

AFFIRMATIVE ACTION PROGRAM FOR INDIVIDUALS WITH DISABILITIES

University of Washington

November 1, 2022 through October 31, 2023

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Preface

University of Washington, (also referred to as the University), is committed to the concept and practice of equal opportunity and affirmative action. In preparing this Affirmative Action Program (AAP), we have been guided by Section 503 of the Rehabilitation Act of 1973 (as amended) (29 U.S.C. § 793) and its implementing regulations (41 C.F.R. Part 60-741) and the Guidelines on Affirmative Action issued by the Equal Employment Opportunity Commission ("EEOC") (29 C.F.R. Part 1608). 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, or to sanction the discriminatory treatment of any person.

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 proprietary document of the University. 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. 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.

If this AAP or any supporting data or documentation are submitted to the 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), the Equal Employment Opportunity Commission, any local or state fair employment practice agency, or any other federal, state or local government agency, 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. The University requests this information be treated as exempt from public disclosure under the Freedom of Information Act, 5 U.S.C. § 552.

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.

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.

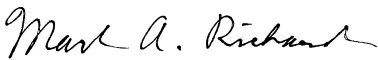
Equal Employment Opportunity and Affirmative Action Statement of Policy

The University of Washington reaffirms its policy of equal opportunity regardless of race, color, creed, religion, national origin, sex, citizenship, sexual orientation, age, marital status, gender identity or expression, genetic information, 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,
- UW Executive Order No. 31,
- 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 eoaa@uw.edu for more information.



Mark Richards

Provost and Executive Vice President for Academic Affairs

Definitions

41 C.F.R. 60-741.2

"DISABILITY" means, generally, (i) a physical or mental impairment that substantially limits one or more of an individual's major life activities, (ii) a record of such impairment, or (iii) being regarded as having such impairment.

For the purposes of this Program, a disability is substantially limiting if it substantially impairs the ability of an individual to perform a major life activity as compared to most people in the general population. An impairment need not prevent, or significantly or severely restrict the individual from performing a major life activity to be considered substantially limiting.

For the purposes of this Program, major life activities include but are not limited to the operation of a major bodily function, caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, sitting, reaching, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, interacting with others, and working.

"A QUALIFIED INDIVIDUAL" means an individual who satisfies the requisite skill, experience, education, and other job-related requirements for the particular position he/she holds or desires and who is capable of performing the essential functions of that position, with or without reasonable accommodation.

Responsibility for Implementation

41 C.F.R. 60-741.44(i)

University of Washington has assigned primary management responsibility and accountability for ensuring full compliance with the Affirmative Action Program to Shelley Kostrinsky, the Affirmative Action Officer of the University. The Affirmative Action Officer has the authority, resources, support of and access to top management necessary to ensure the effective implementation of the AAP. The identity of the Affirmative Action Officer appears on internal and external communications regarding the University's equal employment opportunity and affirmative action policies.

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 managers and supervisors the University is obligated to prevent discrimination and harassment of applicants and employees on any basis protected by law
- Identifying any problem areas in implementing the AAP, and developing solutions
- Ensuring policies are in place to identify any barriers to employment for individuals with known disabilities and assisting managers in developing possible reasonable accommodations to ensure individuals with disabilities benefit from equal employment opportunities
- Designing and implementing an internal audit and reporting system to 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 with known disabilities have the opportunity to participate in University-sponsored employment, educational, training, recreational, and social activities, and ensure each 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 individuals with disabilities
- Encouraging active involvement by University representatives in the community service programs of local organizations of and for individuals with disabilities

- 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 developments in the affirmative action area.

