



# **Affirmative Action Plan**

Protected Veterans
And
Individuals with Disabilities

**October 2024 to September 2025** 



November 25, 2024

Dear Members of the Purdue University Community,

As president of Purdue University, it is my responsibility and privilege to reaffirm the university's unwavering commitment to Equal Opportunity, Equal Access, and Affirmative Action\* – all the principles as stated in the university policy of the same name. In making this statement, I echo the action of the Board of Trustees at its meeting on January 21, 1970:

The University is committed to maintaining an inclusive community which recognizes and values the inherent worth and dignity of every person; fosters tolerance, sensitivity, understanding, and mutual respect among its members; and encourages each individual to strive to reach his or her own potential....

Acts of discrimination against any individual or group are wrong because they foster intolerance, incivility, and intimidation. The University does not condone and will not tolerate discrimination, harassment or intimidation of any individual in the University community for any reason. The University, through its actions, seeks to assure all its members of their rights to protections from the harmful effects of discrimination.... [The] University promotes the full realization of equal employment opportunity through its affirmative action program.

The President of the University is charged with overall responsibility for nondiscrimination and equal opportunity.

In the half century since those words were affirmed by the Board of Trustees, the ideals on which they are based have been built upon with the issuance of the Nondiscrimination Policy Statement and several amendments. Purdue University prohibits discrimination on the basis of race, religion, color, sex, age, national origin or ancestry, genetic information, marital status, parental status, sexual orientation, gender identity and expression, disability, or status as a veteran. Because Purdue is a federal government contractor, we must develop and maintain a written affirmative action program regarding our employment practices.

The university's written affirmative action\* plans are updated and published on an annual basis. Each year, Purdue publishes the Affirmative Action\* Plan for Minorities and Women as well as the Affirmative Action\* Plan for Veterans and Individuals with Disabilities. The Executive Vice Presidents, Vice Presidents, Vice Provosts, Deans, Directors, and Heads of units are responsible for promoting equal employment opportunity and for making good faith efforts to achieve equal employment opportunity.

Anyone seeking information regarding affirmative action\* in employment should consider reviewing the U.S. Department of Labor, Office of Federal Contract Compliance Program's website Anyone seeking information concerning Purdue's Affirmative Action\* Programs should contact the Office of the Vice President for Ethics and Compliance by telephone, 765-494-5830, or by email, compliance@purdue.edu. The Office of the Vice President for Ethics and Compliance is located on the 10th floor of Ernest C. Young Hall, 155 S. Grant Street, West Lafayette, Indiana.

The Purdue community includes students, faculty, and staff from so many different backgrounds. We will continue to create a welcoming and supportive environment for all.

Ever grateful, ever true,

Mung Chiang President

\* Purdue University's affirmative action program does not relate in any manner to the admission of students.

Hovde Hall, Room 200 610 Purdue Mall, West Lafayette, IN 47907-2040 Office: 765-494-9708



November 25, 2024

To All Members of the Purdue University Community:

The success of Purdue University's affirmative action program and policies of equal access and equal employment opportunity is dependent upon each of us. As Purdue's Equal Opportunity Officer, I have direct responsibility for ensuring that our equal access and equal opportunity employment policies are followed and the Affirmative Action Plans are implemented in good faith in accordance with the requirements of Executive Order 11246, as amended, the Rehabilitation Act of 1973, as amended, and 38 U.S.C. Section 4212, as well as the implementing regulations of each.

The University believes that adherence to its Affirmative Action Plans will enable our faculty, staff, and students to live and work in an inclusive environment. These Affirmative Action Plans cover policies and procedures necessary to make this happen, which include the following:

- ensuring that all employment decisions, including recruitment, hirings, terminations, promotions, and training, are made in accordance with federal and state laws, regulations and orders without regard to race, religion, color, sex, age, national origin or ancestry, genetic information, marital status, parental status, sexual orientation, gender identity and expression, disability, or status as a veteran;
- maintaining an environment where applicants and employees are not subject to
  discrimination, harassment, intimidation, threats, or coercion if they file a complaint, assist or
  participate in an investigation or any other activity related to the administration of these
  Plans, oppose any act or practice prohibited by the laws and regulations that govern these
  Plans, or exercise any other rights protected under the Plans' governing laws and regulations;
- educating employees and meeting regularly with supervisors and search committees regarding our equal access/equal employment opportunity and affirmative action policies; and
- distributing information about equal access/equal opportunity employment and affirmative action policies.

My department audits and monitors procedures, practices, and progress toward our goals and reports potential problems to me. The University will investigate circumstances of possible discrimination or harassment and will take appropriate action to correct any problems that may exist.

Thank you for your continued support of Purdue's quest for academic excellence and equitable treatment of all members of the Purdue community.

