AFFIRMATIVE ACTION PLAN

June 1, 2014 through May 31, 2015 Plan Year

University of Arkansas for Medical Sciences Medicine
UNIVERSITY OF ARKANSAS FOR MEDICAL SCIENCES

AFFIRMATIVE ACTION PLAN

FOR MINORITIES & WOMEN

June 1, 2014 through May 31, 2015 Plan Year

Table of Contents

Introduction ........................................................................................................................................1
Designation of Responsibility for Implementation of the Plan .........................................................2
Identification of Problem Areas by Organization Units and Job Groups ...........................................4
Development and Execution of Action Oriented Programs ..............................................................5
Internal Audit and Reporting Requirements ....................................................................................7
University of Arkansas for Medical Sciences (UAMS) sets forth this affirmative action plan (plan) for the plan year beginning June 1, 2014, reaffirming its commitment to the spirit and letter of affirmative action law. Through the implementation of this plan, University of Arkansas for Medical Sciences continues its efforts to comply with appropriate government regulations and to make the best possible use of personnel while contributing to the betterment of society and the community.

In developing this plan, UAMS recognizes its duty to ensure equal employment opportunity.
A. Identification and Responsibilities of EEO/AA Officer

Overall responsibility for UAMS’s plan rests with the EEO/AA Officer, Odette Woods. Odette Woods ensures that the plan complies with all applicable laws, orders and regulations, including but not limited to Executive Order 11246 and its progeny. Specifically, Odette Woods or her designated representative’s duties include:

1. Developing, maintaining and, where appropriate, modifying UAMS’s plan to ensure compliance with the law.

2. Developing and, where appropriate, modifying procedures for effectively communicating the plan and its elements both internally and externally.

3. Identifying problem areas and their causes.

4. Assisting management in finding equitable solutions, where feasible, to any identifiable problem areas.

5. Evaluating the effectiveness of UAMS’s plan on a regular basis, and reporting to management.

6. Designing, implementing, and overseeing audit and reporting systems that measure plan effectiveness, identify need for remedial action, and determine the degree to which objectives have been achieved.

7. Acting as a Hospital representative in dealing with any government agencies.

8. Monitoring Hospital policies and procedures with regard to the various terms and conditions of employment to attempt to ensure compliance with affirmative action obligations.

9. Keeping management up to date on the latest developments in the areas of EEO and affirmative action.

10. Serving as a liaison between UAMS and various organizations, such as, minority organizations and women’s organizations.

11. When necessary, developing management training programs to increase protected group participation.

12. Assisting in the investigation, handling and disposition of employee complaints of discrimination and harassment.
B. **Management Responsibilities**

Line and upper management including the CEO, share responsibility for the plan, including but not limited to the following:

1. Assisting in auditing plan progress, including: identifying problem areas, formulating solutions, establishing appropriate goals, and developing necessary training programs.

2. Discussing UAMS’s EEO/AA policies with all personnel, including management, to ensure that UAMS’s policies and the need for their support are understood at all levels.

3. Reviewing the qualifications of employees under their supervision to seek to ensure that protected groups are being treated fairly when it comes to selection decisions.

4. Making available career counseling, when appropriate.

5. Conducting periodic reviews of offices to ensure compliance in the areas of proper display of posters and notices, comparable facilities for both sexes, and opportunity for participation in Hospital-sponsored recreational, educational and social activities.

6. Reviewing position descriptions to see that they adequately reflect the job to be performed.

7. Auditing training programs, hiring and promotion patterns.

8. Assisting subordinates and upper management in the prevention of harassment.
UAMS’s commitment to fully implement this policy and plan include periodic reviews of critical workforce factors. UAMS will evaluate the following:

1. The workforce by organizational unit and job group to determine whether there are problems of minority and female utilization or distribution.

2. Personnel Activity (Applicant flow, hires, terminations, promotions and other personnel actions) to determine whether there are selection disparities.

3. Compensation systems to determine whether there are gender, race or ethnic based disparities.

4. Selection, recruitment, referral and other personnel procedures to determine whether they result in disparities in the employment or advancement of minorities or women.

