AFFIRMATIVE ACTION PROGRAM
FOR
PROTECTED VETERANS

Seattle - Main Campus
Seattle, WA

November 1, 2018 through October 31, 2019
### Table of Contents

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Preface</td>
<td>3</td>
</tr>
<tr>
<td>Equal Employment Opportunity and Affirmative Action Statement of Policy</td>
<td>4</td>
</tr>
<tr>
<td>Definitions</td>
<td>5</td>
</tr>
<tr>
<td>Responsibility for Implementation</td>
<td>6</td>
</tr>
<tr>
<td>Request for Self-Identification</td>
<td>8</td>
</tr>
<tr>
<td>Review of Personnel Policies</td>
<td>9</td>
</tr>
<tr>
<td>Review of Physical and Mental Job Requirements</td>
<td>10</td>
</tr>
<tr>
<td>Reasonable Accommodations</td>
<td>11</td>
</tr>
<tr>
<td>Compensation</td>
<td>14</td>
</tr>
<tr>
<td>Internal Communication Procedure</td>
<td>15</td>
</tr>
<tr>
<td>Harassment</td>
<td>16</td>
</tr>
<tr>
<td>Training</td>
<td>17</td>
</tr>
<tr>
<td>Internal Dissemination of Policy</td>
<td>18</td>
</tr>
<tr>
<td>Outreach, Positive Recruitment and External Dissemination of Policy</td>
<td>20</td>
</tr>
<tr>
<td>Data Collection Analysis</td>
<td>22</td>
</tr>
<tr>
<td>Hiring Benchmarks</td>
<td>23</td>
</tr>
<tr>
<td>Monitoring and Reporting Systems</td>
<td>24</td>
</tr>
<tr>
<td>List of Exhibits</td>
<td>26</td>
</tr>
</tbody>
</table>
Preface

Seattle - Main Campus (also referred to as the University) is committed to the concept and practice of equal opportunity and affirmative action. In the preparation of this affirmative action program (AAP), we have been guided by the Vietnam Era Veterans’ Readjustment Assistance Act of 1974, as amended by the Jobs for Veterans Act of 2002 (38 U.S.C. § 4212), and its implementing OFCCP regulations (41 C.F.R. Part 60-300). Nothing contained in this AAP or its supporting data should be construed as an admission by the University, in whole or in part, that it has contravened any federal, state, or local employment practice laws.

In developing and implementing this AAP, Seattle - Main Campus has been guided by its established policy of providing equal employment opportunity. Nothing herein is intended to sanction the discriminatory treatment of any person. Thus, this AAP has been developed in strict reliance upon the Guidelines on Affirmative Action issued by the Equal Employment Opportunity Commission (EEOC) (29 C.F.R. Part 1608).

While the University firmly believes in dissemination of its affirmative action policies and equal employment opportunity practices and makes the non-data components of this AAP available for review to employees and applicants upon request, the AAP remains a University proprietary document. Moreover, the data on which the University has relied in preparing this AAP are confidential and sensitive, and the University believes release of the data would subject the University to commercial harm. Therefore, the following is requested:

- If this AAP or any supporting data or documentation are submitted to Office of Federal Contract Compliance Programs (OFCCP) pursuant to the Executive Order, the Rehabilitation Act, The Vietnam Era Veterans’ Readjustment Assistance Act and/or any implementing regulations (as any or all have been or may be amended), those documents and the information they contain are to be considered confidential and not subject to disclosure without notifying the University of the agency's decision to disclose and providing the University with ample time to contest the disclosure. Advance notice of disclosure should be sent to Shelley Kostrinsky, Equal Opportunity and Affirmative Action Officer. The University requests this information be treated as exempt from public disclosure under the Freedom of Information Act, 5 U.S.C. § 552.

- If this AAP or any supporting data or documentation is supplied by University to another government contractor, EEOC or fair employment practices agency representatives, or any other person, it is not to be copied, reproduced, or disclosed by such persons without prior notification to the University.

- No information contained in the AAP or any supporting data or documentation is to be copied, removed from the premises, or released to other individuals without a prior notification to and permission from the University.

- Reports that require specific data, such as names of employees and salary information, are not an official part of this AAP. This information is on file at the University as Documentation and Supporting Data for AAP Reports and is available for review only as required by law.