Very truly yours,

Alysa Christmas Rollock

Vice President for Ethics and Compliance

OFFICE OF THE VICE PRESIDENT FOR ETHICS AND COMPLIANCE

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Office: 765-494-5830 Fax: 765-496-1295 An Equal Access/Equal Opportunity University

## I. Introduction

## A. The General Purpose and Applicability of Purdue University's Affirmative Action Program 41 CFR 60-300.40: 41 CFR 60-741.40

Federal contractors like Purdue are required by federal law to develop a written affirmative action program for veterans and individuals with Disabilities. This program complies with Section 503 of the Rehabilitation Act of 1973 and the Vietnam Era Veterans' Readjustment Act of 1974 (38 USC 4212), as amended. A complete affirmative action program also includes mechanisms that enable the University to continually monitor and evaluate its employment practices to ensure that they are free from bias and discrimination based on race, religion, color, sex, age, national origin or ancestry, genetic information, marital status, parental status, sexual orientation, gender identity and expression, Disability, or status as a veteran.

This Affirmative Action Plan for Protected Veterans and Individuals with Disabilities is a working document that is prepared annually for reporting academic and staff personnel actions, and informing the West Lafayette campus of information relevant to the development, analysis, enforcement, evaluation, dissemination, and monitoring of the plan and its policies.

An affirmative action program is a management tool designed to ensure equal employment opportunity and to foster employment opportunities for Protected Veterans and Qualified Individuals with Disabilities.

This Affirmative Action Plan for Protected Veterans and Individuals with Disabilities applies to the operations of all colleges, schools, and departments managed on and affiliated with the West Lafayette campus, including organizational units and the central administration of the University. Purdue University in Indianapolis is an extension of the West Lafayette campus. Purdue also operates Purdue University Fort Wayne and Purdue University Northwest. PFW and each of Purdue University Northwest's campuses, Hammond and Westville, develop and maintain their own affirmative action programs with support from the West Lafayette Office of the Vice President for Ethics and Compliance.

#### B. Availability

41 CFR 60-300.41; 41 CFR 60-741.41

This plan is available for inspection Monday through Friday from 8:00 a.m. to 12:00 p.m. and 1:00 p.m. to 5:00 p.m. in the Office of the Vice President for Ethics and Compliance, Ernest C. Young Hall, 10<sup>th</sup> Floor, 155 S. Grant Street, West Lafayette, Indiana 47907.

The plan is also available on the website of the Office of the Vice President for Ethics and Compliance at the following address: Affirmative Action - Vice President for Ethics and Compliance - Purdue University.

Questions about Purdue's Affirmative Action Plan for Protected Veterans and Individuals with Disabilities or about affirmative action may be directed to the Associate Vice President for Compliance at 765-496-3158 (voice) or to <a href="mailto:compliance@purdue.edu">compliance@purdue.edu</a>.

#### C. Invitation to Self-Identify

41 CFR 60-300.42; 41 CFR 60-741.42

As part of Purdue University's affirmative action obligation, the University invites applicants for employment to state whether the applicant believes that s/he is an individual with a Disability and/or a Protected Veteran. After an offer of employment has been made, but before the individual begins working, Purdue again offers the opportunity to state whether the individual believes that s/he is an individual with a Disability and/or a Protected Veteran. Additionally, at five year intervals, the University invites employees to voluntarily inform Purdue whether the employee believes that s/he is an individual with a Disability. Purdue reminds employees that they may voluntarily update their Disability status at any time.

All information that Purdue University maintains on self-identification is kept confidential as required by federal regulations.

#### D. Definitions

All defined terms are capitalized throughout this Affirmative Action Plan for Protected Veterans and Individuals with Disabilities:

## **Active Duty Wartime or Campaign Badge Veteran**

Any 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.

#### **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 for which an Armed Forces service medal was awarded pursuant to Executive Order 12985.

#### Disability

(1) A physical or mental impairment that substantially limits one or more major life activities for such individual; (2) A record of such an impairment; or (3) Being regarded as having such an impairment.

This definition does not include individuals: (1) currently engaging in the illegal use of drugs when the University acts on the basis of such use; (2) whose current use of alcohol prevents them from performing the essential functions of the employment position or whose current alcohol abuse would constitute a direct threat to property or to the health or safety of the individual or others; or (3) who currently has a contagious disease or infection that prevents them from performing the essential functions of the employment position, or who, by reason of such disease or infection, would constitute a direct threat to the health or safety of the individual or others.

#### 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.

#### Discrimination

The process of illegally differentiating between people on the basis of group membership rather than on individual merit.