5. Any other areas that might support the success of the Affirmative Action Program.

6. Qualifications are job related and do not have any statistically significant impact on minorities or women.

7. Selection forms, such as applications for employment, comply with federal and state employment laws.

8. Periodically, UAMS reviews its job descriptions to ensure that they properly reflect the actual functions and duties of the position.

9. Comparisons of hires to applicants indicate no statistically significant impact on minorities and women.

10. UAMS encourages minorities and women to participate in Hospital-sponsored activities and programs.

11. There is no “de facto” segregation.

12. There is no artificially created barriers or restrictive seniority provisions.
Development and Execution of Action Oriented Programs

UAMS’s various action oriented programs help UAMS maintain equal employment opportunity in the workforce.

1. UAMS periodically reviews job descriptions attempting to ensure that they accurately reflect job related duties and responsibilities.

2. UAMS annually reviews job qualifications for job relatedness.

3. Job descriptions and qualifications are available to those involved in the selection process.

4. University of Arkansas for Medical Sciences makes good faith efforts to select the most qualified candidates regardless of race, color, national origin, religion, sex, sexual orientation, or gender identity. UAMS recognizes the duty, should the need arise, to remedy statistically significant under-utilization of minorities and women. Accordingly, UAMS commits to:

   a. Provide assistance, such as training and guidance, to employees who are involved in the recruitment, selection, discipline and other related processes, so that personnel actions remain neutral to race, color, religion, sex, Sexual orientation, gender identity, and national origin; and

   b. Review selection techniques and employment standards so that they do not adversely impact minorities or women.

5. UAMS employs appropriate methods to encourage a satisfactory flow of qualified minorities and women applicants, including but not limited to the following:

   a. UAMS, when possible, utilizes minorities and women in the human resources department.

   b. UAMS encourages minorities and women to refer qualified applicants for potential employment.

   c. UAMS recruits minority and female applicants at predominantly minority and female schools, especially if under-utilized.

   d. UAMS considers using special employment programs designed to deal with under-utilization. Business conditions remain the key factor in any decision to develop/implement such programs.

   e. Whenever possible and appropriate, UAMS participates in job fairs, career days, youth motivation programs and other programs that foster exposure for qualified minorities and women.

   f. UAMS utilizes various community organizations and schools as referral sources.
6. UAMS reviews promotion criteria and procedures so that job qualifications form the basis for the promotional decisions without regard to race, color, sex, sexual orientation, gender identity, religion or national origin. UAMS monitors promotion rates for minorities and women and, when necessary, may employ one or more of the following procedures:

a. Maintain an inventory of current minority and women employees to determine special job-related talents, skills and experience.

b. Provide job training, job-related courses or certificate programs.


d. Review work specifications and job qualifications to ensure job relatedness.

e. Inventory promotion decisions for impact on women or minorities.

f. Conduct career counseling, while appropriate, during performance evaluations.

g. Inform employees about educational programs and other opportunities available to improve their employment prospects.

h. Post or otherwise announce promotional opportunities.

i. Review seniority practices and seniority clauses in union contracts to avoid discriminatory effects.

j. Review Hospital-sponsored social and recreational activities to ensure non-discriminatory participation and availability.
Internal Audit and Reporting Requirements

Odette Woods, UAMS’s EEO/AA Officer, maintains an internal audit system to attempt to oversee UAMS’s plan and assess progress. This enables UAMS to determine areas for improvement and affirmative efforts. The audit system includes:

1. Review of various employment decisions, such as job referrals, hiring decisions, transfers, promotions and terminations. UAMS maintains summary data where necessary and feasible, and conducts regular reviews at least annually to ensure that non-discriminatory policy is coordinated.

2. Internal reporting on a schedule basis to the degree to which equal employment opportunities and organizational objectives are attained.