This AAP does not constitute an express or implied contract between the University and its employees, job applicants, or other persons, nor does it change in any way the basic at will employment relationship all University employees have with the University. Nothing in this AAP creates a private right of action on behalf of any individual or group against the University.
Equal Employment Opportunity and Affirmative Action Statement of Policy
41 C.F.R. 60-300.44(a)

The University of Washington reaffirms its policy of equal opportunity regardless of race, color, creed, religion, national origin, sex, sexual orientation, age, marital status, disability, or status as a protected veteran. This policy applies to all programs and facilities, including, but not limited to, admissions, educational programs, employment, and patient and hospital services. Any discriminatory action can be a cause for disciplinary action.

Discrimination is prohibited by:

- Presidential Executive Order 11246 as amended,
- Washington State Gubernatorial Executive Orders 89-01 and 93-07,
- Title VI and Title VII of the Civil Rights Act of 1964,
- Washington State Law Against Discrimination RCW 49.60,
- Title IX of the Education Amendments of 1972,
- State of Washington Gender Equity in Higher Education Act of 1989,
- Sections 503 and 504 of the Rehabilitation Act of 1973,
- Americans with Disabilities Act of 1990,
- Age Discrimination in Employment Act of 1967 as amended,
- Age Discrimination Act of 1975,
- Vietnam Era Veterans’ Readjustment Assistance Act of 1972 as amended,
- as well as other federal and state statutes, regulations, and University policy.

Equal Opportunity and Affirmative Action compliance efforts at the University of Washington are coordinated by the Office of Equal Opportunity and Affirmative Action, you may contact us for more information.

____________________________________
Mark Richards
Provost and Executive Vice President
“DISABLED VETERAN” is (1) A veteran of the U.S. military, ground, naval, or air service who is entitled to compensation (or who but for the receipt of military retired pay would be entitled to compensation) under laws administered by the Secretary of Veterans Affairs, or (2) A person who was discharged or released from active duty because of a service connected disability.

“QUALIFIED DISABLED VETERAN” means a disabled veteran as defined above who has the ability to perform the essential functions of the employment position at issue with or without reasonable accommodation.

“RECENTLY SEPARATED VETERAN” means any veteran during the three-year period beginning on the date of such veteran's discharge or release from active duty in the U.S. military, ground, naval or air service.

“ARMED FORCES SERVICE MEDAL VETERAN” is any veteran who, while serving on active duty in the U.S. military, ground, naval or air service, participated in a United States military operation for which an Armed Forces service medal was awarded pursuant to Executive Order 12985.

“ACTIVE DUTY WARTIME OR CAMPAIGN BADGE VETERAN” means a veteran who served on active duty in the U.S. military, ground, naval or air service during a war or in a campaign or expedition for which a campaign badge has been authorized, under the laws administered by the Department of Defense.

“PROTECTED VETERANS” means Disabled Veterans, Recently Separated Veterans, Armed Forces Service Medal Veterans, and Active Duty Wartime or Campaign Badge Veterans.
Responsibility for Implementation
41 C.F.R. 60-300.44(i)

Mark Richards, Provost and Executive Vice President, has overall responsibility for implementation of the Equal Employment Opportunity Policy and the AAP. The University has assigned primary management responsibility and accountability for ensuring full compliance with the Program to Shelley Kostrinsky, Equal Opportunity and Affirmative Action Officer. The Affirmative Action Officer, Shelley Kostrinsky, Equal Opportunity and Affirmative Action Officer, has the authority, resources, support of and access to top management necessary to ensure the effective implementation of the AAP. The Provost and Executive Vice President actively supports the program and provides assistance whenever it is needed, making managers and supervisors aware of the program and requesting their cooperation and assistance. The identity of the Affirmative Action Officer appears on internal and external communications regarding the University's Equal Employment Opportunity Policy and AAP.

With regard to the University AAP, Mark Richards works closely with Shelley Kostrinsky, Equal Opportunity and Affirmative Action Officer to implement the programs which are specific to the University. Shelley Kostrinsky, Equal Opportunity and Affirmative Action Officer, together with the Office of the Vice Provost for Academic Personnel, has primary responsibility for implementing programs at the University.

