

EXECUTIVE ORDER 11246 AFFIRMATIVE ACTION PLAN (AAP)

for

Texas Cooperative Extension

A Component of the

Texas A&M University System

January 1, 2007 – December 31, 2007

PART I: AAP FOR MINORITIES AND WOMEN

**PART II: AAP FOR COVERED VETERANS
AND PERSONS WITH DISABILITIES**

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This AAP contains confidential information which is subject to the provisions of 18 U.S.C. 1905. Chrysler Corp. v. Brown, 441 U.S. 281, 19 FEP 475 (1979). Copies of this AAP and all related appendices, documents, and support data are made available on loan to the U.S. Government upon the request of said Government on the condition that the Government hold them totally confidential and not release copies to any persons whatsoever. This AAP and its Exhibits and all its supporting documents contain much confidential information which may reveal, directly or indirectly, Texas Cooperative Extension's plans for business or geographical expansion or contraction. Texas Cooperative Extension considers this AAP to be exempt from disclosure, reproduction, and distribution under the Freedom of Information Act upon the grounds, among others, that such material constitutes (1) personnel files, the disclosure of which would constitute a clearly unwarranted invasion of personal privacy, which are exempt from disclosure under 5 U.S.C. 552(b)(6); (2) confidential, commercial, or financial information, which is exempt from disclosure under 5 U.S.C. 552(b)(4); (3) investigatory records compiled for law enforcement purposes, the production of which would constitute an unwarranted invasion of personal privacy, which are exempt from disclosure under 5 U.S.C. 552(b)(7)(C); and (4) matters specifically exempted from disclosure by statute, which are exempt from disclosure under 5 U.S.C. 552(b)(3). Notice is hereby given of a request pursuant to Title 41 Code of Federal Regulations, Part 60-60.4(d) that portions of this AAP be kept confidential.

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

TEXAS COOPERATIVE EXTENSION AAP

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INTRODUCTION TO PARTS I AND II

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

This Affirmative Action Plan is for Texas Cooperative Extension. Separate Plans for other components of the Texas A&M University System have also been prepared.

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

As stipulated in federal regulations, a prerequisite to the development of a satisfactory Affirmative Action Plan is the evaluation of opportunities for the utilization of protected group members, as well as an identification and analysis of problem areas inherent in their employment. Also, where a statistical analysis of the employee workforce reveals a numeric underutilization of minorities or women, greater than would reasonably be expected by their availability, an adequate AAP details specific affirmative action steps to guarantee equal employment opportunity. These steps are keyed to the problems and needs of protected group members. For minorities and women, such steps include the development of hiring and promotion goals and timetables to rectify underutilization where found. It is toward this end that the following AAP of Texas Cooperative Extension was developed.

APPLICABLE AFFIRMATIVE ACTION LAWS AND REGULATIONS

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

Texas Cooperative Extension has developed separately an Affirmative Action Plan for covered veterans and persons with disabilities (Part II) prepared in accordance with the Rehabilitation Act of 1973, Section 503, as amended and Title 41, Code of Federal Regulations, Part 60-741 (Affirmative Action Program for Handicapped Persons), the Vietnam Era Veterans' Readjustment Assistance Act of 1974, Section 4212, as amended, and Title 41 Code of Federal Regulations, Part 60-250 (Affirmative Action Program for Disabled Veterans and Veterans of the Vietnam Era).

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

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

PROTECTED GROUPS

Coverage under affirmative action laws and regulations applies to:

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

Disabled veterans: veterans entitled to compensation for a disability rated at 30 percent or more, or rated at 10 or 20 percent in the case of a veteran who has been determined under

section 3106 of Title 38 to have a serious employment disability, or a person who was discharged or released from active duty because of a service-connected disability.

Vietnam era veterans or other veterans who are "preference eligible": veterans, any part of whose active military service was during the Vietnam era, August 5, 1964 through and May 7, 1975, and who served on active duty for a period of more than 180 days and who were discharged or released therefrom with other than a dishonorable discharge, or who were discharged or released from active duty because of a service-connected disability. Includes veterans who have served in wartime or in a campaign or expedition for which a campaign badge has been authorized.

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

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

PROGRAM TERMINOLOGY

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

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

The grouping of job titles into a given job group does not suggest that Texas Cooperative Extension believes the jobs so grouped are of comparable worth.

Whenever the term "goal" is used, it is expressly intended that it "should not be used to discriminate against any applicant or employee because of race, color, religion, gender, or national origin," as stated in Title 41 Code of Federal Regulations, Part 60-2.30.

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

RELIANCE ON EEOC'S GUIDELINES

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

Reporting Period

This AAP is designed to cover the following reporting period: 01/01/2007 – 12/31/2007.

STATEMENT OF PURPOSE FOR PARTS I AND II

This AAP has been designed to bring women and men, members of minority groups, covered veterans, and persons with disabilities into all levels and segments of Texas Cooperative Extension's workforce in proportion to their representation in the qualified relevant labor market.

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

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

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

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

These three concepts are the Affirmative Action Plan.

TEXAS COOPERATIVE EXTENSION AAP

A Component of the

TEXAS A&M UNIVERSITY SYSTEM

PART I: AFFIRMATIVE ACTION PLAN FOR MINORITIES AND WOMEN

01/01/2007 – 12/31/2007

PART I

AAP FOR MINORITIES AND WOMEN

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PART I: AAP FOR MINORITIES AND WOMEN

CHAPTER 1: WORKFORCE ANALYSIS

41 C.F.R. § 60-2.11

Workforce Analysis

Texas Cooperative Extension conducted a workforce analysis to identify employees at Texas Cooperative Extension by gender and race/ethnicity in each job title. The data was collected from payroll records dated 12/31/2006.