3. Review of report results with all levels of management; and

4. Advice to top management of program effectiveness and submission of recommendations to improve unsatisfactory performance.
AFFIRMATIVE ACTION PLAN

June 1, 2014 through May 31, 2015 Plan Year

University of Arkansas for Medical Sciences Medicine
University of Arkansas for Medical Sciences

AFFIRMATIVE ACTION PLAN
For Persons with a Disability and Protected Veterans

June 1, 2014 through May 31, 2015 Plan Year

CONFIDENTIAL TRADE SECRET

University of Arkansas for Medical Sciences

AFFIRMATIVE ACTION PLAN

For Persons with a Disability and Protected Veterans

June 1, 2014 through May 31, 2015 Plan Year

AAP Approved by: ____________________________________________
Dr. Daniel Rahn
Chancellor

AAP Prepared and Approved by: ________________________________
Odette Woods
EEO Administrator

Dunn & Bradstreet Number:
Table of Contents

Introduction ................................................................................................................................. 12
Definitions ................................................................................................................................. 13
Equal Employment Opportunity Policy .................................................................................. 15
Identification of Problem Areas/Review of Personnel Processes ........................................... 16
Action Oriented Programs ....................................................................................................... 17
Physical and Mental Qualifications ........................................................................................ 17
Reasonable Accommodation to Physical and Mental Limitations ......................................... 18
Harassment .............................................................................................................................. 19
Internal Dissemination of EEO Policy ..................................................................................... 20
External Dissemination of EEO Policy ..................................................................................... 21
Audit and Reporting Systems .................................................................................................. 23
Responsibility for Implementation of Plan .............................................................................. 23
Training ...................................................................................................................................... 25
University of Arkansas for Medical Sciences sets forth this affirmative action plan (“plan”) for the plan year beginning 2014 reaffirming its commitment to the spirit and letter of affirmative action law. Through the implementation of this plan, University of Arkansas for Medical Sciences continues its efforts to comply with appropriate government regulations and to make the best possible use of personnel while contributing to the betterment of society and the community.

In developing this plan, University of Arkansas for Medical Sciences recognizes its duty to ensure equal employment opportunity. The following statement of policy reinforces that belief.

In setting forth this plan, University of Arkansas for Medical Sciences reaffirms its belief in equal employment opportunity for all employees and applicants for employment in all terms and conditions of employment.
This plan contains specific provisions regarding protected veterans and individuals with disabilities. Definitions applicable to the Vietnam Era Veterans Readjustment Assistance Act (VEVRAA) are as follows:

**Armed Forces Service Medal Veteran** - 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 to which an Armed Forces service medal was awarded pursuant to Executive Order 12985 (61 FR 1209).

**Disabled Veteran** – 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.

**Other Protected Veteran** - 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.

**Pre-JVA Veteran** - an individual who is an employee of or applicant to a contractor with a contract of $25,000 or more entered into prior to December 1, 2003 and unmodified since to $100,000 or more, and who is a special disabled veteran, veteran of the Vietnam era, pre-JVA recently separated veteran, or other protected veteran.

**Pre-JVA Recently Separated Veteran** - a pre-JVA veteran during the one-year period beginning on the date of the pre-JVA veteran’s discharge or release from active duty.

**Protected Veteran** - a veteran who is protected under the non-discrimination and affirmative action provisions of VEVRAA; specifically, a veteran who may be classified as a “disabled veteran,” “recently separated veteran,” “active duty wartime or campaign badge veteran,” or an “Armed Forces service medal veteran,” as defined by this section.

**Recently Separated Veteran** - 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.

**Special Disabled Veteran** - 1) A veteran 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 Department of Veterans Affairs for a disability: (A) Rated at 30 percent or more; or (B) Rated at 10 or 20 percent in the case of a veteran who has been determined under 38 U.S.C. 3106 to have a serious employment handicap; or 2) A person who was discharged or released from active duty because of a service-connected disability.

**Veteran** - a person who served in the active military, naval, or air service of the United States, and who was discharged or released therefrom under conditions other than dishonorable.
Veteran of the Vietnam Era - a person who 1) Served on active duty for a period of more than 180 days, and was discharged or released therefrom with other than a dishonorable discharge, if any part of such active duty occurred: (A) In the Republic of Vietnam between February 28, 1961, and May 7, 1975; or (B) Between August 5, 1964, and May 7, 1975, in all other cases; or 2) Was discharged or released from active duty for a service-connected disability if any part of such active duty was performed: (A) In the Republic of Vietnam between February 28, 1961, and May 7, 1975; or (B) Between August 5, 1964, and May 7, 1975, in all other cases.