The duties of the Affirmative Action Officer and designees include:

- Developing policy statements, AAPs, and internal and external modes of communication
- Overseeing regular discussions with local managers, supervisors, and employees to ensure the University's policies are being followed
- Training personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes to ensure the commitments in the University's affirmative action program are implemented
- Advising supervisors their affirmative action efforts and results are a component of their performance evaluations, and the University is obligated to prevent discrimination and harassment of employees
- Identifying, in conjunction with line management any problem areas in implementing the AAP, and developing solutions
- Identifying any barriers to employment for protected veterans, including those with known disabilities, and assisting managers in developing reasonable accommodations to ensure that individuals with disabilities benefit from equal employment opportunities
- Designing and implementing an internal audit and reporting system that will measure the effectiveness of the University's Program, indicate the need for remedial action, determine the degree to which the University's objectives have been attained, determine whether employees who are protected veterans have had the opportunity to participate in University-sponsored educational, training, recreational, and social activities, and ensure each University location is in compliance with applicable laws and regulations
- Serving as liaison between the University and enforcement agencies, and between the University and organizations of and for protected veterans
• Encouraging active involvement by University representatives in the community service programs of local organizations of and for protected veterans

• Ensuring posters and notices are properly displayed or disseminated in ways that are accessible and understandable to applicants and employees and

• Keeping management informed of the latest developments in affirmative action.

The responsibilities of managers and supervisors under this AAP include:

• Taking action to prevent the discrimination and harassment of employees

• Ensuring their departments fully comply with the spirit and letter of the affirmative action program and policies

• Reviewing the qualifications of all applicants and employees to make sure qualified individuals are treated in a nondiscriminatory manner with regard to hire, promotion, transfer, and termination

• Reviewing the job performance of each employee to assess whether personnel actions are justified based on the employee's performance of his or her job duties and responsibilities and

• Working with the Affirmative Action Officer or appropriate Human Resources Administrator and qualified veteran employees or applicants with known disabilities to determine appropriate reasonable accommodations if they are necessary for performance of the job and/or recruitment process.
Request for Self-Identification
41 C.F.R. 60-300.42

In order to notify applicants and employees of the existence of and the opportunity to participate in this affirmative action program and to provide sufficient data to allow Seattle - Main Campus to measure and improve, if necessary, the effectiveness of the University's affirmative action efforts, Seattle - Main Campus invites applicants and employees to complete an invitation to self-identify status as a protected veteran as follows:

• When an applicant applies or is considered for employment, the University provides the applicant with a copy of the form attached as Exhibit A, at the same time the University invites the applicant to self-identify race, ethnicity, sex, and disability status.

• Following an offer of employment but before the individual begins his/her job duties, the University provides an additional copy of the form attached as Exhibit A.

The University keeps all self-identification information confidential and maintains it in a data analysis file rather than in individual employee personnel or medical files.
Review of Personnel Policies  
41 C.F.R. 60-300.44(b)

Seattle - Main Campus periodically reviews its personnel procedures to determine whether they ensure the careful, thorough, and systematic consideration of the job qualifications of employees or job applicants who are protected veterans for jobs filled either through vacancy or promotion and for educational or training opportunities. The University ensures that its personnel processes facilitate the implementation of the Affirmative Action Program.

Vacancies are advertised, and applications are accepted from any interested person. Seattle - Main Campus's employment application, the Careers section of its website, and all advertisements include a link to the non-discrimination statement to further assure applicants of the University's policy of equal employment opportunity. An EEO statement will be included in other recruitment literature should the University use such documents in the future. All non-executive positions lasting three days or more not expected to fill from within will be referred to the appropriate state employment service delivery system. In addition, to ensure protected veterans are aware of our openings, the University will send vacancy announcements to the sources listed in the Outreach, Positive Recruitment, and External Dissemination of Policy section of this Affirmative Action Program.