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

For each job title, the salary range or hourly rate is provided, as well as the EEO Category to which the title is assigned. For each job title, Texas Cooperative Extension identified the total number of employees, the number of male and female employees, the total number of minority employees, the male and female minority employees, the total number of White, Black, Hispanic, Asian or Pacific Islander, American Indian or Alaskan Native employees, and the male and female employees within each of these race/ethnic groups.

The workforce analysis is found as **Exhibit 3**.

Texas Cooperative Extension carefully analyzed the workforce analysis to identify problem areas needing correction, such as concentrations or segregation of minorities or women by organizational unit, job, pay, or EEO Category. Problems are identified in Chapter 8: Identification of Problem Areas; programs to correct the identified problems are identified in Chapter 9: Action-Oriented Programs.

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CHAPTER 2: JOB GROUP ANALYSIS

41 C.F.R. § 60-2.12

Although the workforce analysis was conducted individually for every job title, after it was completed, job titles were grouped for the comparison of incumbency to availability and for setting goals. There were several reasons for grouping jobs.

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

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

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

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

Texas Cooperative Extension did not combine job titles with different content, wages, or opportunities if doing so would have obscured problem areas (e.g., job groups which combine jobs in which minorities or women are concentrated with jobs in which they are underrepresented).

CHAPTER 3: PLACEMENT OF INCUMBENTS IN JOB GROUPS
41 C.F.R. § 60-2.13

Each job group appears on a Job Group Report with a job group name and number. The report lists each job title in the job group. For each job title, the worksheet provides the following information: EEO reporting category, job title, employee headcounts for each job title, and overall percentages by gender and race/ethnicity as of 12/31/2006.

See **Exhibit 4** for a copy of the Job Group reports for each job group.

CHAPTER 4: DETERMINING AVAILABILITY

41 C.F.R. § 60-2.14

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

Steps in Comparison of Incumbency to Availability

Identify Availability Factors

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

1. External Factor: The external requisite skills data comes from the 2000 Census of Population.
 - a. Local labor area: See Zip Code Analysis, **Exhibit 6**
 - b. Reasonable labor area: 1) Texas and 2) National
2. Internal Factor: The percentage of minorities or women among those promotable, transferable, and trainable within the contractor's organization.

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

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

See **Exhibit 5** for a copy of the Final Availability reports for each job group.

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

Once final availability estimates were made for each job group, Texas Cooperative Extension compared the percentage of incumbents in each job group to their corresponding availability. A comparison was made between the percentage employed as of 12/31/2006 and that group's final availability.

The identification of under-representation is found in **Exhibit 7**.

CHAPTER 6: PLACEMENT GOALS

41 C.F.R. § 60-2.16

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

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

In establishing goals, Texas Cooperative Extension considered the results which could reasonably be expected from putting forth every good faith effort to make our overall AAP work. We involved personnel-relations staff, department heads, and unit managers and supervisors in the goal-setting process. Goals were not established that would exclude any gender or race/ethnic group.

See **Exhibit 7** for a copy of the Goals report for each job group.

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CHAPTER 7: DESIGNATION OF RESPONSIBILITY

41 C.F.R. § 60-2.17(a)

In order to ensure consistent endeavor and progress toward the goal of equal employment, an Affirmative Action (AA) Officer for both academic and staff employees has been appointed by the Director for academic, executive, administrative, managerial, and classified personnel. It is the responsibility of the AA officer to ensure compliance with the policies set forth by the Director of Texas Cooperative Extension.

1. Affirmative Action Officer

The AA Officer is charged with the overall responsibility for implementation and coordination of The AAP. The Director has pledged full support of his office to the AA officer in his work related to equal employment opportunity. Adequate staff and supportive funds for the AA officer is the direct concern of the Director.

Dan M. Bogart is the AA Officer for Texas Cooperative Extension and is assigned the task of monitoring the implementation of this AAP. However, making sure our organization meets its EEO/AAP obligations is the combined responsibility of all members of administration and supervisory personnel. To administer the responsibilities of this AAP, in an effective manner, the backing by top administration will be given to Dan M. Bogart.

The AA Officer's responsibilities include, but are not limited to:

- a. Developing and implementing an equal employment opportunity and affirmative action policy statement and affirmative action programs.
- b. Auditing employment practices, training programs, hiring and promotion procedures and evaluating the results of Texas Cooperative Extension's AAP and equal opportunity policies and practices.
- c. Assisting administration and faculty in identifying problem areas, in arriving at solutions to problems, and in establishing goals and objectives relative to the equal employment opportunity and affirmative action programs.
- d. Assuring that Texas Cooperative Extension's affirmative action programs and equal opportunity policies meet all regulatory guidelines and serve as liaison between Texas Cooperative Extension and federal enforcement agencies.
- e. Developing policy statements, affirmative action programs, internal and external communication techniques.
- f. Assisting in the identification of problem areas.

- g. Assisting administration in collecting and analyzing employment data, identifying problems, and arriving at solutions to those problems, setting goals, and developing programs to achieve goals.
- h. Designing and implementing internal audit and reporting systems that will:
 - 1) Measure the effectiveness of Texas Cooperative Extension programs and determine where further action is needed.
 - 2) Indicate the need for Texas Cooperative Extension's remedial action.
 - 3) Determine the degree to which Texas Cooperative Extension's goals and objectives have been retained.
- i. Serving as liaison between Texas Cooperative Extension and the government regulatory and enforcement agencies, minority and women's organizations, and other community action groups concerned with employment opportunities of protected group members.
- j. Keeping administration informed of the latest developments in the entire equal opportunity area by reporting at least once each quarter on the progress of AAP goals in addition to a formalized annual EEO/AA report submitted to Texas Cooperative Extension Director.
- k. Ensure the dissemination of current legal information affecting Affirmative Action to the proper levels of administration.

