



VIRGINIA COMMONWEALTH UNIVERSITY
AFFIRMATIVE ACTION PROGRAM
FOR
PERSONS WITH DISABILITIES
AND
COVERED VETERANS
41CFR 60

(NARRATIVE)

July 1, 2002 to June 30, 2003

Approved by:

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President

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STATEMENT OF UNIVERSITY POLICY CONCERNING INDIVIDUALS WITH DISABILITIES, DISABLED VETERANS, AND OTHER COVERED VETERANS

It has been a long-standing policy of Virginia Commonwealth University to employ and promote qualified personnel without discrimination against any employee or applicant for employment because of a physical or mental disability, special disabled veteran status, or veteran status.

Our policy is to initiate affirmative action to employ, advance in employment, and otherwise treat qualified disabled individuals, special disabled veterans, and covered veterans without discrimination in the employment process. Our commitment to affirmative action is stated in this policy so that all employees, prospective employees, sources of employment, customers and suppliers, and community leaders are aware of VCU's position.

Periodically, VCU studies existing physical barriers and safety hazards to veterans and disabled individuals so that we may make reasonable accommodations for the physical and mental limitations of employees and applicants, consistent with required job qualifications and the effective operation of the university.

All applicants or employees who are disabled, special disabled veterans, or other covered veterans who wish to benefit from the program are invited to identify themselves to VCU through the Office of EEO/AA Services. Such information is voluntarily provided, is kept confidential, and will not subject the person to any adverse treatment. Employees and applicants shall not be subjected to harassment, intimidation, threats, coercion, or discrimination because they have (1) filed a complaint, (2) assisted or participated in an investigation, compliance evaluation, hearing, or other activity related to the administration of this Affirmative Action Plan, or (3) opposed any act or practice made unlawful by the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended.

To ensure the effectiveness of this affirmative action program, VCU has appointed Velma Jackson-Williams, Director, EEO/AA Services, as the officer for affirmative action for individuals with disabilities, disabled veterans, and covered veterans. A copy of this affirmative action plan may be inspected during normal business hours by contacting her.

Virginia Commonwealth University

Dr. Eugene P. Trani
President

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Affirmative Action Program for Covered Veterans, including Veterans of the Vietnam Era, Special Disabled Veterans, Qualified Special Disabled Veterans, Other Veterans, and Persons With Disabilities.

60-250.4 and 60-741.4

- (a) VCU will not discriminate against any employee or applicant for employment who is a covered veteran or has a disability in regard to any position for which the employee or applicant for employment is qualified. VCU agrees to take affirmative action to employ, advance in employment and otherwise treat covered veterans and persons with a disability without discrimination based upon their disability or veterans status in all employment practices.
- (b) VCU agrees that all suitable employment openings of the contractor that exist at the time of execution of this contract and those which occur during the performance of this contract shall be listed at the appropriate local office of the Virginia State Employment Service svstem.
- (c) VCU agrees to post in conspicuous places notices required or provided by the Director and/or the contracting officer.
- (d) VCU will notify each labor union or representative of workers with which it has a collective bargaining agreement of the terms of the Vietnam Era Veterans Readjustment Assistance Act, as amended and the Rehabilitation Act of 1973, as amended.
- (e) VCU will include the Equal Opportunity clause in every subcontract or purchase order of \$10,000 or more so that such provisions will be binding on the subcontractor or vendor.

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60-250.5 and 741.5

- (a) The full Affirmative Action Program is available for inspection upon request.
 - (b) An invitation has been posted inviting all covered veterans and persons with a disability who wish to benefit under the Affirmative Action Program to identify themselves. VCU has identified and will track those employees who have made their disabilities known through self-identification, records of a disability or are regarded as having an impairment that substantially limits their employment opportunities to employment.
 - (c) Invitations to self-identify are extended to all applicants post-offer, but prior to employment.
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60-250.6 and 741.6

- (a) VCU has developed an Affirmative Action Policy that includes the obligation to take Affirmative Action to employ and advance in employment covered veterans and persons with a disability at all levels of employment.
- (b) The personnel processes are reviewed annually to insure that current procedures assure careful, thorough and systemic consideration of the job qualifications of known covered veterans and persons with a disability who apply for job openings filled either by hiring or promotion, and for all training opportunities offered or available.
- (c) An annual review of all physical and mental job qualifications is conducted to insure that job qualifications do not screen out qualified special disabled veterans or persons with a disability.
- (d) Reasonable accommodation for the physical or mental limitations of special disabled veterans and persons with a disability is considered at the time of application for hire, promotion, training, or other personnel activity.
- (e) Compensation is not reduced or adjusted in any employment offer because of any disability income, pension or other benefit that the employee or applicant receives.
- (f) Outreach, positive recruitment and external dissemination has included:
 - Recruiting sources will be notified and informed of our Affirmative Action Policy. These sources will be encouraged to refer for our consideration qualified persons with a disability and applicable veterans for all of our positions. The following organizations will be contacted for possible job candidates:

⇒ **Commonwealth of Virginia, Employment Commission**

⇒ **Commonwealth of Virginia, Department of Rehabilitative Services**

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(g) Internal dissemination has included:

