



VIRGINIA COMMONWEALTH UNIVERSITY
AFFIRMATIVE ACTION PROGRAM
FOR
MINORITIES AND WOMEN
41CFR 60

(NARRATIVE)

July 1, 2002 to June 30, 2003

Approved by:

Dr. Eugene P. Trani

President

Ms. Velma Jackson-Williams

Director of EEO/AA Services

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EIN#



To the university community

Dear Colleagues:

I ask for your assistance in implementing Virginia Commonwealth University's Affirmative Action Program by actively supporting the commitments outlined in this document. Maintaining, supporting, and expanding the university's commitment to those principles is a top priority at VCU. As a comprehensive, public university and a major employer in the Richmond metropolitan area, VCU takes very seriously its obligation to ensuring equal access to employment, education and services to all who step onto our campuses.

This Affirmative Action Plan narrative is being provided to you as a guide for implementing the university's general policies and procedures as we all work towards the goal of providing equal opportunities to those individuals that historically have not had sufficient access to employment and education.

Anyone seeking additional information about VCU's Affirmative Action Program and nondiscrimination policies may contact:

Office of EEO/AA Services
901 West Franklin St.
Ginter House-Room 114
Richmond, VA 23284-3022
(804) 828-1347

Our long-term commitment to the principles of affirmative action and equal opportunity will help to ensure a fair and secure future for the VCU community.

Sincerely,

Eugene P. Trani, Ph.D.
President

VIRGINIA COMMONWEALTH UNIVERSITY

AFFIRMATIVE ACTION PROGRAM

Issued By: *V. Jackson-Williams*

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2002/ 2003 Program

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Issued By: *V. Jackson-Williams* Chapter: *Introduction* Subject: **DISCLAIMER**

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Disclaimer

These Affirmative Action Programs, or any part thereof, does not constitute an admission by Virginia Commonwealth University (herein referred to as VCU) of any violation of the President's Executive Order 11246, as amended, Title VII of the Civil Rights Act of 1964, the Civil Rights Act of 1991, the Rehabilitation Act of 1973, as amended, the Vietnam Era Veterans Readjustment Act of 1974, as amended, the Americans With Disabilities Act, or of any Federal, State or local law.

These programs reaffirm the policy of providing Equal Employment Opportunity for all persons without regard to race, color, religion, sex, age, national origin, sexual orientation, physical or mental disability, status as a special disabled veteran, Vietnam Era veteran, or other covered veteran.

These programs are not used to discriminate against any applicant or employee because of race, color, religion, sex, age, national origin, sexual orientation, physical or mental disability, status as a special disabled veteran, Vietnam Era veteran, or other covered veteran. Placement goals are established to try to insure that affirmative action obligations are met.

It is the position of VCU that certain portions of this Affirmative Action Program constitute trade secrets and commercial information obtained from a person, and is privileged or confidential within the meaning of Section 552 (b) (4) of the Freedom of Information Act (5 U.S.C. 552 et seq.), and likewise, constitute trade secrets or confidential statistical and business data within the meaning of the Trade Secrets Act, 18 U.S.C. 1985. Specifically, the Workforce Analysis, Job Group Analysis, Comparison Analysis, Placement Goals, and the Identification of Problem Areas constitute confidential information under the above-cited statutes.

It is our understanding that VCU will be notified in the event that OFCCP receives a request from any person or entity for access to, or copies of, and information furnished by VCU pursuant to Executive Order 11246, as amended by Executive Order 11375, Section 503 of the Rehabilitation Act of 1973, 38 USC 4212 of the Vietnam Veterans Readjustment Act of 1974, as amended, and the rules and regulations promulgated thereunder, and that VCU will be afforded an opportunity to demonstrate why all or part of such requested information should not be disclosed.

The terms "problem area" and "underutilization," appearing in this Affirmative Action Plan, are terms the university is required to use herein by government regulations. The criteria used in relation to these terms are those specified by the government. The terms have no independent legal or factual significance whatsoever. Although we will use the terms in total good faith in connection with the Affirmative Action Plan, such usage does not necessarily signify that the university agrees that the terms are properly applied to any particular factual situation. Whenever the term "goal" is

used, it is expressly intended that it “not adversely affect an individual’s employment status on the basis of that person’s race, color, religion, sex, or national origin”, as stated in 41 *CFR* sec. 60-216. This Affirmative Action Plan is not intended to create any rights in any person or entity other than the relevant contracting government entity.