Texas Cooperative Extension believes that a formal AAP must have the commitment of administration, from the head of the smallest work unit to the Director of the Texas Cooperative Extension. All levels of administration are to bear the responsibility of ensuring that the Texas Cooperative Extension's EEO policies and programs as outlined in this AAP are carried out.

1. Manager of Human Resource Services and AA Officer

The Director of Texas Cooperative Extension has delegated to the Manager of Human Resource Services and AA Officer the following responsibilities for implementation of Texas Cooperative Extension's AAP:

- a. Establishing liaison from Texas Cooperative Extension to minority agencies, women's organizations, community action groups, rehabilitation centers, veterans' organizations, and community programs and enforcement agencies.
- b. Keeping management informed of latest developments in the entire equal opportunity arena. This shall be accomplished by sharing related publications, new reports, etc., with management and through meetings that provide for questions and answers related to EEO material.
- c. Determining that all Texas Cooperative Extension facilities are desegregated and periodically inspecting Texas Cooperative Extension bulletin boards to ensure

compliance with federal regulations relative to:

- 1) Display of policy statements including posters; and
 - 2) Posting of job openings to give current employees the opportunity to apply
- d. Undertaking periodic reviews of personnel policies and practices as applied to both academic and staff employees to ensure equal employment opportunities for all applicants and considerations and benefits for all employees and to ensure that minority, female, veteran, and disabled employees are given full opportunities for salary increases, promotions, and transfers.
 - e. Assuring that minority, female, veteran, and disabled employees are afforded a full opportunity and are encouraged to participate in all Texas Cooperative Extension sponsored educational, training, recreational and social activities.
 - f. Seeing that supervisors understand that it is their responsibility to prevent any form of harassment of his or her employees, for any reason, whether race, gender, religion, color, national origin, age, veteran status or because of physical or mental disability.
 - g. Developing informational programs concerning equal employment opportunity for supervisory personnel.
 - h. Developing training programs that will encourage all employees to continue their education and improve their skills and to provide them with information necessary to carry out Texas Cooperative Extension equal employment opportunity policy.
 - i. Providing counseling and advice to women, minority groups, veterans, and disabled employees concerning equal employment opportunity.
 - j. Providing clerical support for the computation of all statistical reports necessary for the achievement of Texas Cooperative Extension Equal Employment Opportunity Policy and AAP.

2. Responsibility of Organizational Units:

Each officer of Texas Cooperative Extension is individually responsible for ensuring that all personnel in areas under the officer's control are thoroughly familiar with the intent and the provisions of the Affirmative Action Program. All Texas Cooperative Extension personnel engaged in any way in supervision are responsible for carrying out the provisions and requirements set forth in the Program and are evaluated for their Affirmative Action Program policies and procedures. Failure to perform such job duties will result in appropriate disciplinary action. In areas of underutilization, the responsible administrative officer will coordinate the efforts of supervisors reporting to the officer in reaching established affirmative action goals.

3. Administration's responsibilities include, but are not limited to the following:

- a. Assisting in the identification of problem areas and the establishment of local and unit goals and objectives.
- b. Being actively involved with local minority organizations, women's organizations, community action groups, and community service programs designed to promote equal employment opportunity.
- c. Participating actively in periodic audits of training programs, and of hiring and promotion patterns, in order to remove barriers to the fulfillment of goals and objectives.
- d. Holding regular discussions with local administrators, supervisors and employees to be certain our organization's policies are being followed.
- e. Reviewing the qualifications of all employees to ensure that minorities and women are given full opportunities for transfers and promotions.
- f. Conducting and/or supporting career counseling for all employees.
- g. Participating in the periodic audit of each location within the facility to ensure compliance in areas such as:
 - 1) The proper display of approved posters;
 - 2) Ensuring that all facilities, including Texas Cooperative Extension housing, which our organization might maintain for the use and benefit of our employees, are in fact desegregated, both in policy and in use. Additional assurance will continue to be made that facilities such as lockers and restrooms are comparable for both sexes;
 - 3) Making sure that minority and female employees are afforded full employment opportunity and are encouraged to participate in all Texas Cooperative Extension sponsored educational, training, recreational and social activities.
- h. Being aware that administration's work performance is being evaluated on the basis of a variety of criteria which includes their equal employment opportunity efforts and results.
- i. Selecting a proper course of action to preclude any harassment of employees who are placed or promoted through affirmative action efforts.

PART I: AAP FOR MINORITIES AND WOMEN

CHAPTER 8: IDENTIFICATION OF PROBLEM AREAS

41 C.F.R. § 60-2.17(b)

Terminology

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

Based on analyses of each job group, areas of concern have been identified and are discussed below. In addition to comparing incumbency to availability within job groups, Texas Cooperative Extension has conducted studies to identify problem areas in each of its selection procedures (i.e., hires, promotions, and terminations) as well as by organizational unit. Texas Cooperative Extension will continue to monitor and update these studies during each AAP year. In each case where potential problem areas have been identified, affirmative actions, as appropriate, will be taken consistent with any of the action-oriented programs described in Chapter 9 of this AAP.

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

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

An analysis of minority and female distribution within each organizational unit was accomplished by a thorough investigation of the Workforce analysis. See **Exhibit 3** for a copy of the Workforce Analysis by organizational unit.

An analysis of minority and female utilization within each job group was accomplished by a thorough investigation of the Comparison of Incumbency to Availability. See **Exhibit 7** for a copy of the Placement Goals report for each job group.

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

Applicant flow, hires, promotions, and terminations were analyzed by job group. An analysis of selection disparities in personnel activity between men/women and whites/minorities was

accomplished by a thorough examination of transaction data. See **Exhibit 8** for a copy of the Personnel Transaction reports for each job group.

Please Note: We chose five as our minimum number of transactions for analysis purposes because it corresponds well with the 80% test (i.e., each person is 20%).