Request for Self-Identification

41 C.F.R. 60-741.42

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 University of Washington to measure and improve, if necessary, the effectiveness of the University's affirmative action efforts, the University invites applicants and employees to voluntarily self-identify as a person with a disability as follows:

- When an applicant applies or is considered for employment, the University provides the applicant with an opportunity to voluntarily self-identify disability status. This opportunity is offered at the same time the University invites the applicant to self-identify race, ethnicity, sex, and veteran status.
- Following an offer of employment but before an individual begins working, the University provides an additional opportunity to voluntarily self-identify disability status.
- Recognizing an individual's status regarding disability may change over time and/or an employee may feel more comfortable disclosing an existing disability after being employed for a period of time, the University also offers employees an opportunity to voluntarily self-identify their disability status at least once every five years. In addition, at least once during the five-year intervals between workplace surveys, the University sends employees a written reminder they may voluntarily update their disability status.
- The University invites applicants and employees to voluntarily self-identify as an individual with a disability using the language and form approved by the government for such purposes. 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 Processes

41 C.F.R. 60-741.44(b)

University of Washington periodically reviews its personnel procedures to determine whether they ensure the careful, thorough, and systematic consideration of the job qualifications of employees or applicants with known disabilities for jobs filled either by hiring or promotion and for educational or training opportunities.

Vacancies are advertised, and applications are accepted from any interested person. The University's employment materials, including items such as its employment application, the careers section of its website, and job advertisements, will include a non-discrimination statement to further inform applicants of the University's policy of equal employment opportunity. All non-executive positions lasting three days or more not expected to be filled from within will be referred to the appropriate state employment service delivery system. In addition, to ensure qualified individuals with disabilities are aware of job openings, the University will send vacancy announcements to the employment sources listed in this Affirmative Action Program.

The disability of any otherwise qualified individual who applies for any vacancy, promotion, transfer, or training opportunity will not be a factor in employment decisions. The University periodically reviews any physical and mental job qualifications to ensure they do not tend to screen out individuals with disabilities 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 reviews its personnel processes to ensure individuals with disabilities are not stereotyped in a manner that limits their access to jobs for which they are qualified. The University also ensures applicants and employees with disabilities who meet job qualifications have equal access to its personnel processes, including those implemented through information and communication technologies, and provides necessary reasonable accommodation to ensure applicants and employees with disabilities receive equal opportunity in the operation of personnel processes.

The Office of Academic Personnel and UW Human Resources review annually the process of personnel actions to include the process of applying, selection, advancement, promotion, and separations of employees at the beginning of the academic or calendar year. The next review is expected next calendar year and/or when any new process is put in place.

Review of Physical and Mental Job Requirements

41 C.F.R. 60-741.44(c)

University of Washington 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 a position.

The University 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 separated 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, the University will ensure the requirements are related to the specific job for which the individual is being considered and are consistent with business necessity and the safe performance of the job.

Each time a new job profile is created or modified, a review of physical and mental qualifications is performed.

Reasonable Accommodations

41 C.F.R. 60-741.44(d)

University of Washington has made and will continue to make reasonable accommodation to the known physical and mental limitations of otherwise qualified employees and job applicants unless such accommodation would impose an undue hardship.

If an individual has a disability, the University encourages the individual to request reasonable accommodation to enable the individual to perform a job safely. Such accommodations may include special equipment, changes in the physical layout of the job, modification of job duties, or other reasonable accommodations. The University will inform employees and applicants of the process for requesting reasonable accommodation.

Where an employee with a known disability is having significant difficulty performing job duties and the University reasonably concludes that the performance issues may be related to a known disability, the University may notify the employee of the performance problem and confidentially inquire whether the problem is related to the employee's disability. If the employee indicates that a disability is impacting performance, the University will engage in confidential discussions with the employee about the performance problem and the need for reasonable accommodation.

Compensation

41 C.F.R. 60-741.21(a)(9)

In offering employment or promotions, University of Washington does not reduce the amount of compensation offered to individuals with disabilities 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.

Harassment

41 C.F.R. 60-741.44(e)

University of Washington has developed and implemented policies and procedures to ensure employees who are individuals with disabilities are not harassed because of their disability status.

A copy of the University's Equal Employment Opportunity and Affirmative Action Statement of Policy, which forbids harassment against individuals based on protected characteristics, is included in this AAP.

Training

41 C.F.R. 60-741.44(j)

University of Washington trains personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes to ensure the commitments in the University's AAP are implemented.

