. State Equal Employment Opportunity Policy
4. SHRA Recruitment and Selection Policy
5. State SHRA Career Banding Salary Administration Policy
6. State SHRA Reduction in Force Policy
7. State of North Carolina General Contract Terms and Conditions
8. Work Force Analysis
9. Job Group Analysis
10. Reasonable Recruitment Area Availabilities
11. Incumbency v. Estimated Availability
12. Annual Placement Goals
13. Job Groups, EEO Codes, and Census Occupations Assigned to Job Titles
14. Veteran Incumbency v. Benchmark Summary
15. Disability Incumbency v. Goal Summary
16. Notice of Right of Inspection