The University ensures its personnel processes do not limit, segregate, or classify an employee or job applicant in a way that adversely affects employment opportunities or status on the basis of status as a protected veteran. The University makes sure when a protected veteran is considered for an employment opportunity, the University relies only on that portion of the individual's military record, including his or her discharge papers, relevant to the requirements of the opportunity at issue. The University periodically reviews any physical and mental job qualifications to ensure they do not tend to screen out disabled veterans for reasons that are not job related or consistent with business necessity, or do not relate to ensuring the safe performance of the essential functions of the job. The University makes any necessary modifications to ensure applicants and employees receive equal opportunity in the operation of all personnel processes, and protected veterans are not stereotyped in a manner that limits their access to jobs for which they are qualified.

The University ensures applicants and employees who are protected veterans and who meet job qualifications have equal access to its personnel process, including those implemented through information and communication technologies, and provides necessary reasonable accommodation to make sure applicants and employees who are disabled veterans receive equal opportunity in the operation of all personnel processes.
Seattle - Main Campus reviews physical and mental job qualification requirements as job qualification requirements are established or revised to ensure qualification requirements do not screen out qualified individuals with disabilities or qualified disabled veterans for reasons that are not job related or consistent with business necessity and the safe performance of the essential functions of the job. This review occurs at regular intervals throughout each calendar year, such as when a job may be advertised or filled through hiring or promotion, when the duties of a position are significantly revised, and when considering requests for reasonable accommodation related to the performance of the functions of the position.

Seattle - Main Campus also regularly reviews its personnel processes to ensure any medical exams or inquiries are conducted in accordance with the Section 503 regulations. Information regarding the medical condition or history of an individual obtained as a result of any such inquiry or exam is collected and maintained on separate forms and in separate medical files and treated as a confidential medical record.

To the extent any physical or mental job qualification measurements are found to potentially screen out qualified individuals with disabilities or qualified disabled veterans in the selection of employees or applicants for employment or in other changes in employment status such as promotion or training, Seattle - Main Campus will ensure the requirements are related to the specific job(s) for which the individual is being considered and are consistent with business necessity and the safe performance of the job.

To date, no qualification requirements have been identified that are likely to have a screening effect. All job qualification requirements have been found to be job related, consistent with business necessity, or required for the safe performance of the job.
Reasonable Accommodations
41 C.F.R. 60-300.44(d)

The University’s disability accommodation process is intended to be interactive and collaborative, relying on open communication and active participation between you and the University. The primary goal of this process is to help you to perform all of the essential functions of your current position, with or without accommodation.

Requesting accommodation

To request an accommodation, submit a completed Accommodation Request for Disability or Serious Medical Condition (PDF) form or otherwise inform your supervisor of your need for accommodation. If you prefer not to make your accommodation request to your supervisor, you can instead contact your HR consultant or the Disability Services Office.

Additionally, you may be asked to provide a Disability Accommodation Health Care Provider Statement (PDF) to help the University understand your condition, capacities, or limitations. This medical statement should be sent directly to your HR consultant or the Disability Services Office, not to your supervisor.

While use of the two UW forms is not required, these forms are designed to obtain sufficient information for the University to respond effectively to your request for accommodation. Not using the forms or providing incomplete information may delay the accommodation process due to the additional time needed to clarify your needs and related medical information.

If at any point you need assistance with either form, contact the Disability Services Office.

Accommodation process

The University will respond to your accommodation request as quickly as possible. Response time may be affected by the complexity of the accommodation requested.

For minor workstation adjustments (such as desk height modifications or ergonomic enhancements), your supervisor may be able to implement requests without additional assistance beyond the department.

Requests requiring job duty modifications, environmental changes, equipment purchases, or other significant actions may necessitate the help of Human Resources, the Disability Services Office, or Risk Management (for job-related illnesses or injury).

Job analysis

The Disability Services Office may conduct a job analysis of your position. If an accommodation request is related to an on-the-job illness or injury, Risk Management may conduct the job analysis.

A job analysis assesses the position’s physical and cognitive requirements and identifies essential job functions. Essential functions are the fundamental job duties or requirements of a position that you must be able to perform, with or without accommodation. They cannot be removed from the position without changing its nature. Duties that are not essential may be modified, eliminated, replaced, or restructured as part of the accommodation process.

You may be asked to take the completed job analysis to your health-care provider to help your provider effectively assess whether you can perform your position’s essential job functions. If
the University determines that an independent medical assessment is necessary, the University will pay for the examination.