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

Compensation analyses were conducted by comparing the mean salaries for men v. women, and whites v. minorities in each job group. Mean tenure within the organization was also considered as a moderating factor. See **Exhibit 9** for a copy of the Compensation Analyses conducted for each job group.

PART I: AAP FOR MINORITIES AND WOMEN

CHAPTER 9: ACTION-ORIENTED PROGRAMS

41 C.F.R. § 60-2.17(c)

Texas Cooperative Extension has taken, and will continue to take, the following actions in order to implement programs that will be practical and effective in the correction of problems, where necessary, and in the advancement of our EEO objectives. These performance-oriented programs are designed to eliminate discriminatory barriers and achieve goals within the specified timetables. The Affirmative Action Officer is charged with the responsibility of monitoring the following actions. The Affirmative Action Officer will also confirm that our organization is taking and will continue to take the following actions:

Texas Cooperative Extension's Action Oriented Programs:

1. Conduct a detailed review of position descriptions to ensure that they actually reflect position functions and are consistent for the same position from one location to another.
2. Texas Cooperative Extension reevaluates worker specifications throughout the organization. Special attention is given to academic, experience and skill requirements to ensure that the requirements in themselves do not constitute inadvertent discrimination.
3. Job descriptions and position specifications are made available to the appropriate members of administration involved in the recruiting, screening and promotion processes. Copies are available to recruitment sources when necessary.
4. Evaluation of the total selection process is made to ensure freedom from bias and aid in the attainment of AAP goals and objectives. Personnel involved in the recruitment, disciplinary and other related processes are carefully selected and trained to ensure elimination of bias in all personnel actions.
5. Texas Cooperative Extension will continue to observe the OFCCP Uniform Guideline on Employment Selection Procedures especially as they apply to tests. Texas Cooperative Extension is also aware that selection techniques other than tests may also be improperly used so as to have the effects of discrimination against protected group members. Every good faith effort will be made to evaluate such techniques and eliminate them if they are not objectively valid.
6. Texas Cooperative Extension will continue to seek out those individuals qualified to perform our jobs from among minority and female applicants. This activity fosters our commitment to maintain and/or augment the protected group participants in our workforce. Our organization will continue to seek out women and minorities in both the exempt and nonexempt areas of employment and advancement of these protected groups; by conducting formal briefing sessions on Texas Cooperative Extension premises with representatives of protected group employment advocacy groups where possible; and encouraging female and minority

employees to refer applicants, in addition to the increased use of the state employment office.

7. Minority and female employees are given equal opportunity for promotion through such actions as the posting of job openings, and the active encouragement of minorities and females to seek out job advancement. Qualified protected group members are especially encouraged to apply for open position in the employee relations area of our organization.
8. Texas Cooperative Extension will continue to actively encourage all employees to participate in desegregated Texas Cooperative Extension-sponsored social and recreational activities.
9. English as a Second Language (ESL) programs are encouraged for minorities whose primary language is not English. Our organization will assist individuals in finding these ESL programs at local community colleges or with adult education efforts at secondary schools, in order to enhance their employment and promotion possibilities. In addition our organization makes an attempt to provide sign language assistance when applicable.
10. Provision of a well-defined line of career progression is being developed within a number of organizational units, in order to enhance the promotion of females and minorities.
11. Minorities and females are depicted in Texas Cooperative Extension brochures and newsletters in order to promote the participation of protected group members.
12. All training programs are readily available to minorities and females within our organization, in many areas of our organization's workforce. All programs are equitable in availability to both females and minorities.

PART I: AAP FOR MINORITIES AND WOMEN

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

Texas Cooperative Extension has designed and implemented an internal audit and reporting system in order to measure the effectiveness of its total Affirmative Action Program. This system, as detailed below, permits adequate monitoring of progress made toward AAP goal accomplishments and implementation of other Affirmative Action commitments. The system has been established not only to monitor progress but to also keep administration continuously informed.

The Internal Audit and Reporting System:

1. Applicant flow and work force analyses will be conducted annually. Based upon the findings of the annual availability study, a utilization analysis will be prepared for each unit and job group to measure progress toward affirmative action goals.
2. Procedures for Classified Personnel:
 - a. All classified vacancies are required to be listed with the Texas Workforce Commission.
 - b. The Texas Workforce Commission initiates an active search into the job market for qualified applicants to include women and individuals from minority groups, veterans' and handicap organizations in the selection pool.
 - c. No invalidated tests are currently in use or will be used.
 - d. Every application for classified staff sent to the selecting supervisor requires the completion of a Hiring Summary form to ensure that selection has been made on a creditable basis without regard to sex, age, race, or religion, color, national origin, veteran status or any physical or mental handicap. In addition, Human Resources keeps an Applicant Flow Report for control purposes.
3. Procedures for Recruiting faculty and staff:
 - a. NON-ACADEMIC: Supervisors are required to recruit all Professional, Administrative, and Classified vacancies according to established procedures.
 - b. ACADEMIC: The search plan details membership of the ad hoc search committee, recruiting sources to be contacted, and minimum qualifications required. All faculty vacancies will be listed in at least two relevant national professional journals.
4. The Manager of Human Resource Services and AA officer, will prepare an annual

Affirmative Action Program report for the Director. In this report, the Director will analyze the areas discussed below in relation to Affirmative Action goals for each organization unit.