## **Equal Opportunity Employment**

A concept that proclaims the right of each person to apply and be evaluated for employment opportunities without regard to race, religion, color, sex, age, national origin or ancestry, genetic information, marital status, parental status, sexual orientation, gender identity and expression, Disability, or status as a veteran. It guarantees everyone the right to be considered solely on the basis of his/her ability to perform

the duties of the job in question, with or without Reasonable Accommodation(s).

## **Individual Discrimination**

When a person is subjected to unequal treatment on the basis of race, religion, color, sex, age, national origin or ancestry, genetic information, marital status, parental status, sexual orientation, gender identity and expression, Disability, or status as a veteran.

#### Qualified Individual with a Disability

A person 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(s), can perform the essential functions of such position.

#### **Protected Veteran**

This term includes a Disabled Veteran, a Recently Separated Veteran, an Active Duty Wartime or Campaign Badge Veteran, and Armed Forces Service Medal Veteran.

#### Reasonable Accommodation

A modification or adjustment to a job, the work environment, or the way a job is usually done that enables a Qualified Individual with a Disability to enjoy an Equal Employment Opportunity.

## **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, during the three-year period beginning on the date of such veteran's discharge or release from active duty.

#### **Systemic Discrimination**

Unequal treatment that results from "neutral" institutional practices that continue the effect of past Discrimination.

#### **Undue Hardship**

An action that requires significant difficulty or expense in relation to the size of the employer, the resources available, and the nature of the operation.

## II. Required Contents of Affirmative Action Program

## A. Equal Opportunity Policy Statement 41 CFR 60-300.44(a); 41 CFR 60-741.44(a)

At its meeting on January 21, 1970, the Board of Trustees reaffirmed and reinforced the University's general policy of equal opportunity by approving the following statement of policy and responsibility:

The University is committed to maintaining an inclusive community which recognizes and values the inherent worth and dignity of every person; fosters tolerance, sensitivity, understanding, and mutual respect among its members; and encourages each individual to strive to reach his or her own potential. In pursuit of its goal of academic excellence, the University seeks to develop and nurture diversity. The University believes that variety among its many members strengthens the institution, stimulates creativity, promotes the exchange of ideas, and enriches campus life.

Acts of Discrimination against any individual or group are wrong because they foster intolerance, incivility, and intimidation. The University does not condone and will not tolerate Discrimination, harassment or intimidation of any individual in the University community for any reason. The University, through its actions, seeks to assure all its members of their rights to protections from the harmful effects of Discrimination.

To meet its commitment under federal and state laws, the University also promulgates policies and programs to ensure that all persons have equal access to its educational programs, employment opportunities, facilities, and all other University activities without regard to race, religion, sex, color, national origin, ancestry, Disability, status as a Vietnam era veteran, or age. Additionally, the University promotes the full realization of equal employment opportunity through its affirmative action program.

The President of the University is charged with overall responsibility for nondiscrimination and equal opportunity.

Since that time, in furtherance of the University's equal employment opportunity and affirmative action obligations, the preceding policy has been implemented through a number of actions, including issuance of Purdue University's Nondiscrimination Policy Statement and the issuance of the Equal Opportunity, Equal Access and Affirmative Action Policy (III.C.2), most recently revised August 1, 2021. (See <a href="http://www.purdue.edu/purdue/ea\_eou\_statement.html">http://www.purdue.edu/purdue/ea\_eou\_statement.html</a> and <a href="http://www.purdue.edu/policies/ethics/iiic2.html">http://www.purdue.edu/policies/ethics/iiic2.html</a>.) The University prohibits Discrimination on the basis of race, religion, color, sex, age, national origin or ancestry, genetic information, marital status, parental status, sexual orientation, gender identity or gender expression, Disability or status as a veteran.

Ultimate responsibility for compliance with the applicable nondiscrimination and affirmative action laws and policies rests with the Board of Trustees and with the University's executive officers.

The University will recruit, hire, train, and promote persons in all job titles, and ensure that all personnel actions are administered without regard to Protected Veteran status or Disability and ensure that all employment decisions are based only on valid job requirements.

Employees and applicants for employment shall not be subjected to harassment, intimidation, threats, coercion or Discrimination because they have engaged in or may engage in any of the following activities:

- (1) Filing a complaint;
- (2) Assisting or participating in an investigation, compliance evaluation, hearing, or any other activity related to the administration of section 503 of the Rehabilitation Act of 1973, as

amended, or to the administration of the affirmative action provisions of VEVRAA, or any other Federal, State, or local law requiring equal opportunity for individuals with disabilities;

- (3) Opposing any act or practice made unlawful by section 503 of the Rehabilitation Act of 1973, as amended, or its implementing regulations regarding affirmative action, or VEVRAA or its implementing regulations regarding affirmative action or any other Federal, State of local law requiring equal opportunity for individuals with disabilities; or
- (4) Exercising any other right protected by section 503 of the Rehabilitation Act of 1973, as amended or its implementing regulations regarding affirmative action or by VEVRAA or its implementing regulations regarding affirmative action.