**Leave of absence**

If you are unable to perform the essential functions of your job due to a medical condition, even with a workplace modification, the appropriate accommodation may be a leave of absence from work. A leave of absence may also be necessary while the University evaluates an accommodation request.

Visit disability leave for additional information about leave as an accommodation.

**Alternative job search**

If the University determines that it is not possible to accommodate you in your current position, and you can work at least half time or more, the University will attempt to place you in an open UW position under the following conditions:

- The position has a comparable or lower salary range or grade as your current position.
- You meet the position’s minimum qualification and special skill requirements.
- You are able to perform the position’s essential functions, with or without accommodation.

**Medical separation**

If your current position cannot be accommodated to your needs and an alternative position is not possible, your University employment will end. However, you are eligible for reemployment assistance for up to two years after your separation. Assistance may include such services as:

- Assessment of resume and qualifications
- Development of job search strategies
- Assistance with the UW application process

Former employees who are able to work at least half time and are interested in reemployment assistance should contact the Disability Services Office.

**Confidentiality**

By law, your medical information must be kept confidentially and separately from your employee personnel file. For employees with academic appointments, medical records are maintained by the Disability Services Office. UW Human Resources maintains medical files for all other types of employees.

Risk Management may also have medical records if the medical condition is work-related.

**Complaint resolution process**

If you are not satisfied with the University’s response to your accommodation request, speak with your HR consultant or visit complaint resolution for guidance on the next steps available to you.

**Supervisor responsibilities**

**Receiving a request**
Contact your HR consultant or the Disability Services Office if:

- You have any questions about the accommodation being requested (such as regarding duration, scope, necessity, workplace impact, or the employee’s ability to perform the position’s essential functions even with accommodation)
- An employee tells you about a health problem that could impact their ability to perform their job but does not make a specific accommodation request

All responses to requests for accommodation must be documented, even if they are simple or temporary job or workspace modifications. Your HR consultant or the Disability Services Office can help you respond appropriately and document the accommodation process.

And though not all accommodations are approved, an accommodation request — and its possible alternatives — must be thoroughly evaluated prior to denial. Always speak with your HR consultant or the Disability Services Office prior to denying an accommodation request.

**Medical information**

If you receive documents containing medical information, immediately forward them on to your HR consultant or the Disability Services Office (whichever you are working with regarding this request). Do not keep medical records in departmental files.

You should not ask the employee for personal medical information or about the disability itself, your focus should be on the workplace modification being requested. The employee is not required to disclose medical information to their supervisor. However, if an employee does choose to disclose such information, advise them that you will keep the information confidential, and redirect them to the appropriate resource if they have questions about accommodation procedures or policies.
Compensation
41 C.F.R. 60-300.21(i)

In offering employment or promotions, Seattle - Main Campus does not reduce the amount of compensation offered to protected veterans because of any disability income, pension, or other benefit the employee receives from another source. Similarly, the University does not reduce the amount of compensation offered to an employee or applicant because of the actual or anticipated cost of a reasonable accommodation needed, requested, or anticipated.
Internal Communication Procedure

The University has developed an internal communication procedure whereby all employees, including protected veterans, can raise any issues or claims that may arise during the course of their employment. General communications procedures encourage any and all employees, including protected veterans, to discuss such issues or claims. All matters brought to the attention of the Affirmative Action Officer will be confidentially addressed.
Seattle - Main Campus has developed and implemented policies and procedures to ensure employees who are protected veterans are not harassed because of their veteran status.

A copy of the University's Equal Employment Opportunity and Affirmative Action Policy Statement forbidding harassment against individuals based on protected characteristics is included in this AAP.
Training
41 C.F.R. 60-300.44(j)

The University trains personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes to ensure the commitments in the University's AAP are implemented.
The University recognizes that, however strong its outreach program, internal support from supervisory management and other employees is necessary to ensure maximum effectiveness of its AAP for protected veterans. So that these employees’ awareness of the needs of protected veterans can be increased and employee participation in the program is increased, the University will utilize the following procedures to maximize the internal implementation and dissemination of its Equal Employment Opportunity and Affirmative Action Policy:

- The University includes a copy of the policy statement in its Policy Manual.
- Seattle - Main Campus’s policy on equal employment opportunity and affirmative action for protected veterans is posted on University bulletin boards. The posting includes a statement that employees and applicants are protected from coercion, intimidation, and interference or discrimination for filing a complaint or assisting in an investigation under the Vietnam Era Veterans Readjustment Assistance Act of 1974, as amended.
- The University posts a copy of the policy in electronic format in a conspicuous location on the University intranet, along with other employment forms, and otherwise ensures all off-site personnel have a copy of or the ability to view the policy.
- The University’s electronic applicant process includes information about the University’s commitment to equal employment opportunity and affirmative action.
- The University will communicate to employees its obligation to take affirmative action to employ qualified protected veterans and will encourage employee referral of covered applicants.
- Seattle - Main Campus will invite employees who are protected veterans to participate in the AAP.
- Meetings with executive management and supervisory personnel will be conducted at least annually to explain the University’s policy of affirmative action, to make clear the President’s support for the policy, and to impart to these personnel their responsibility in making the AAP a success.
- An invitation to participate in Seattle - Main Campus's policy of affirmative action is disseminated to all applicants, as well as to all employees once the University has extended a job offer, but before beginning employment duties.
- When applicable, Seattle - Main Campus publicizes the policy in University publications.
- The policy is discussed in both new employee orientation and management training programs.
- When applicable, University publications include articles on accomplishments of all employees, including protected veterans.

If the University has or becomes party to collective bargaining agreements, union officials will be informed the University is bound by the terms of the Vietnam Era Veterans’ Readjustment Assistance Act of 1974, as amended, and is committed to take affirmative action to employ and advance in employment protected veterans, and the University will not discriminate against protected veterans. For those sites not subject to a collective bargaining agreement,
no notification of union officials is necessary.
Seattle - Main Campus has reviewed its employment practices to determine whether its personnel programs are designed to effectively recruit and advance in employment protected veterans. While the University believes there are no deficiencies in its current employment practices with respect to applicants and employees who are protected veterans, it engages in outreach, positive recruitment, and external dissemination programs to augment its existing affirmative efforts. For example, the University sends written notification of its affirmative action policy to all subcontractors, including subcontracting vendors and suppliers, and requests appropriate action on their part. In addition, the University engages in or has made plans to implement the following activities:

- Seattle - Main Campus makes the Equal Employment Opportunity Clause part of all covered contracts and purchase orders.
- The University posts all job vacancies (other than some executive and senior management positions or positions lasting three days or less) for which it considers outside applicants with the state workforce agency job bank or local employment delivery system where the opening occurs. These postings occur before or concurrently with the use of other recruitment efforts to fill the job and are provided in the manner and format specified by the relevant agency that will allow the agency to provide priority referral of protected veterans.
- Seattle - Main Campus has notified the employment service delivery system in each state where it has establishments that it is a federal contractor and it desires priority referrals of protected veterans for job openings in that state. The University also provided the employment service delivery system with the name and location of all hiring locations within the state and the contact information for an employee who can answer questions about such job listings. The notice also included the names and contact information for job search organizations the University uses to assist in hiring, if any. If any of the information in this disclosure changes, the University sends an update with the next relevant job listing.
- Executives, management officials, supervisors, and other employees of the University are encouraged to assist in the effort to disseminate Seattle - Main Campus's policy of affirmative action to appropriate individuals outside of the University.
- The University will inform recruiting sources of Seattle - Main Campus's policy of affirmative action for protected veterans. Recruiting sources will be requested to actively recruit and refer qualified protected veterans for all positions.
- Seattle - Main Campus will identify local organizations and/or community agencies known to specialize placing and/or developing training programs for protected veterans and send them notices of vacant positions. Examples of these outreach efforts include contacting the following:
  - Veterans' Employment Representative in the employment service center near the facilities covered in this AAP
  - Department of Veterans Affairs Regional office near the facilities covered in this AAP
  - Veterans' coordinators on campuses where the University normally recruits
- Other recruitment sources that specialize in placement of protected veterans

- When appropriate, the University will invite community service and other outreach partners to tour the office and discuss the University, job recruitment needs, selection process, and other details related to recruitment and placement. In the event a partner is unable to schedule an on-site meeting, the University will suggest a telephone meeting so they can better identify qualified individuals for our positions.