Definitions applicable to Section 503 of the Rehabilitation Act (Section 503) are as follows:

Disability - with respect to an individual: i) A physical or mental impairment that substantially limits one or more major life activities of such individual; ii) A record of such an impairment; or iii) Being regarded as having such an impairment. The definition of “disability” is construed broadly in favor of broad coverage of individuals, to the maximum extent permitted by law. An impairment that substantially limits one major life activity need not limit other major life activities in order to be considered a disability. An impairment that is episodic or in remission is a disability if it would substantially limit a major life activity when active.

Major Life Activities - Major life activities include, but are not limited to, 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 major life activity also includes the operation of a major bodily function, including, but not limited to, functions of the immune system, special sense organs and skin, normal cell growth, digestive, genitourinary, bowel, bladder, neurological, brain, respiratory, circulatory, cardiovascular, endocrine, hemic, lymphatic, musculoskeletal, and reproductive functions. The operation of a major bodily function includes the operation of an individual organ within a body system.

Physical or Mental Impairment - 1) Any physiological disorder, or condition, cosmetic disfigurement, or anatomical loss affecting one or more body systems such as neurological, musculoskeletal, special sense organs, respiratory (including speech organs), cardiovascular, reproductive, digestive, genitourinary, immune, circulatory, hemic, lymphatic, skin, and endocrine; or 2) Any mental or psychological disorder, such as an intellectual disability (formerly termed mental retardation), organic brain syndrome, emotional or mental illness, and specific learning disabilities.

Qualified Individual - an individual who satisfies the requisite skill, experience, education, and other job-related requirements of the employment position such individual holds or desires, and who, with or without reasonable accommodation, can perform the essential functions of such position.
Equal Opportunity Policy

1. The Chancellor supports this affirmative action program.

2. University of Arkansas for Medical Sciences’s Compliance Officer, Odette Woods is assigned and has overall responsibility for the implementation of affirmative action activities required under law.

3. This Company will: recruit, hire, train and promote persons in all job titles, and ensure that all other personnel actions are administered, without regard to protected veteran or individual with disability status; and ensure that all employment decisions are based only on valid job requirements.

4. This Company, through its responsible managers, shall seek to recruit, hire, upgrade, train, and promote without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, status as a veteran, or status as an individual with a disability.

5. Management shall seek to ensure that personnel actions such as compensation, benefits, layoffs, returns from layoffs, sponsored training, educational tuition assistance, and social and recreational programs, shall be administered in a nondiscriminatory fashion.

6. Management shall base employment decisions on the principles of equal employment opportunity and with the intent to further the commitment to equal employment. At no time will covered employees, or covered applicants for employment, who seek assistance pursuant to this policy be subject to discipline, or have opportunities for employment adversely affected because of such efforts.

7. Management shall take affirmative action to seek to ensure that protected veterans, and individuals with disabilities are considered for employment and promotions on a nondiscriminatory basis.

8. Management shall seek to ensure that employees and applicants are not subject to harassment, intimidations, threats, coercion or discrimination because they have engaged in or are engaging in any of the following under EO 11246, The Rehabilitation Act of 1973 or The Veteran ERA Readjustment Assistance Act of 1974:

   a. Filing a complaint,
   b. Assisting or participating in an investigation, hearing or administrative action,
   c. Opposing an unlawful practice, or
   d. Otherwise exercising any other legally protected right.

9. Employees and applicants are given the opportunity to identify themselves as veterans or individuals with disabilities, in accordance 41 C.F.R. §§ 60-300.42 and 60-741.42. This self-identification is strictly voluntary, confidential, and will not result in retaliation.
Benchmark and Utilization Goal

A. VEVRAA Benchmark

University of Arkansas for Medical Sciences’s hiring benchmark pursuant to VEVRAA for this plan year equals the national percentage of veterans in the civilian labor force (currently 8%).

B. Section 503 Utilization Goal and Analysis

University of Arkansas for Medical Sciences annually evaluates its utilization of individuals with disabilities in each job group, using the same job groups established for utilization analyses under Executive Order 11246, either in accordance with 41 CFR part 60-2, or in accordance with 41 CFR part 60-4, as appropriate. Despite the preceding sentence, if University of Arkansas for Medical Sciences determines that it has 100 or fewer employees, it will not use those job groups and instead exercises its option to measure the representation of individuals with disabilities in its entire workforce.