- a. Current Employment: A comparative analysis will be made of each ethnic and gender group to determine the progress toward Affirmative Action Program goals. A summary of this analysis will be prepared to pinpoint where additional effort should be applied.
- b. Applicant Flow: An analysis of the applicant flow for each ethnic and gender group will be made to determine if minorities and females are being properly represented in relation to availability.
- c. Part Time/Temporary: An analysis will be made for each ethnic and gender group to determine if minorities and females are fairly represented in relation to availability.
- d. New Hires: An analysis of new hires will be made of each ethnic and gender group in relation to Affirmative Action Program goals. This analysis will indicate if progress is being made in any areas of underutilization.
- e. Promotions: An analysis will be made for each ethnic and gender group to determine if the rate for each group is in line with its representation in the work force.
- f. Terminations: An analysis of terminations will be made for each ethnic and gender group to determine if the rate of terminations is high or low in relation to representation in the work force.
- g. Hiring Audits Requests for Appointment forms, Acceptance/Rejection forms, and Affirmative Action search summaries will be maintained in such a way that periodic audits may be made by the AA Officer to determine if any bias exists in the selection procedure. The results of these audits will be used to determine if and where corrective actions should be initiated.
- h. Texas Cooperative Extension's record of referrals, placements, transfers, promotions, and separations will continue to be monitored at all levels to ensure our nondiscriminatory policy is carried out. Records of applicants, hires, promotions, and terminations will continue to be maintained by job groups.
- i. Texas Cooperative Extension will continue to give encouragement to minority and female employees to actively participate in community programs for youth motivation.
- j. Texas Cooperative Extension will continue to be an advocate of vocational educational institutions and similar training programs.
- k. Texas Cooperative Extension's progress toward meeting goals will continue to be measured through discussions with organizational unit administrators on a periodic basis. The Affirmative Action Officer is responsible for the evaluation of report results for the proper levels of administration concerning recommendations to improve the Affirmative

Action Program goal accomplishments.

1. An employment action chart is included with this internal audit and reporting system. The chart depicts employment activity by job groups, which allows a clear understanding of actions taken.

TEXAS COOPERATIVE EXTENSION AAP

A Component of the

TEXAS A&M UNIVERSITY SYSTEM

**PART II: AFFIRMATIVE ACTION PLAN FOR DISABLED VETERANS, VETERANS
OF THE VIETNAM ERA, AND PERSONS WITH DISABILITIES**

FOR

January 1, 2007 – December 31, 2007

PART II
AAP FOR DISABLED VETERANS, VETERANS OF
THE VIETNAM ERA, AND PERSONS WITH DISABILITIES

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**PART II: AAP FOR DISABLED VETERANS, VETERANS OF THE
VIETNAM ERA AND PERSONS WITH DISABILITIES**

**CHAPTER A: POLICY STATEMENT
41 C.F.R. §§ 60-250.44(a); 60-741.44(a)**

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

Our obligations in this area stem from not only adherence to all state and federal regulations, but also from our commitment as an employer in this state to provide job opportunities to disabled veterans, veterans of the Vietnam era, and persons with disabilities.

Dr. Edward G. Smith, Director of TCE

PART II: AAP FOR DISABLED VETERANS, VETERANS OF THE VIETNAM ERA AND PERSONS WITH DISABILITIES

CHAPTER B: REVIEW OF PERSONNEL PROCESSES

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

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

- 1) Texas Cooperative Extension periodically conducts a review of its employment processes to assure thorough and systematic consideration of the job qualifications of known covered veteran applicants and employees and applicants and employees with disabilities for job vacancies filled either by external hiring or internal promotions/transfers, as well as for all training opportunities available.

In order to determine whether an individual is qualified for a particular job, a close examination of the content of the job is made, as well as a review of the job qualifications of known disabled veterans, Vietnam era veterans, and individuals with disabilities, both applicants and employees. In determining the qualifications of a covered veteran, consideration is given only to that portion of the military record, including discharge papers, relevant to the job qualifications for which the veteran is being considered. The following steps are in the review process.

- a) Review employment records to determine the availability of promotable and transferable qualified known disabled veterans, veterans of the Vietnam era, and individuals with disabilities presently employed, and to determine whether their present and potential skills are being fully utilized or developed. Note each instance where full utilization or development is not accomplished. Develop a procedure specifically designed to address this underutilization; submit to the AA Officer; implement and report results.
- b) Ensure annotation of the application or personnel form of each known covered veteran or applicant with a disability to identify each vacancy for which the applicant was considered; ensure these forms are quickly and easily retrievable for review and internal auditing activities.
- c) Limit the consideration of a covered veteran's military record to only the portion of that record which is relevant to the specific job qualifications for which the veteran is being considered.
- d) Ensure documentation is provided on personnel or application records of each known covered veteran or employee with a disability to include:
 - i) Promotions for which the employee was considered

- ii) Training programs for which the employee was considered
- e) In each instance where a covered veteran or employee with a disability is rejected for employment, promotion or training, ensure a written statement for the reason for rejection is attached to the application form or personnel file. Ensure the statement includes a comparison of the qualifications of the covered veteran or applicant or employee with a disability with those of the person selected and a description of the accommodations considered where appropriate. Ensure this statement is made available to the applicant or employee upon request.

In those instances where documentation is inadequate, follow-up to obtain sufficient documentation. Identify and implement any corrective action needed to prevent future omissions.

- f) When accommodations were undertaken which made it possible to hire, promote, or train a covered veteran or applicant or employee with a disability, ensure a description of the accommodation is attached to the application form or personnel file.

In any instance where accommodations were not undertaken, but could have been, follow-up to determine why accommodations were not made. Identify and implement any corrective action needed to prevent future omissions.

- 2) Texas Cooperative Extension ensures that its personnel processes do not stereotype disabled persons or Vietnam Era Veterans in a manner which limits their access to jobs for which they are qualified.
- 3) Texas Cooperative Extension will also examine and compare minimum medical requirements for entry to the actual duties and physical demands of each reviewed job classification.
- 4) Texas Cooperative Extension will provide the examining physician with information about the work prospective employees will perform in the reviewed job classifications. Identify each physical requirement from the job analysis. Identify all related working conditions and hazards. Ensure the physician understands Texas Cooperative Extension's desire to eliminate all unnecessary or non-job-related medical requirements.
- 5) Provide the physician with any identified possible accommodations to disabilities.
- 6) Give the medical examination to applicants only after an offer of employment is made. Whenever an inquiry is made into an applicant's or employee's physical or mental condition or a medical examination is conducted for employment or due to a change in employment status, the information obtained is kept confidential, except as otherwise provided for in the regulations.