- When the University recruits at colleges and universities, it will incorporate efforts to reach students who are protected veterans.

- Seattle - Main Campus will seek to include protected veterans when employees are pictured in consumer and personnel recruitment advertising.

- Seattle - Main Campus makes reasonable accommodations for qualified veterans with disabilities.

- Seattle - Main Campus advertisements or solicitations for prospective employees indicate that the University is an equal opportunity employer.

- As described in more detail in Exhibit C, Seattle - Main Campus evaluates the effectiveness of its outreach and recruitment efforts to determine if its affirmative action objectives are being met, and makes appropriate changes.
Seattle - Main Campus documents computations or comparisons pertaining to applicants and hires on an annual basis and maintains the documentation for a period of three years.
Hiring Benchmarks  
41 C.F.R. 60-300.45

In establishing a hiring benchmark, the following principles apply:

- The purpose of establishing a hiring benchmark is to provide the University with a quantifiable method by which it can measure its progress toward achieving equal employment opportunity for protected veterans.

- The hiring benchmark is not a quota that must be met, nor is it a ceiling that limits or restricts the employment of protected veterans.

- In all employment decisions, the University makes selections in a nondiscriminatory manner. Hiring benchmarks do not provide a justification to extend a preference to any individual, select an individual, or adversely affect an individual's employment status, on the basis of that individual's veteran status.

- Hiring benchmarks do not create set-asides for specific groups, nor are they intended to achieve proportional representation or equal results.

- Hiring benchmarks are not used to supersede merit selection principles, nor do they require the University to hire a person who lacks qualifications to perform the job successfully or hire a less qualified person in preference to a more qualified one.

- A finding that the hiring benchmark has not been attained does not constitute either a finding or admission of discrimination.

Seattle - Main Campus has established its benchmark in accordance with the national percentage of veterans in the civilian labor force as published on the OFCCP website. As of November 01, 2018, this benchmark percentage is 6.4 percent.
Monitoring and Reporting Systems
41 C.F.R. 60-300.44(h)

It is the responsibility of the University's Affirmative Action Officer to monitor employment and personnel practices to ensure compliance with applicable regulations and adherence to the University's Statement of Policy, to report specific problems to the appropriate management personnel, and to measure the effectiveness of Seattle - Main Campus's AAP.

The University's audit and reporting system is designed and implemented to:

- Measure the effectiveness of the AAP
- Identify any need for remedial action
- Determine the degree to which the University's objectives are being attained
- Determine whether individuals who are known protected veterans have had the full opportunity to participate in all University sponsored educational, training, recreational and social activities
- Measure the University's compliance with the AAP's specific obligations, and
- Document the actions taken to monitor the University's compliance with the AAP's specific obligations.

In order to measure the effectiveness of the AAP, the University may take the following actions:

- Audit its voluntary self-identification process to monitor the number of protected veterans who choose to self-identify and evaluates whether changes could be made to University's self-identification process to encourage greater voluntary self-identification by protected veterans
- Establish a hiring benchmark to measure its progress towards achieving equal employment opportunity for protected veterans
- Review available data computations and analyses regarding applicants and hires
- Review the effectiveness of its recruitment and outreach activities
- Regularly assess its personnel processes to ensure that protected veterans have equal opportunity in employment
- Use a schedule to regularly assess any mental and physical qualifications to ensure that they are job-related and consistent with business necessity
- Audit its communications with vendors and subcontractors to ensure that such communications reflect the University's commitment to equal employment opportunity and affirmative action for protected veterans
- Audit its communications with applicants and employees to ensure that such communications reflect the University's commitment to equal employment opportunity and affirmative action for protected veterans
- Audit its job listings to ensure that the postings reflect the University's commitment to equal employment opportunity and affirmative action for protected veterans, and
Audit its personnel policies to ensure that such policies reflect the University's commitment to equal employment opportunity and affirmative action for protected veterans.