Identification of Problem Areas/Review of Personnel Processes

University of Arkansas for Medical Sciences’s commitment to fully implement this policy and plan include periodic reviews of critical workforce factors. University of Arkansas for Medical Sciences’s review process aims to ensure the following:

1. The personnel processes provide for careful, thorough, and systematic consideration of the job qualifications of applicants and employees with known disabilities for job vacancies filled either by hiring or promotion, and for all training opportunities offered or available.

2. The selection procedures for job vacancies and training opportunities are non-discriminatory and do not adversely affect individuals with disabilities.

3. Qualifications are job related and do not adversely affect individuals with disabilities.

4. Selection forms, such as applications for employment, comply with federal and state employment laws.

5. Periodically, University of Arkansas for Medical Sciences reviews its job descriptions to ensure that they properly reflect the actual functions and duties of the position.
6. University of Arkansas for Medical Sciences encourages individuals with disabilities to participate in Company-sponsored activities and programs, including educational, training, recreational, and social activities.

7. University of Arkansas for Medical Sciences advises vendors, suppliers and subcontractors about University of Arkansas for Medical Sciences’s plan and of their EEO/AA responsibilities.

8. University of Arkansas for Medical Sciences prominently displays Equal Employment Opportunity posters in all appropriate places.

9. University of Arkansas for Medical Sciences personnel policies do not stereotype protected veterans or individuals with disabilities in a manner which limits their access to all jobs for which they are qualified.

10. University of Arkansas for Medical Sciences ensures that applicants and employees with disabilities have equal access to its personnel processes, including those implemented through information and communication technologies. Where necessary, University of Arkansas for Medical Sciences will provide necessary reasonable accommodations to ensure applicants and employees with disabilities receive equal opportunity in the operation of personnel processes.

Action-Oriented Programs

University of Arkansas for Medical Sciences’s various action oriented programs help University of Arkansas for Medical Sciences maintain equal employment opportunity in the workforce. In that regard:

A. Physical and Mental Qualifications

1. University of Arkansas for Medical Sciences periodically reviews job descriptions, attempting to ensure that they accurately reflect job-related duties and responsibilities.

2. University of Arkansas for Medical Sciences annually reviews all physical and mental qualifications with line managers and supervisors for job relatedness.

3. Job descriptions and qualifications are available to those involved in the selection process.

4. University of Arkansas for Medical Sciences makes good faith efforts to select the most qualified candidates regardless of disability or veteran status. University of Arkansas for Medical Sciences commits to review selection techniques and employment standards so that they do not adversely impact veterans and individuals with disabilities.
4. Should University of Arkansas for Medical Sciences utilize either physical or mental job qualification requirements in the selection of applicants or employees for employment, or for other changes in employment status, e.g., promotion, demotion, or training, and the qualification requirements tend to screen out qualified individuals with a disability or protected veterans, it is because the job requirements are related to the particular position, consistent with business necessity, and/or necessary for the safe performance of the job.

B. Reasonable Accommodation

1. It is University of Arkansas for Medical Sciences’s policy to attempt to make a reasonable accommodation to the physical and mental limitations of employees with a disability, qualified applicants, or protected veterans, unless the accommodation imposes an undue hardship on University of Arkansas for Medical Sciences’s business. In determining the extent of University of Arkansas for Medical Sciences’s accommodation obligations, the following factors, among others, are considered:

   a. Business necessity; and
   b. Financial cost and expense.

2. If an employee with a known disability or who is known to be a disabled veteran is having significant difficulty performing his or her job and it is reasonable to conclude that the performance problem may be related to the known disability, the Company confidentially notifies the employee of the performance problem and inquires whether the problem is related to the employee’s disability. If the employee responds affirmatively, the Company confidentially inquires whether the employee is in need of a reasonable accommodation.

3. Employees may contact the Human Resources Department during regular business hours to request an accommodation.

C. Miscellaneous

1. When University of Arkansas for Medical Sciences offers employment or promotion to qualified individuals with a disability or protected veterans, University of Arkansas for Medical Sciences does not reduce the amount of compensation offered because of disability-related and/or military-service related pension or other disability-related and/or military-service related benefit the applicant or employee receives from another source.

2. As for protected veterans, University of Arkansas for Medical Sciences relies only on that portion of the individual’s military record, including his or her discharge papers, relevant to the requirements of the opportunity in issue.