**Virginia Commonwealth University
History**

Virginia Commonwealth University is a public, research university located in the capital of the state, Richmond, Virginia. It is composed of two campuses: the Medical College of Virginia Campus located near the financial, governmental and retail district in downtown Richmond and the Academic Campus situated two miles west in the historic Fan District. It is ranked as a Carnegie Doctoral/Research University-Extensive, one of only three in the Commonwealth of Virginia.

The university takes its founding date of 1838 from the year the Medical College of Virginia (MCV) was created as the medical department of Hampden-Sydney College. MCV became independent in 1854 and state-affiliated in 1860.

VCU's Academic Campus began in 1917 as the Richmond School of Social Work and Public Health. In 1925, it became the Richmond division of the College of William and Mary; and in 1939, its name was changed to Richmond Professional Institute (RPI). It separated from William and Mary in 1962 to become an independent state institution.

In 1968, MCV and RPI merged to become Virginia Commonwealth University, the most comprehensive urban university in the state and one of the top research universities in the nation.

VCU OFFICE/BUILDING LOCATIONS

<u>BUILDING</u>	<u>ADDRESS</u>
Academic Success Ctr.	109 N. Harrison
Adkins House	824 Park Avenue
Alumni House	924 W. Franklin
Anderson Gallery	907 1/2 W. Franklin St.
Anderson House	913 W. Franklin St.
Bird House	820 W. Franklin St.
Blanton House	828 W. Franklin St.
Bocock House	909 W. Franklin St.
Bookstore-E2	1111 W. Broad St.
Bowe House	917 W. Franklin St.
Buford House	922 W. Franklin St.
Business Services	1111 W. Broad St.
Cabell Library	901 Park Avenue
Capital Planning	1000 W. Franklin St.
Cary Street Gym	911 W. Cary St.
Dance Administration	1315 Floyd Avenue
Dance Studio	10 N. Brunswick St.
Dept. of Public Safety	938-40 W. Grace St.
Fire & Safety	1312 W. Main St.
Flowers Building	327 W. Main St.
Flowers Building 2nd Fl. Headstart	327 W. Main St.
Founder's Hall-Continuing Studies	827 W. Franklin St.
Founder's Hall-Registration	827 W. Franklin St.
Franklin Street Gym	817 W. Franklin St.
Franklin Terrace-Art Foundation	812-14 W. Franklin St.
Ginter House	901 W. Franklin St.
Gladding Residence Center	711 W. Main St.
Harrison House	816 W. Franklin St.
Hibbs Building	900 Park Avenue
Hibbs Building-Food Services	1100 W. Broad St.
Highway Equipment	1500 W. Broad St.
Hunton House	810 W. Franklin St.
Internal Audit	944 W. Grace St.
Johnson Hall	801 W. Franklin St.
Kearney House	921 W. Franklin St.
Lafayette Hall	312 N. Shafer St.