- 1) The inclusion of our Affirmative Action Policy in VCU's policy manual.
- 2) The inclusion of our Affirmative Action Policy in VCU's employee newsletter.
- 3) An annual meeting of executive, management and supervisory personnel will include as part of the agenda the intent of the Affirmative Action Policy, individual responsibilities for effective implementation of the program and the President's commitment to the program.
- 4) The policy has been posted on VCU's bulletin boards, including a protection clause for persons filing a complaint or assisting in an investigation.
- 5) All employees are notified of VCU's commitment to engage in Affirmative Action.
- 6) In our dissemination programs, both internal and external, we include both veterans and persons with a disability in compliance with 60.741.6(1) and (g) and 60.250.6 (f) and (g).
- 7) VCU's Affirmative Action Policy will be included in any Personnel Policy Manual or Employee Handbook.
- 8) Meetings will be held with all supervisory and management personnel on an annual basis. Policy and individual responsibility as it relates to Equal Employment Opportunity are discussed at these meetings.
- 9) At the time of employment orientation, the policy is discussed and is reaffirmed in written format.
- 10) In all cases within the bargaining unit involving promotion, demotion, layoff, and recall in cases involving layoffs, seniority shall be a determining factor, providing the employee has the necessary skill, ability and physical fitness to perform the work available in a reasonably satisfactory manner.

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- h) Velma Jackson-Williams, Director, EEO/AA Services, has been appointed as the Equal Employment Opportunity Coordinator.

The responsibilities of that position may include:

- 1) Developing policy statements, Affirmative Action Programs, internal and external communication techniques.
- 2) Assisting in the identification of problem areas.
- 3) Assisting management in arriving at solutions to problems.
- 4) Designing and implementing audit and reporting systems that will:
 - a) measure effectiveness of VCU's programs;
 - b) indicate need for remedial action;
 - c) determine the degree to which the contractor's goals and objectives have been attained.
- 5) Serve as liaison between VCU and enforcement agencies.
- 6) Serve as liaison between VCU and veterans' organizations and community action groups concerned with employment opportunities for persons with a disability.
- 7) Keep management informed of latest developments in the equal opportunity arena.

Management responsibilities will include:

- 1) Assistance in the identification of problem areas and establishment of local and unit goals and objectives.
- 2) Awareness of local veterans' organizations, organizations concerned with persons with a disability, community action groups and community service programs.

3) Periodic auditing of training programs, hiring and promotion patterns to remove impediments to the attainment of goals and objectives.

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- 4) Regular discussions with front line managers, supervisors, and employees to be certain VCU's policies are being followed.
- 5) Review of the qualifications of all employees to insure that covered veterans and persons with a disability are given full opportunities for transfers and promotions.
- 6) Career counseling for all employees.
- 7) Periodic audits to insure that each location is in compliance in areas such as:
 - a) EEO posters are properly displayed;
 - b) Facilities that are maintained for the use and benefit of its students and/or employees, are accessible for persons with a disability, both in policy and in use.
 - c) veterans and persons with a disability are afforded a full opportunity and are encouraged to participate in VCU sponsored educational, training, recreational, and social activities.
- 8) Managers and supervisors are made to understand that their work performance is evaluated on the basis of their equal opportunity efforts and results, as well as other criteria.
- 9) It is the responsibility of supervisors to take action to prevent harassment of employees placed through Affirmative Action efforts.
- 10) The Director of EEO/AA Services shall ensure that the "Federal Contractor Veteran's Employment Report VETS-100", required under 41 CFR 60-250.10, is filed by September 30th or by an alternate date provided by the United States Government.
- 11) The Director of EEO/AA Services shall ensure that the provisions in the Americans with Disabilities Act of 1990 have been implemented.

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i) Development and Execution of the Program

1) The selection process is periodically evaluated to insure freedom from bias. Personnel involved in the recruiting, screening, selection, promotion, disciplinary and related process have been carefully selected and trained.

2) Promotions

We will insure that all employees are given equal opportunity for promotion by:

- a. posting or announcing promotional opportunities
- b. initiating job training and work-study programs, if needed
- c. implementing employee evaluation programs
- d. ensuring that job specifications are clearly defined

3) Career Counseling

- a. Career counseling may be made available to personnel.
- b. Employees may be counseled periodically relative to advancement opportunities open to them and the training programs available to assist them in their career development.
- c. Managers and supervisors should keep the Director of EEO/AA Services informed of all action taken in career counseling.

4) Training

All career improvement training programs and educational opportunities are available and open to all employees. All employees, including applicable veterans and persons with a disability are encouraged to take advantage of these opportunities.

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5) Recruitment

In an effort to improve recruitment and increase the flow of minority and female applicants, we will, wherever possible:

- a. Solicit persons with a disability and veterans' organizations for referral of applicants.
- b. Conduct briefings on our premises with representatives from recruiting sources concerning current and future job openings.
- c. Encourage minority, female, veteran and disabled employees to refer applicants for classified and faculty vacancies.
- d. Participate in outreach programs and career days, using veterans and disabled employees whenever possible.
- e. Participate in recruiting efforts at all schools and other organizations with special programs to reach veterans and persons with a disability.

In addition, recruiting efforts may focus on organizations within the normal recruiting area representing organizations that are concerned with veterans and persons with a disability. Such groups may include:

- Disabled Veterans Organizations
- Veterans Administration Center
- Commonwealth of Virginia Employment Commission
- Commonwealth of Virginia Rehabilitative Services

6) The Director of EEO/AA Services has the responsibility to serve as liaison between VCU and enforcement agencies, community action groups, veterans' organizations, State Employment Commission, and organizations for persons with a disability, concerned with the employment opportunities of veterans and individuals with a disability.

7) The Human Resources Department also performs career counseling for employees as a part of their day-to-day responsibilities. This would include counseling for veterans and individuals with a disability