3. When University of Arkansas for Medical Sciences conducts a comprehensive medical examination of a protected veteran or a person with a disability, the results of such an examination are sought to be collected and maintained on separate forms and in separate medical files and treated as a confidential medical record, except that:
Supervisors and managers may be informed regarding necessary restrictions on the work or duties of the applicant or employee and necessary accommodations. First aid and safety personnel may be informed, when appropriate, if the disability might require emergency treatment.

Government officials engaged in enforcing the laws administered by OFCCP, including the 1973 Rehabilitation Act, the 1974 Vietnam Era Veterans Readjustment Act, or enforcing the Americans with Disabilities Act, shall be provided relevant information on request.

Harassment

It is the policy of University of Arkansas for Medical Sciences to treat all employees equally in their terms and conditions of employment. The harassment of any employee is contrary to this policy and may be considered a violation of federal law and will be considered justification for disciplinary or other appropriate action. This policy applies to all employees, supervisors, agents, and non-employees who have contact with employees during working hours.

Harassment is any annoying, persistent act or actions that singles out an employee to that employee’s objection or detriment, because of race, sex, sexual orientation, gender identity age, religion, ancestry, national origin, physical disability, mental condition, or protected veteran’s status. Harassment may include any of the following:

1. Verbal abuse or ridicule. This includes epithets, derogatory comments, slurs or unwanted sexual advances, invitations, or comments.
2. Interference with an employee’s work. This includes physical contact such as assault, blocking normal movement, or interference with work directed at an individual because of his/her sex, sexual orientation, gender identity or other protected status.
3. Displaying or distributing sexually offensive, racist or derogatory materials. This includes derogatory posters, cartoons, drawings or gestures.
4. Discriminating against an employee in work assignments or job-related training.
5. Intimate physical contact.
6. Making sexual or racial innuendos.
7. Demanding favors (sexual or otherwise), explicitly or implicitly, as a condition of employment, promotion, transfer or any other term or condition of employment.
8. Retaliation for having reported harassment.
It is every employee’s responsibility to ensure that his or her conduct does not include or imply harassment in any form. If, however, harassment or suspected harassment has or is taking place, the following will apply:

1. Any harassment or suspected harassment should be reported to the person’s supervisor. If the harassment involves the supervisor, then the harassment should be reported to the EEO Officer. A written statement by the complainant setting forth all pertinent facts may be required.

2. Any supervisor who receives a report of or has knowledge of harassment shall promptly inform the EEO Officer, who will then determine whether further investigation is warranted.

3. Each complaint shall be investigated by the EEO Officer or designee and a determination of the facts will be made on a case-by-case basis. Appropriate action up to and including discharge may then be taken.

4. The results of the investigation shall be attempted to be kept confidential and provided only to those employees of University of Arkansas for Medical Sciences on a need-to-know basis.

5. The investigative files, including the complaint, shall be maintained by the EEO Officer. Any disciplinary action taken will also be documented in the employee’s personnel file.

University of Arkansas for Medical Sciences will not tolerate harassment or any form of retaliation against an employee who has either instigated or cooperated in an investigation of alleged harassment. Violation of this provision may result in discharge.

Dissemination of EEO Policy

The following exemplify the methods that may be utilized in University of Arkansas for Medical Sciences’s ongoing efforts to ensure continuing dissemination of its policy and plan:

A. **Internal Dissemination**

   1. Internal employee manuals contain the policy statement and are otherwise available to employees.

   2. The policy statement is posted on bulletin boards accessible to employees and applicants. Special efforts will be made to ensure that those with known visual or other sign limiting disabilities are informed of the contents of the notice.
3. University of Arkansas for Medical Sciences references the policy and progress in its annual report, newspaper, magazine and other publications. Orientation meetings for new employees and in-house employment related training include references to University of Arkansas for Medical Sciences’s policy.

4. University of Arkansas for Medical Sciences publications, if any, including those with photographs, feature individuals with disabilities and veterans, and where feasible, include articles on accomplishments of individuals with disabilities.

5. Pertinent portions of the plan are available during regular business hours for inspection by employees and applicants for employment so that they may avail themselves of the plan’s benefits.

6. The plan has been explained at meetings with the executive, management, and supervisory personnel.

7. University of Arkansas for Medical Sciences has notified union officials and/or employee representatives and requested their cooperation regarding the policy.