<u>BUILDING</u>	<u>ADDRESS</u>
Life Sciences Building	816 Park Avenue
Lindsey House	600 W. Franklin St.
McAdams House	914 W. Franklin St.
Meeting Center	101 N. Harrison St.
Meredith House	1014 W. Franklin St.
Military Science Building	6-8 N. Harrison St.
Millhiser House	916 W. Franklin St.
Music Center	1015 Grove Avenue
Oliver Hall-Education	1015 W. Main St.
Oliver Hall-Education	1015 W. Main St.
Oliver Hall-Physics	1001 W. Main St.
Oliver Hall-Science	1001 W. Main St.
Oliver Hall-Science	1001 W. Main St.
Performing Arts Center-East Side	922 Park Avenue
Performing Arts Center-West Side	922 Park Avenue
Pollak Building	325 N. Harrison St.
President's House	910 W. Franklin St.
President's Residence	4700 Charmian Road
Raleigh Building	1001 W. Franklin St.
Research & Training	1314 W. Main St.
Rhoads Hall	710 W. Franklin St.
Ritter-Hickok House	821 W. Franklin St.
Scherer Hall	923 W. Franklin St.
School of Business	1015 Floyd Avenue
School of Engineering	601 W. Main St.
School of Engineering-Clean Room	601 W. Main St.
School of the Arts 1st Floor	1000 W. Broad St.
School of the Arts 2nd Floor	1000 W. Broad St.
School of the Arts 3rd Floor	1000 W. Broad St.
Shafer Street Playhouse	221 N. Shafer St.
Siegel Center	1200 W. Broad St.
Sitterding House	901 Floyd Avenue
Sports Medicine Center Suite 201	1805 Monument Ave.
Stagg House	912 W. Franklin St.
Stark House	915 W. Franklin St.
Stark House	915 W. Franklin St.
Stokes House-Police	918 W. Franklin St.
Student Commons	907 Floyd Avenue
Temple Building-Lecture Hall	901 W. Main St.
Thurston House	808 W. Franklin St.
Valentine House	920 W. Franklin St.
VCU Day Care Center	1128 Floyd Avenue
VIDD	700 E. Franklin St., 10th Fl.
VISSTA	102-04-06 N. Linden St.
VISSTA	102-04 N. Linden St.
Welcome Center	1111 W. Broad St.
White House	806 W. Franklin St.
Williams House	800 W. Franklin St.
Younger House	919 W. Franklin St.

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(Summary)

University Organization

Provost and VP Academic Affairs

Finance and Administration Division

Advancement Division

Government and Community Relations Division

Health Sciences Division

Research Division

University Outreach Division

VCU's organizational profile for each of the major divisions listed above can be viewed by visiting:

<http://www.vcu.edu/ireweb/charts97/>

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Subject: **RESPONSIBILITIES OF
DIRECTOR EEO/AA SERVICES
(41 CFR 60-2.17)**

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The Director of EEO/AA Services has been appointed as VCU's Equal Employment Opportunity Coordinator and has the authority, resources, support of and access to top management to ensure the effective implementation of the Affirmative Action Program.

Having been assigned by the president of the university, and having been assured of complete cooperation, the Director of EEO/AA Services shall have or may delegate the following responsibilities:

- 1) Develop policy statements and programs of affirmative action.
- 2) Discuss with officers, managers and supervisors the responsibilities of the university in order to comply with the laws and regulations pertaining to Affirmative Action Programs.
- 3) Develop and execute internal and external communication techniques.
- 4) Identify problem areas.
- 5) Recommend and assist in arriving at solutions to such problem areas.
- 6) Measure and report effectiveness of the Affirmative Action Program to the President.
- 7) Recommend remedial action when required.
- 8) Serve as liaison between management and:
 - (a) enforcement agencies
 - (b) minority organizations
 - (c) women's organizations
 - (d) community action groups
 - (e) veterans' organizations
 - (f) state employment offices
 - (g) organizations for persons with disabilities

- 9) Provide career counseling for employees.
- 10) Conduct regular inspections to assure that required posters are properly displayed.

VIRGINIA COMMONWEALTH UNIVERSITY *AFFIRMATIVE ACTION PROGRAM*

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1) Position Descriptions

Develop position specifications using essential function criteria. Job requirements include education, experience and skill requirements necessary to qualify for the job opening. Position specifications are distributed to referral sources.

2) Hiring-Selection

- a) Evaluate selection process periodically to ensure freedom from bias. Select and train personnel involved in the recruiting, screening, selection, promotion, and disciplinary and related processes. The recruiting, screening, referral, and selection process must demonstrate a good faith effort to remove identified barriers, expand employment opportunities, and produce results that are measurable.
- b) Observe the requirements of the "OFCCP Uniform Guidelines on Employee Selection Procedures" by performing periodic audits of personnel activities and the retention of records if adverse impact of minorities or women is noted.
- c) Monitor the process used to refer applicants to managers for hiring consideration to ensure the process is nondiscriminatory.