**PART II: AAP FOR DISABLED VETERANS, VETERANS OF
THE VIETNAM ERA AND PERSONS WITH DISABILITIES**

**CHAPTER C: PHYSICAL AND MENTAL QUALIFICATIONS
41.C.F.R. §§ 60-250.44(c); 60-741.44(c)**

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

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

Schedule for Review: Any previously reviewed classification will be reviewed again if there is a change in working conditions which affects the job's physical or mental requirements (e.g., new requirements, new equipment, etc.)

Listed below are the steps followed in conducting the physical and mental job requirements review for each job classification.

- a) A job analysis is conducted with subject-matter experts (Human Resources department staff, job incumbents, supervisors and/or trainers) using a methodology which addresses the content validity requirements of the Uniform Guidelines on Employee Selection Procedures, the requirements of the Americans with Disabilities Act (ADA), and the EEOC's Technical Assistance Manual for the ADA. The job analysis identifies the essential job duties, tasks, and responsibilities, as well as the knowledge, skills, and abilities, including physical and mental requirements, needed to perform them in an efficient and safe manner. Therefore, the updated job description, resulting from the job analysis, includes only those job requirements which are job-related, consistent with business necessity, and required for safe performance of essential job functions.
- b) Texas Cooperative Extension goes beyond this required step, however, and includes a procedure to minimize any adverse impact resulting from its physical and mental job requirements. Working with the same subject-matter experts and, if appropriate, specialists such as rehabilitation counselors, and also by referencing our adverse impact analyses conducted for the classification being studied, we identify which job qualification requirements, if any, tend to screen out or might tend to screen out qualified disabled veterans or persons with disabilities.
- c) We then modify the selection procedure to reduce the disqualifying impact, and/or we develop a list of accommodations which can be made to the physical

and mental limitations of an employee or applicant. Such accommodations may include providing assistive devices, removing architectural barriers, and/or restructuring work sites and job content. The list of accommodations is considered a starting point only, with the understanding that applicants and employees may bring to our attention additional accommodations which can be made on a case-by-case basis.

- d) Finally, we make the job analysis, the modified selection procedure, and/or the list of identified accommodations available to all members of management involved in the recruitment, screening, selection, and promotion process.

**PART II: AAP FOR DISABLED VETERANS, VETERANS OF
THE VIETNAM ERA AND PERSONS WITH DISABILITIES**

**CHAPTER D: REASONABLE ACCOMMODATION TO PHYSICAL AND MENTAL
LIMITATIONS**

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

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

As part of the University's continuous review of physical and mental job requirements, after any barriers to employment of disabled veterans, veterans of the Vietnam era, and individuals with disabilities are identified, a plan with goals is developed for making any reasonable accommodations to physical and mental limitations of employees and applicants. Such accommodations may include providing assistive devices, removing architectural barriers, and/or restructuring worksites and job content.

This list of possible accommodations which results from the job analyses and from consulting with employees and applicants is made available to all persons involved in the recruitment, screening, selection, and promotion processes.

If a covered veteran or employee with a disability is rejected for employment, promotion, or training, a written statement for the reason is required, part of which includes a description of the accommodations considered. This statement is reviewed by the Affirmative Action Officer and is available to the applicant or employee upon request.

When accommodations are undertaken which made it possible to hire, promote, or train a covered veteran or applicant or employee with a disability, a description of the accommodation is attached to the application form or personnel file.

In any instance where accommodations were not undertaken, but could have been, the Affirmative Action Officer is required to follow-up to determine why accommodations were not made and to identify and implement any corrective action needed to prevent future omissions.

When medical examinations are conducted, Texas Cooperative Extension ensures the physician understands the Extension's desire to eliminate all unnecessary or non job-related medical requirements. The physician is provided with a list of all identified accommodations to in order to assist in making reasonable accommodations where possible.

**PART II: AAP FOR DISABLED VETERANS, VETERANS OF
THE VIETNAM ERA AND PERSONS WITH DISABILITIES**

CHAPTER E: HARASSMENT
41.C.F.R. §§ 60-250.44(e); 60-741.44(e)

Texas Cooperative Extension has developed and implemented a set of procedures to ensure that its employees who are disabled or Vietnam Era Veterans are not harassed due to those conditions.

**PART II: AAP FOR DISABLED VETERANS, VETERANS OF
THE VIETNAM ERA AND PERSONS WITH DISABILITIES**

**CHAPTER F: OUTREACH, POSITIVE RECRUITMENT, AND EXTERNAL POLICY
DISSEMINATION**

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

1. EXTERNAL DISTRIBUTION:

- a. Texas Cooperative Extension will continue to disseminate information externally to assorted community and state organizations, colleges and schools about AA/EEO matters. The major areas of compliance include; recruitment, publications, community relations, correspondence, and contracts.
- b. Texas Cooperative Extension has, and will maintain, liaison with local organizations and institutions that service individuals with disabilities and covered veterans to recruit qualified individuals. All job advertisements published externally state that our organization is an *Equal Opportunity Employer*.
- c. Policy statements regarding individuals with disabilities and covered veterans will continue to be mailed to local organizations and institutions on a yearly basis. Texas Cooperative Extension also features minorities, women, individuals with disabilities, and covered veteran employees in recruiting literature, annual reports, or other publications when employees are involved in such publications.

2. PERSONNEL PROCEDURES

Texas Cooperative Extension exercises a comprehensive commitment to the principles of Affirmative Action and Equal Employment Opportunity. It is our organization's policy not only to comply with all federal, state and local regulations pertaining to Equal Employment Opportunity, but also to develop the true spirit of these acts throughout our organization.