8. The Company will also invite individuals with a disability and protected veterans, before and after an offer of employment but before work has begun, to identify themselves to management and request any reasonable accommodation. This opportunity remains available. Employees are also invited to self-identify as an individual with a disability or veteran. Any person who avails his/herself will be free from retaliation based upon the self-identification. Further, efforts will be made to keep confidential that identification.

B. External Dissemination

1. University of Arkansas for Medical Sciences advises recruitment sources, protected groups’ organizations, community agencies, business leaders, secondary schools and colleges annually in writing of its commitment to its policy and plan. University of Arkansas for Medical Sciences informs these sources that job applicants will be treated without regard to disability or protected veteran’s status. The Company may also hold formal briefing sessions on company premises with representatives from recruiting sources, conducting facility tours, using clear and concise explanations of current and future job openings, position descriptions, worker specifications, explanations of the company’s selection process, and recruiting literature. At any such briefing sessions, Odette Woods will be in attendance when possible. The Company, at all educational institutions, attempts to reach students who are protected veterans and individuals with disabilities.

2. University of Arkansas for Medical Sciences attempts to participate in work-study programs with Department of Veterans Affairs rehabilitation facilities which specialize in training or educating disabled veterans, or similarly work-study programs for students, trainees, or interns with disabilities.

3. University of Arkansas for Medical Sciences attempts to include protected veterans and
individuals with disabilities in career days, youth motivation programs, and related activities in their communities.

4. University of Arkansas for Medical Sciences includes the phrase “EOE/AA” on employment applications, in newspaper advertisements, and other external advertisements. Should pictures be used, then, where feasible, veterans and individuals with disabilities will be pictured.

5. University of Arkansas for Medical Sciences sends written notification of company policy related to its affirmative action efforts to all subcontractors, including subcontracting vendors and suppliers, requesting appropriate action on their part. University of Arkansas for Medical Sciences undertakes appropriate outreach and positive recruiting activities as reasonable under the totality of the circumstances, including the Company’s size, resources, and the extent to which its existing employment practices are adequate. Such efforts may include, but are not limited, to enlisting the assistance and support of the following persons and organizations in recruiting, and developing on-the-job training opportunities for veterans or individuals with disabilities, in order to fulfill its commitment to provide meaningful employment opportunities:

- The Local Veterans’ Employment Representative in the local employment service office (i.e., the One-Stop) nearest the contractor’s establishment;
- The Department of Veterans Affairs Regional Office nearest the contractor’s establishment;
- The veterans’ counselors and coordinators (“Vet-Reps”) on college campuses;
- The service officers of the national veterans’ groups active in the area of the contractor’s establishment;
- Local veterans’ groups and veterans’ service centers near the contractor’s establishment;
- The Department of Defense Transition Assistance Program (TAP), or any subsequent program that, in whole or in part, might replace TAP; and
- Any organization listed in the Employer Resources section of the National Resource Directory (http://www.nationalresourcedirectory.gov/), or any future service that replaces or complements it.
- The State Vocational Rehabilitation Service Agency (SVRA), State mental health agency, or State developmental disability agency in the area of the contractor’s establishment;
- The Employment One-Stop Career Center (One-Stop) or American Job Center nearest the contractor’s establishment;
- The Department of Veterans Affairs Regional Office nearest the contractor’s establishment (www.va.gov);
- Entities funded by the Department of Labor that provide recruitment or training services for individuals with disabilities, such as the services currently provided through the Employer Assistance and Resource Network (EARN) (www.earnworks.com);
- Local Employment Network (EN) organizations (other than the contractor, if the contractor is an EN) listed in the Social Security Administration’s Ticket to Work Employment Network Directory (www.yourtickettowork.com/endir);
• Local disability groups, organizations, or Centers for Independent Living (CIL) near the contractor’s establishment;
• Placement or career offices of educational institutions that specialize in the placement of individuals with disabilities; and
• Private recruitment sources, such as professional organizations or employment placement services that specialize in the placement of individuals with disabilities.

6. University of Arkansas for Medical Sciences incorporates the equal employment opportunity and affirmative action clauses into covered purchase orders, lease agreements and other covered contracts.