- A Practical Approach to Anti-Racism (typically offered summer and winter quarters)
- The Challenge of Allyship (typically offered summer and winter quarters)
- Conversations About Race in the Workplace (typically offered summer quarter)
- Creating an Inclusive Workplace Through Emotional Intelligence (typically offered spring and autumn quarters)
- Exploration of Race in the Workplace: A Guide for Self-Study (offered quarterly)
- Exploring Cultural Competence (typically offered summer and winter quarters)
- Leadership for a Global Perspective (typically offered spring and autumn quarters)
- Race, Bias, and Dissonance (typically offered spring and autumn quarters)
- Supervising in a Diverse Workplace (typically offered summer and winter quarters)
- What's the Word: Inclusivity in Language (typically offered summer and winter quarters)
- Working across Generations (typically offered summer and winter quarters)
- Building a Positive Work Culture (offered quarterly)
- Courageous Collaboration (typically offered spring and autumn quarters)
- Employment Law and UW Policies (typically offered spring and autumn quarters)
- Peer Coaching (typically offered spring and autumn quarters)
- Respectful Partnerships (typically offered spring and autumn quarters)
- Training, Coaching, and Mentoring for Success (typically offered spring and autumn quarters)

Internal Dissemination of Policy

41 C.F.R. 60-741.44(g)

University of Washington 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 individuals with disabilities. The University may utilize the following procedures to enhance the internal implementation and dissemination of its Equal Employment Opportunity and Affirmative Action Statement of Policy, as appropriate:

- The University's Equal Employment Opportunity and Affirmative Action Statement of Policy will be made available to applicants and employees. The policy 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 Rehabilitation Act of 1973, as amended.
- An invitation to participate in the University's Affirmative Action Program by voluntarily self-identifying as an individual with a disability will be disseminated to all applicants, as well as to all employees once the University has extended a job offer, but before beginning employment duties. In addition, in recognition that an individual's disability status may change and/or that employees may feel more comfortable disclosing an existing disability after a period of time in the University, the University will distribute the invitation to all current employees at least once every five years, with a reminder at least once between each five year period.
- The University will publicize the policy in University publications.
- The University will hold meetings with executive, management and supervisory personnel to explain the University's policy of affirmative action and to make clear the President's support for the policy.
- The University will inform applicants and employees of its commitment to engage in affirmative action, including by discussing the policy in various employee and manager training sessions.
- When employees are featured in employee handbooks or similar publications, efforts will be made to include individuals with disabilities.
- University publications will include articles on accomplishments of all employees, including individuals with disabilities.

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 Rehabilitation Act of 1973, as amended, and is committed to take affirmative action to employ and advance in employment persons with disabilities, and the University will not discriminate against

individuals with physical or mental disabilities. For those sites that are not subject to a collective bargaining agreement, no notification of union officials is necessary.

Outreach, Positive Recruitment and External Dissemination of Policy

41 C.F.R. 60-741.44(f)

University of Washington has reviewed its employment practices to determine whether its personnel programs are designed to effectively recruit and advance in employment qualified individuals with disabilities. While the University believes there are no deficiencies in its current employment practices with respect to applicants and employees with disabilities, it engages in outreach, positive recruitment, and external dissemination programs to augment its existing affirmative action efforts. The University engages in or has made plans to implement the activities outlined in this AAP, as appropriate.

The University will inform recruiting sources of University of Washington's policy of affirmative action for individuals with disabilities. Recruiting sources will be requested to actively recruit and refer qualified individuals with disabilities for all positions.

The University will make the Equal Employment Opportunity Clause part of all covered subcontracts and purchase orders.

The University will inform subcontractors, including subcontracting vendors and suppliers, of its Equal Employment Opportunity and Affirmative Action Statement of Policy, and request appropriate action on their part.