3. GENERAL PROCEDURES

State employment agencies, vocational rehabilitation agencies, school and college placement offices, state education agencies, various community agencies and various advocacy groups will be used as recruiting sources. Documentation of contacts made with these sources will continue to be maintained. Technical assistance on the possible development of on-the-job training opportunities for covered veterans will be made through Veteran Employment Representatives, local Veteran Administration Offices and local Vietnam Era Veterans' organizations.

Consideration is given to only that portion of the covered veteran's military record, including discharge papers, relevant to the specific job qualifications for which the veteran is

being considered. On-site tours and meetings are available as an outreach to interested rehabilitation agencies to familiarize their advisers and job coaches with the physical and mental features of individual job requirements.

We adhere to a schedule for the review of physical and mental job qualification requirements on an on-going basis. This is done to ensure that, to the extent qualification requirements tend to screen out qualified individuals with disabilities and covered veterans, they are job related, consistent with business necessity, and with the safe performance of the job.

Internal audits are conducted to review and evaluate the specific requirement related to the development of Texas Cooperative Extension's Affirmative Action Program and Equal Employment Opportunity. Internal audits are also conducted on the employment and promotion of qualified individuals with disabilities and covered veterans. Periodic internal audits or compliance reviews ensure a better mechanism for the Affirmative Action Program for individuals with disabilities and covered veterans.

Personnel procedures are reviewed annually to determine that present procedures ensure precise and systematic consideration of the essential job function qualifications of known individuals with disabilities, disabled veterans and Vietnam era veteran applicants.

Texas Cooperative Extension does not reduce the amount of employment or promotion compensation offered to individuals with disabilities or covered veterans because of any disability income, pension or other benefit the applicant or employee receives from another source.

All requests to waive advertising for specific job positions are presented to Affirmative Action Officer for evaluation. Exceptions of this nature must have the Director's approval after evaluation. A memorandum from the originator of the waiver request must justify the waiver requirements and must accompany the request.

Employment records are reviewed to determine the availability of qualified promotable and transferable individuals with disabilities and covered veterans.

Any individual with disabilities or covered veteran applicants can request a job accommodation. The request is reviewed by Texas Cooperative Extension administration and an appropriate decision is made. Information obtained from medical examinations is used only to establish work restrictions and to provide safeguards for persons who might require emergency medical treatment. The information is not used to exclude or otherwise limit employment opportunities of qualified individuals.

Information gathered from medical examinations is kept confidential, except that supervisors and administrators may be informed regarding restrictions on work duties of individuals with disabilities, and regarding accommodations. Safety and first aid personnel may also be informed.

Through the Affirmation Action Officer, contacts are made with state and local referral

agencies that serve individuals with disabilities and covered veterans. Agencies such as the Department of Vocational Rehabilitation and others are encouraged to have their clients apply for employment.

Every applicant has the opportunity to identify himself or herself as disabled and/or as a covered veteran. All medical information concerning individuals with disabilities or covered veterans will be used only to meet safety requirements and to make reasonable accommodations for any disability. Information regarding ethnicity, disability, veteran status, and sex is both voluntary and, as to disability and veteran status, confidential.

Texas Cooperative Extension does not reduce the amount of employment or promotion compensation offered to individuals with disabilities or covered veterans because of any disability income, pension or other benefit the applicant or employee receives from another source.

4. Training and Educational Opportunities

Texas Cooperative Extension advocates the pursuit of opportunities for professional and educational development that are advantageous to our organization and to the employee.

Reasonable accommodations are made for employees with disabilities to enable them to take part in job-related training and occupational development.

Texas Cooperative Extension's employees are invited to further their career development by taking part in training and educational assistance programs.

Texas Cooperative Extension's training programs are readily available to qualified individuals with disabilities and covered veterans within our organization in many areas of our organization's workforce. All programs are equally available to both qualified individuals with disabilities and covered veterans.

**PART II: AAP FOR DISABLED VETERANS, VETERANS OF THE VIETNAM ERA
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**CHAPTER G: INTERNAL POLICY DISSEMINATION
41 C.F.R. §§ 60-250.44(g); 60-741.44(g)**

1. INTERNAL DISTRIBUTION

Texas Cooperative Extension's Affirmative Action Policy is available to all employees by the following process:

- a. Annual Memorandum: Each year the Director will send a memorandum reaffirming the AA/EEO Policy Statement to all employees and will continue to include the policy in our organization's policy manual. All publications produced by Texas Cooperative Extension have information for individuals with disabilities. This information is provided so that individuals with disabilities may call our disabilities phone line to make arrangements for access assistance.
- b. Affirmative Action Program: Texas Cooperative Extension's Affirmative Action Program will continue to be revised annually and distributed by the Affirmative Action Officer to all administration offices. The Equal Employment Opportunity Policy and federally required Equal Employment Opportunity posters, affirming our nondiscrimination policy, are posted on bulletin boards in public locations and in work areas.
- c. Administration Training: Texas Cooperative Extension's AA/EEO Policy regarding individuals with disabilities, disabled veterans and veterans of the Vietnam era is communicated in special meetings with supervisory personnel to explain the intent of the policy. It is the Director's official policy that all administrators and supervisors are required to become familiar with their individual responsibility for effective implementation of the contents of the Affirmative Action Plan.

**PART II: AAP FOR DISABLED VETERANS, VETERANS OF THE VIETNAM ERA
AND PERSONS WITH DISABILITIES**

**CHAPTER H: AUDIT AND REPORTING SYSTEM
41 C.F.R. §§ 60-250.44(h); 60-741.44(h)**

Texas Cooperative Extension has developed and currently implements an audit and reporting system that addresses the following:

- 1) Measures the effectiveness of Texas Cooperative Extension's overall Affirmative Action Program and whether the university is in compliance with specific obligations.
- 2) Indicates the need for remedial action.
- 3) Measures the degree to which Texas Cooperative Extension's objectives are being met.
- 4) Whether there are any undue hurdles for individuals with disabilities and Vietnam Era Veterans regarding university sponsored educational, training, recreational, and social activities.