7. University of Arkansas for Medical Sciences communicates with the state employment security office in writing regarding the policy.

8. University of Arkansas for Medical Sciences advises prospective employees of the existence of the plan and makes pertinent portions of it available upon request, during regular business hours, so they may avail themselves of its benefits.

9. University of Arkansas for Medical Sciences lists all external job openings with the state employment security office.

10. University of Arkansas for Medical Sciences in making hiring decisions, considers applicants who are known protected veterans or known to have disabilities for all available positions for which they may be qualified when the position(s) applied for is/are unavailable.

11. University of Arkansas for Medical Sciences considers listing its job openings with the National Resource Directory’s Veterans Job Bank.

Audit and Reporting System

A. Implementation

University of Arkansas for Medical Sciences has designed and implements an audit and reporting system that:

1. Measures the effectiveness of the Company’s affirmative action program.
2. Indicates any need for remedial action.
3. Determine the degree to which the Company’s objectives are being attained.
4. Determines whether individuals with known disabilities and Protected Veterans have had the opportunity to participate in all Company-sponsored educational, training, recreational and social activities.

5. Measures the Company’s compliance with the affirmative action program’s specific obligations.

6. Documents the actions taken to comply with these obligations and retains them as employment records for the requisite period of time.

Where the Company finds the affirmative action program to be deficient, the Company undertakes necessary action to bring the program into compliance.

B. Identification and Responsibilities of EEO/AA Officer

Overall responsibility for University of Arkansas for Medical Sciences’s plan rests with its EEO/AA Officer. The EEO/AA Officer ensures that the plan complies with all applicable laws, orders and regulations, including but not limited to the Rehabilitation Act of 1973, the Vietnam Era Veterans Act of 1974 and their progeny. The EEO/AA Officer’s identity appears on all internal and external communications regarding the Company’s affirmative action program. Specifically the EEO/AA Officer or the Officer’s designated representative’s duties include:

1. Developing, maintaining and, where appropriate, modifying University of Arkansas for Medical Sciences’s plan to ensure compliance with the law.

2. Developing and, where appropriate, modifying procedures for effectively communicating the plan and its elements both internally as well as externally.

3. Identifying problem areas and their causes.

4. Assisting management in finding equitable solutions, where feasible, to any identifiable problem areas including any reasonable accommodations.

5. Evaluating the effectiveness of University of Arkansas for Medical Sciences’s plan on a regular basis, and reporting to management.

6. Designing, implementing, and overseeing audit and reporting systems that measure plan effectiveness.

7. Acting as a company representative in dealing with any government agencies.

8. Monitoring policies and procedures including the selection, evaluation, promotion and training process with regard to the various terms and conditions of employment to attempt to ensure compliance with affirmative action obligations.
9. Keeping management up to date on the latest developments in the areas of EEO and affirmative action as well as progress regarding maintenance of this plan.

10. Serving as a liaison between University of Arkansas for Medical Sciences and various organizations, such as, organizations catering to veterans and individuals with disabilities.

11. When necessary, developing sales and management training programs to increase protected group participation.

12. Assisting in the investigation, handling, disposition, and prevention of employee complaints of discrimination and harassment.

C. Management Responsibilities

Line and upper management share responsibility for the plan, including but not limited to the following:

1. Assisting in auditing plan progress, including identifying problem areas, formulating solutions, and developing necessary training programs.

2. Discussing University of Arkansas for Medical Sciences’s EEO/AA policies with all personnel including management to ensure that University of Arkansas for Medical Sciences’s policies and the need for their support are understood at all levels.

3. Reviewing the qualifications of employees under their supervision to seek to ensure that protected groups are being treated fairly when it comes to selection decisions.

4. Making available career counseling, when appropriate.
   a. Conducting periodic reviews of offices to ensure compliance in the areas of: proper display of posters and notices, and opportunity for participation in company-sponsored recreational, educational and social activities.
   b. Reviewing position descriptions to see that they adequately reflect the job to be performed.
   c. Auditing training programs, hiring and promotion patterns.
   d. Assisting subordinates and upper management in the prevention of harassment.

D. Training

University of Arkansas for Medical Sciences provides assistance, such as training and guidance, to employees who are involved in the recruitment, selection, discipline and other related processes, so that personnel actions remain neutral to disability and veteran status.