The University will identify local organizations and/or community agencies known to specialize in placing and/or developing training programs for individuals with disabilities and send them notices of vacant positions. Examples of these outreach efforts may include contacting the following:

- State Vocational Rehabilitation Service agencies, mental health agencies, and/or developmental disabilities agencies near the facilities covered in this AAP
- Employment One-Stop Career Centers near the facilities covered in this AAP
- Department of Veterans Affairs offices close to the facilities covered in this AAP
- Entities funded by the Department of Labor that provide recruitment or training services for individuals with disabilities, such as those provided through the Employer Assistance and Resource Network (EARN) near the facilities covered in this AAP
- Local Employment Network (EN) organizations listed in the Ticket to Work Employment Network Directory near the facilities covered in this AAP
- Local disability groups, organizations or Centers for Independent Living near the facilities covered in this AAP

- Placement or career offices of educational institutions specializing in the placement of individuals with disabilities
- Private recruitment sources, such as professional organizations or employment placement services specializing in the placement of individuals with disabilities
- • Ability jobs
 - American Association for Access, Equity and Diversity
 - American Job Centers (AJCs)
 - CareerOneStop "Business Center"
 - Disabled Veterans' Outreach Program Specialists (DVOPS) & Local Veterans' Employment Representatives (LVERs)

Recruitment efforts at educational institutions may incorporate special efforts to reach students who are individuals with disabilities.

Efforts will be made to have employees with disabilities serve as company representatives during career days, job fairs, and related recruitment efforts.

Advertisements or solicitations for prospective employees will indicate the University is an equal opportunity employer.

Assessment of Outreach and Recruitment Efforts

41 C.F.R. 60-741.44(f)(3)

University of Washington evaluates available data regarding the effectiveness of its outreach and recruitment efforts on an annual basis. For areas where the University concludes the totality of its efforts were not effective in identifying and recruiting qualified individuals with disabilities, University of Washington will identify and implement alternative efforts.

Criteria used to evaluate the effectiveness of outreach efforts may include:

- Results of utilization analysis for individuals with disabilities
- Available data related to applicant and hires
- Whether the activity increased the University's ability to include individuals with disabilities in its workforce
- Whether the activity attracted qualified individuals with disabilities
- Whether the activity resulted in the selection of qualified individuals with disabilities

The following lists the outreach programs University of Washington participated in from November 01, 2021 to October 31, 2022: • Ability jobs

- American Association for Access, Equity and Diversity
- American Job Centers (AJCs)
- CareerOneStop "Business Center"
- Disabled Veterans' Outreach Program Specialists (DVOPS) & Local Veterans' Employment Representatives (LVERs)

The University will continue to monitor and review outreach sources to evaluate the effectiveness of outreach and recruitment efforts.

Audit and Reporting Systems

41 C.F.R. 60-741.44(h)

It is the responsibility of the University's Affirmative Action Officer to monitor all employment and personnel practices to ensure compliance with applicable regulations and adherence to the University's Equal Employment Opportunity and Affirmative Action Statement of Policy, to report specific problems to the appropriate management personnel, and to measure the effectiveness of University of Washington'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 with known disabilities have had the full opportunity to equal employment and to participate in all University sponsored educational, training, recreational and social activities
- Measure the University's compliance with the AAP's specific obligations
- Document the actions taken to monitor the University's compliance with the AAP's specific obligations.

To measure the effectiveness of the AAP, the University may take the following actions:

- Audit the University's voluntary self-identification process to monitor the number of individuals with disabilities who choose to self-identify and evaluate whether changes could be made to the self-identification process to encourage greater voluntary self-identification by individuals with disabilities
- Monitor records of applicant flow, referrals, placements, training, transfers, promotions, terminations, and compensation decisions to evaluate the degree to which equal employment opportunity and organizational objectives are being obtained
- Report on the organization's progress towards equal employment opportunity and any identified problem areas so appropriate steps can be taken to resolve any issues
- Examine the University's utilization of individuals with disabilities and develop action-orientated programs to address any areas of underutilization
- Review available data computations and analyses regarding applicants and hires
- Review the effectiveness of the University's recruitment and outreach activities
- Regularly assess the University's personnel processes to ensure individuals with disabilities have equal opportunity in employment
- Use a schedule to regularly assess any mental and physical qualifications to ensure they are job-related and consistent with business necessity

- Audit communications with vendors and subcontractors to ensure such communications reflect the University's commitment to equal employment opportunity and affirmative action for individuals with disabilities
- Audit communications with applicants and employees to ensure such communications reflect the University's commitment to equal employment opportunity and affirmative action for individuals with disabilities
- Audit job listings to ensure the postings reflect the University's commitment to equal employment opportunity and affirmative action for individuals with disabilities
- Audit personnel policies to ensure such policies reflect the University's commitment to equal employment opportunity and affirmative action for individuals with disabilities

Where the Affirmative Action Program is found to be deficient, the University shall endeavor to undertake necessary action to improve the Program.