3) Compensation System(s)

Review compensation systems periodically to determine where there are apparent gender, race, or ethnicity based disparities. Where disparities cannot be justified in terms of performance, length of service, etc., corrective actions will be taken.

4) Recruitment Efforts

Establish recruitment efforts to maintain the flow of minority and female applicants:

- a) Solicit minority, women's, veterans' and organizations concerned with persons with disabilities for referral of applicants.
- b) Offer briefings on premises with representatives from recruitment sources concerning current and future job openings.

VIRGINIA COMMONWEALTH UNIVERSITY *AFFIRMATIVE ACTION PROGRAM*

Issued By: *V. Jackson-Williams*

Chapter: *IV*

Subject: **DEVELOPMENT &
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(41 CFR 60-2.17)**

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- c) Encourage minority, female, veteran, and employees with disabilities to refer applicants for employment.
 - d) Participate in career day programs, using minority and female employees whenever possible.
 - e) Expand job vacancy advertisements to include minority news media and women's interest media;
 - f) Establish recruitment efforts for organizations with special programs to reach minorities, women and persons with disabilities.
 - g) Expand applicant pool with job vacancy advertisements to include minority news media and women's interest media, especially for those job groups with Placement Goals.
 - h) Promote community childcare, housing and transportation programs designed to improve the employment opportunities for minorities, women and persons with disabilities.
 - i) Ensure that job openings have been listed with the Virginia Employment Commission.
- 5) Promotions
- Ensure that all employees are given equal opportunity for promotion:
- a) Communicate promotional opportunities.
 - b) Maintain an inventory of academic skills and experience levels.
 - c) Initiate job training and work-study programs whenever possible.
 - d) Conduct employee performance evaluation programs.
 - e) Provide clearly defined job specifications.

VIRGINIA COMMONWEALTH UNIVERSITY AFFIRMATIVE ACTION PROGRAM

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6) Career Counseling

Monitor career counseling to ensure that all employees are given equal opportunity for career counseling:

- a) Counsel employees relative to advancement opportunities open to them and the training programs available to assist them in their career development.
- b) Instruct managers and supervisors to keep the Director of EEO/AA Services informed of all action taken in career counseling.

7) Training

Give all employees equal opportunity to obtain training:

- a) Announce training opportunities,
- b) Develop training programs that enhance advancement potential.
- c) Coordinate training programs for workforce development.

VIRGINIA COMMONWEALTH UNIVERSITY AFFIRMATIVE ACTION PROGRAM

Issued By: *V. Jackson-Williams* Chapter: *V* Subject: **INTERNAL AUDIT &
REPORTING SYSTEM
(41 CFR 60-2.17)**

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An annual audit and reporting system is established to periodically measure the effectiveness of the total Affirmative Action Program by the following actions:

- 1) Monitor records of referrals, placements, transfers, promotions and terminations at all levels on a semi-annual basis to ensure nondiscriminatory policies are carried out.
- 2) Require internal reporting on a scheduled basis as to the degree to which equal employment opportunity and organizational objectives are attained.
- 3) Review report results with all levels of management.
- 4) Advise top management of program effectiveness and submit recommendations to improve performance where required.
- 5) Monitor job applications to ensure compliance with the Immigration Reform and Control Act of 1986 (IRCA) and that the Employment Eligibility Verifications (Form I-9) are properly completed and maintained.

The Director of EEO/AA Services will be responsible for the internal audit system, with the assistance of the supervisors, and will report annually to management the results of these audits.

The university's Affirmative Action Program for the 2002/2003-plan year addressed the two-factor analyses required under 41 CFR 60-2.

The analysis compared the incumbent workforce by job group to the external and internal availability of women and minorities. Each of the two factors was considered. The past practices of the university in recruitment and promotion in filling vacancies were an important aspect of the analyses.