Where the affirmative action program is found to be deficient, the University shall endeavor to undertake necessary action to bring the program into compliance.
List of Exhibits

Exhibit A - Voluntary Veteran Self-Identification Form: Pre and Post Offer Solicitation

Exhibit B - Annual Notification to Vendors
Exhibit A - Voluntary Veteran Self-Identification Form: Pre and Post Offer Solicitation

Name: _____________________________________________ Date: _______________

This employer is a government contractor subject to the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended (VEVRAA), which requires government contractors to take affirmative action to employ and advance in employment:

(1) disabled veterans;

(2) recently separated veterans;

(3) active duty wartime or campaign badge veterans;

(4) Armed Forces service medal veterans;

These classifications are defined as follows:

• A “disabled veteran” is one of the following:
  - a veteran of the U.S. military, ground, naval or air service who is entitled to compensation (or who but for the receipt of military retired pay would be entitled to compensation) under laws administered by the Secretary of Veterans Affairs;
  - a person who was discharged or released from active duty because of a service-connected disability.

• A “recently separated veteran” means any veteran during the three-year period beginning on the date of such veteran's discharge or release from active duty in the U.S. military, ground, naval, or air service.

• An “active duty wartime or campaign badge veteran” means a veteran who served on active duty in the U.S. military, ground, naval or air service during a war, or in a campaign or expedition for which a campaign badge has been authorized under the laws administered by the Department of Defense.

• An “Armed Forces service medal veteran” means a veteran who, while serving on active duty in the U.S. military, ground, naval or air service, participated in a United States military operation for which an Armed Forces service medal was awarded pursuant to Executive Order 12985.

If you believe you belong to any of the categories of protected veterans listed above, please indicate by checking the appropriate box below. Your Form DD-214 may help you make this determination. As a government contractor subject to VEVRAA, we request this information in order to measure the effectiveness of the outreach and positive recruitment efforts we undertake pursuant to VEVRAA. Submission of this information is voluntary and refusal to provide it will not subject you to any adverse treatment. The information provided will be used only in ways that are consistent with VEVRAA.

☒ I identify as one or more of the classifications of protected veterans listed above
I am not a protected veteran

I decline to disclose my veteran status

If you are disabled veteran, please let us know if there any reasonable accommodations we could make that would enable you to be considered for a job opening or perform the essential functions of the position you hold. We consider requests for accommodation on a case-by-case basis.
Exhibit B - Annual Notification to Vendors

To Whom It May Concern:

This letter is to inform you Seattle - Main Campus is committed to the principles of equal employment opportunity. Moreover, as a government contractor subject to by Executive Order 11246, as amended, the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended, and Section 503 of the Rehabilitation Act of 1973, as amended, Seattle - Main Campus takes its affirmative action obligations very seriously. Seattle - Main Campus states as its Policy of Affirmative Action the following:

- It will be the policy of Seattle - Main Campus not to discriminate on the basis of sex, gender identity, sexual orientation, race, color, religious creed, national origin, physical or mental disability, protected veteran status, or any other characteristic protected by applicable law. This policy applies to all recruitment, hiring, training, and promotion decisions for all job titles.

- All employment decisions shall be consistent with the principle of equal employment opportunity, and only job related qualifications will be required.

- All personnel actions, such as compensation, benefits, transfers, tuition assistance, social and recreational programs, etc. will be administered without discrimination on the basis of sex, gender identity, sexual orientation, race, color, religious creed, national origin, physical or mental disability, protected veteran status, or any other characteristic protected by applicable law.

As a vendor or subcontractor, you are notified you may be subject to the regulations implementing Executive Order 11246, as amended, the Vietnam Era Veterans’ Readjustment Assistance Act of 1974, as amended, and Section 503 of the Rehabilitation Act of 1973, as amended, including: 41 CFR Section 60-300.5(a); 41 CFR Section 60-741.5(a); 41 CFR Section 60-1.4(a) and (c); 41 CFR Section 60-1.7(a); 41 CFR Part 60-2, 48 CFR Section 52.222-54(e); and 29 CFR Part 471, Appendix A to Subpart A with respect to affirmative action program and posting requirements.

As applicable, you shall abide by these requirements which require that covered entities not discriminate and take affirmative action on the basis of sex, gender identity, sexual orientation, race, color, religious creed, national origin, physical or mental disability, and protected veteran status.

To assure compliance with the University’s AAP, Shelley Kostrinsky, Equal Opportunity and Affirmative Action Officer, has been designated to administer and monitor the Program and make reports to Senior Management.