Data Collection Analysis

41 C.F.R. 60-741.44(k)

University of Washington documents computations or comparisons pertaining to applicants and hires on an annual basis and maintains the documentation for a period of three years.

Utilization Analysis

41 C.F.R. 60-741.45

University of Washington will compare the representation of employees with known disabilities with the utilization goal identified by the OFCCP in effect at the start of the Affirmative Action Program year. In conducting this analysis, the following principles apply:

- The purpose of the utilization goal established by the OFCCP is to provide a benchmark against which the University may measure the representation of individuals with disabilities in its workforce.
- The utilization goal serves as an equal employment opportunity objective that should be attainable by the affirmative action measures included in this Affirmative Action Program. The utilization goal is not a quota that must be met, nor is it to be considered as a ceiling that limits or restricts the employment of individuals with disabilities.
- In all employment decisions, the University makes selections in a nondiscriminatory manner. Utilization goals do not provide a justification to extend a preference to any individual, select an individual, or adversely affect an individual's employment status, because of that individual's disability status.
- Utilization goals do not create set-asides for specific groups, nor are they intended to achieve proportional representation or equal results.
- Utilization goals are not used to supersede merit selection principles, nor do these utilization goals 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 utilization goal has not been attained in one or more job groups does not constitute a finding nor admission of discrimination.

Identification of Problem Areas

41 C.F.R. 60-741.45(e)

When the Utilization Analysis conducted in accordance with the regulations indicates the representation of individuals with known disabilities is less than the current goal identified by OFCCP, University of Washington will take steps to assess whether and where impediments to equal employment opportunity exist, including the following, as appropriate:

- Sources which have provided limited qualified candidates will be reviewed, and the Affirmative Action Officer will identify actions which may increase the number of qualified applicants received.
- The Affirmative Action Officer will review positions or job groups that require specialized skill sets or physical requirements.
- The Affirmative Action Program monitoring reports will be reviewed.
- The Affirmative Action Officer will review the University's personnel processes to ensure the careful, thorough, and systematic consideration of the job qualifications of applicants and employees with known disabilities and that no barriers to equal employment opportunities exist.

Based on this analysis, we have developed and will execute the action-oriented programs described in this AAP.

Development and Execution of Action-Oriented Programs

41 C.F.R. 60-741.45(f)

To demonstrate good faith efforts to expand employment opportunities for individuals with disabilities and to produce measurable results, University of Washington developed and executed the following action-oriented programs, as appropriate:

- The University will continue to analyze all job requirements to ensure any physical or mental requirements are job related and consistent with business necessity.
- The University will carefully evaluate the total selection process to ensure it is free from discrimination.
- University employees will be trained on the University's non-discrimination and anti-harassment policies.
- The University will evaluate its techniques for improving recruitment and increasing the flow of qualified applicants with disabilities and identify alternative or additional outreach and recruitment efforts to increase recruitment of individuals with disabilities, as further described in the evaluation of the effectiveness of the University's outreach efforts.
- The University will review its programs and procedures to ensure employees with disabilities are given equal opportunities for promotion. The University will continue to make opportunities for advancement widely known through the University's internal posting process which encourages all employees, including employees with disabilities, to apply for any open position for which they are qualified with or without reasonable accommodation.
- The University will review its termination procedures to ensure they are applied consistently, and termination decisions are not made for unlawful reasons.
- The University will assess its personnel processes to ensure no barriers to employment exist. The University's review will be documented in this AAP.
- The University will review the results of its affirmative action audit and take steps to review or enhance practices that might affect the success of the Affirmative Action Program. The audit and reporting system will be documented in this AAP.