**PART II: AAP FOR DISABLED VETERANS, VETERANS OF THE
VIETNAM ERA AND PERSONS WITH DISABILITIES**

**CHAPTER I: RESPONSIBILITY FOR IMPLEMENTATION
41 C.F.R. §§ 60-250.44(i); 60-741.44(i)**

The Director's Office is responsible for the administration of the Affirmative Action Plan and Equal Employment Opportunity policies. Our organization's written commitment to the principles of affirmative action and equal employment is distributed annually to all employees. It is clearly stated that achievement of the AAP/EEO policy is an administrative responsibility. This responsibility especially applies to administrators, supervisors, the Affirmative Action Officer, and others designated as Affirmative Action Representatives.

Texas Cooperative Extension will fulfill the Affirmative Action Plan for the disabled, special disabled veterans, and Vietnam era veterans by the following actions:

1. Consider qualified individuals with disabilities and covered veterans without discrimination in the regulation of its personnel process.
2. Post notices of Texas Cooperative Extension's EEO/AA obligations in conspicuous places in order to publicize the Affirmative Action Plans for individuals with disabilities and for covered veterans. The notices will continue to be available to both employees and applicants for employment.
3. Invite all applicants and employees to self-identify as persons with disabilities or covered veterans so our organization can take affirmative action to employ and advance in employment qualified individuals with disabilities and covered veterans.
4. Inform employees of Texas Cooperative Extension's policy concerning the employment of persons with disabilities and covered veterans.
5. Provide information to all employees regarding modifications in Texas Cooperative Extension's policies and procedures.
6. List all suitable employment openings with the appropriate local office of the TWC.
7. Provide training and counseling to all employees, supervisors and administrators in order to gain positive support and understanding of the Affirmative Action Program for individuals with disabilities and for covered veterans.
8. Work closely with local organizations, advocacy groups and institutions servicing individuals with disabilities and covered veterans.
9. Achieve reasonable accommodations by removal of architectural and psychological barriers, modification of the work place, and/or job duties, providing job aids, etc.

10. Include individuals with disabilities and covered veterans when the Texas Cooperative Extension employees are identified in advertisements for jobs.
11. Inclusion of EEO/AA clauses will continue in contracts awarded under government prime contracts and subcontracts. Clauses state that the contractor is bound by the terms of Section 503 of the Rehabilitation Act of 1973, as amended, 38 USC 4212 (formerly 2012) of the Vietnam Era Veterans Readjustment Assistance Act of 1974, and is committed to affirmative action and equal employment opportunity.

Texas Cooperative Extension has appointed the Affirmative Action Officer responsible for the Disabled, Disabled Veterans, and Vietnam Era Veterans Programs. The Affirmative Action Officer has been given the necessary top administrative support and staff to implement these programs, including the following activities:

1. Design and implement auditing and reporting systems that will measure the effectiveness of our organization's programs and indicate the need for remedial action when necessary.
2. Determine the degree to which our organization objectives have been attained, and determine whether known individuals with disabilities and covered veterans have had the opportunity to participate in all Texas Cooperative Extension sponsored educational training, recreational, and social activities.
3. Collect and process all requests for assistance in accommodating the physical, emotional, and mental disabilities of an employee and assist individuals with disabilities and covered veterans with job development.
4. Comply with Affirmation Action obligations in the employment and placement of qualified individuals with disabilities and covered veterans by developing and maintaining a list of contacts with interested referral agencies, in addition to developing and implementing programs for the recruiting and placement of qualified individuals with disabilities and covered veterans.
5. Reviewing potential personnel files of applicants who are disabled and covered veterans, and maintain a profile on each individual concerning work skills, education and training.
6. Support Texas Cooperative Extension authorities in drawing up specifications for modification of existing physical structures, as needed, for accessibility by individuals with disabilities.
7. Train Texas Cooperative Extension supervisors and administrators concerning the responsibilities of a Federal contractor under Section 503 of the Rehabilitation Act of 1973 and 38 USC (formerly 2012) of the Vietnam Era Veterans Readjustment Assistance Act of 1974, and serve as a resource to supervisors, employees and applicants in all matters concerning individuals with disabilities and covered veterans.
8. Reviewing existing regulations to keep informed of all new or updated regulations to

ensure that our organization is in compliance with federal and state laws.

9. Publicize the Disabled, Disabled Veterans, and Vietnam Era Veterans Programs internally and externally throughout our organization.

**PART II: AAP FOR DISABLED VETERANS, VETERANS OF THE VIETNAM ERA
AND PERSONS WITH DISABILITIES**

**CHAPTER J: TRAINING
41 C.F.R. §§ 60-250.44(j); 60-741.44(j)**

Texas Cooperative Extension trains all employees involved in any way with the recruitment, selection, promotion, disciplinary actions, training, and related processes of individuals with disabilities or Vietnam Era Veterans to ensure commitment to the university's stated Affirmative Action goals.

**PART II: AAP FOR DISABLED VETERANS, VETERANS OF THE VIETNAM ERA
AND PERSONS WITH DISABILITIES**

**CHAPTER K: COMPENSATION
41 C.F.R. §§ 60-250.21(i); 60-741.21(i)**

It is the policy of Texas Cooperative Extension that when offering employment or promotion to disabled veterans, veterans of the Vietnam era, or individuals with disabilities, the amount of compensation offered will not be reduced because of any disability income, pension, or other benefit the applicant or employee receives from another source.