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Chapter: *VI*

Subject: **CORPORATE MANAGEMENT
COMPLIANCE EVALUATIONS
(41 CFR 60-2.30)**

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In compliance with the directives on “Corporate Management Compliance Evaluations” the university has:

- 1) Examined its developmental and selection criteria and practices for artificial barriers to advancement into mid level and senior level positions, i.e., glass ceiling.
- 2) Identified any Equal Employment Opportunity (EEO) problems or potential barriers to EEO, and devised strategies best suited to address those problems within the context of its own particular corporate environment.
- 3) Decided where applicant flows are inadequate, the university will generally publicize, advertise, and search openings for mid level and senior level positions.

The “Corporate Management Review” also has:

- 1) Determined whether there is any unlawful discrimination in selection processes and practices for mid level and senior level management positions, including any discrimination in the employee review procedures or decisions on developmental assignments.
- 2) Evaluated whether minorities, women, individuals with disabilities, and covered veterans already in those positions are treated in a non-discriminatory manner in all aspects of their employment, including, but not limited to, assignments, total compensation, (including benefits and perquisites), and developmental opportunities.

The university supports these concepts and will implement the directives when applicable to the size and structure of its workforce.

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EQUAL OPPORTUNITY POLICYIssue Date: *July 2002*Approval: *Dr. Eugene P. Trani* (41 CFR 60-2.13(a))

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MISSION

Virginia Commonwealth University is a public, urban, research university, supported by Virginia to serve the people of the state and nation. The university provides a fertile and stimulating environment for learning, teaching, research, creative expression, and public service. Essential to the life of the university is the faculty actively engaged in scholarship and creative exploration—activities that increase knowledge and understanding of the world and inspire and enrich teaching.

The university is dedicated to educating full-time and part-time students of all ages and backgrounds in an atmosphere of free inquiry and scholarship so they may realize their full potential as informed, productive citizens with a lifelong commitment to learning and service.

The university serves the local, state, national, and international communities through its scholarly activities, its diverse educational programs, and its public service activities. As an institution of higher learning in a metropolitan center that also is the state capital, the university enjoys unique resources that enrich its programs. The university also contributes its intellectual and creative expertise in the development of innovative approaches to meet the changing needs of our society.

PURPOSE

Virginia Commonwealth University will maintain a strong commitment to outstanding achievement, educational excellence and high principle. Activities of the university are designed to promote the continuing policy of providing equal opportunity for employment and education and access to all programs and services without regard to race, color, religion, national origin, age, gender, political affiliation, veteran's status, sexual orientation, or disability.

POLICY

It shall be the policy of this institution to provide employment opportunities, educational programs, health care services, research activities and other services provided to the public in a manner that will ensure that Virginia Commonwealth University's commitments to nondiscrimination are implemented. Access to all opportunities and services is based on sound principles of nondiscrimination as expressed in the Affirmative Action Plans and Procedures.

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Chapter: *VII*

Subject: **REAFFIRMATION OF VCU'S
EQUAL OPPORTUNITY POLICY
(41 CFR 60-2.13(a))**

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COMMITMENTS

In addition to the commitments to equal opportunity and affirmative action set forth under the Affirmative Action Programs, Virginia Commonwealth University is committed to a policy of nondiscrimination under the following laws and regulations:

- Titles VI and VII of the Civil Rights Act of 1964, as amended
- Executive Order 11246, as amended
- Sections 503 and 504 of the Rehabilitation Act of 1973
- Section 402 of the Vietnam Era Veteran's Readjustment Assistance Act of 1974
- Age Discrimination in Employment Act of 1967, as amended
- Virginia Fair Employment Contracting Act of 1975 (Section 2.1-374 through 2.1-376, Code of Virginia)
- Title IX of the Education Amendment of 1972
- Board of Rights for Virginians with Disabilities (Section 51.5-40, Code of Virginia)
- Americans with Disabilities Act of 1990, Public Law 101-336

RESPONSIBILITY

The plans, policies, procedures, and activities of Virginia Commonwealth University will be monitored through the Office of the Senior Vice President for Finance and Administration for full compliance. Further information may be obtained by contacting Velma Jackson-Williams, Director of EEO/AA Services, 901 West Franklin St., Suite 114, Richmond, VA 23284-3022, Telephone Number: (804) 828-1347.

Dr. Eugene P. Trani, Ph.D.
President