The University has designed and implemented an audit and reporting system that will (1) measure the effectiveness of the University's affirmative action program; (2) indicate any need for remedial action; (3) determine the degree to which the University's objective have been attained; (4) determine whether known individuals with disabilities have had the opportunity to participate in all University sponsored educational, training, recreational, and social activities; (5) measure the University's compliance with the affirmative action program's specific obligations; and (6) document the actions taken to comply with the obligations listed in this paragraph, and retain these documents as employment records subject to the recordkeeping requirements of 41 CFR 60-741.80.

Any employees with questions or concerns about any type of Discrimination are encouraged to bring these issues to the attention of the Office of Institutional Equity. The University has implemented Procedures for Resolving Complaints of Discrimination and Harassment. See <a href="http://www.purdue.edu/ethics/resources/resolving-complaints.html">http://www.purdue.edu/ethics/resources/resolving-complaints.html</a>.

#### B. Review of Personnel Practices

41 CFR 60-300.44(b); 41 CFR 60-741.44(b)

The University ensures that its personnel processes provide for careful, thorough, and systematic consideration of the job qualifications of applicants and employees with known disabilities or disabled Protected Veterans for job vacancies filled either by hiring or promotion, and for all training opportunities offered or available. In addition, the University ensures that applicants and employees with disabilities or disabled Protected Veterans have equal access to its personnel processes, including those implemented through information and communication technologies. The University makes such information and communication technologies accessible to individuals with disabilities and disabled Protected Veterans, even absent a specific request for Reasonable Accommodation.

The University provides any necessary Reasonable Accommodation to ensure applicants and employees with disabilities and disabled Protected Veterans receive equal opportunity in the operation of personnel processes. The University also ensures that its personnel processes do not stereotype individuals with disabilities or disabled Protected Veterans in a manner which limits their access to jobs for which they are qualified.

The University also periodically reviews its employment processes and makes any necessary modifications to ensure that these obligations are carried out.

#### **Selection Process**

The University ensures that all physical and/or mental job qualification requirements are reviewed when positions are submitted for review to insure that, to the extent qualification requirements tend to screen out Qualified Individuals with Disabilities, they are job-related and are consistent with business necessity and the safe performance of the job.

### Job Requirements and Descriptions

Deans and/or Department Heads create job descriptions for faculty positions. The Office of Institutional Equity reviews these descriptions whenever a position vacancy is being filled, or when circumstances dictate.

Compensation personnel within Human Resources create and maintain a job description bank that lists the requirements for every non-faculty position at the University. Compensation personnel review these descriptions whenever a position vacancy is being filled or when other circumstances dictate. In addition, reviews may be requested by a unit supervisor or by the Office of the Vice President for Ethics and Compliance.

#### Referral Procedures

For non-faculty job groups, Talent Acquisition personnel within Human Resources refer the credentials of qualified applicants to the hiring department. For faculty job groups, after a faculty position has been posted and/or advertised, the credentials of all applicants are referred to the Search and Screen Committee in the relevant academic department.

#### Pre-employment Inquiries

Both Sections 503 and 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act limit the use of pre-employment inquiries and medical examinations.

- Over the summer of 2022, the Office of Institutional Equity worked with the Office of the Provost to
  update the University's training and printed materials describing the faculty hiring process. The
  manual is called *Recruiting Excellent Faculty: A Practical Guide*. An update to the manual was
  published on the University's website in October 2023. The updated manual is provided to members
  of faculty Search and Screen Committees and provides education to the faculty regarding effective
  employment practices that promote and support Equal Employment Opportunity and affirmative
  action.
- The Office of the Vice President for Ethics and Compliance will continue to partner with the Office of the Provost to train faculty members to serve on Search and Screen Committees in the Recruiting Excellent Faculty workshop.
- Compensation personnel within Human Resources will continue to review position descriptions on a regular basis as positions become vacant and are filled, or as circumstances dictate.
- The University implemented the Job Family Structure on January 1, 2019. The Job Family Structure includes the Job Family, Sub-Family, Career Stream, Career Level, and Job Title. There are thirteen job families associated with staff and their specific sub-families, career streams, and levels.

## Recruitment

The Office of the Vice President for Human Resources is responsible for coordinating advertising activities designed to recruit Protected Veterans and Qualified Individuals with Disabilities. Employment opportunities are publicized in a variety of media, including on the University's Human Resources website.

Purdue University employment advertisements and brochures encourage Protected Veterans and Qualified Individuals with Disabilities to apply for employment opportunities and clearly indicate that accommodations and physical access will be ensured for everyone. University guidelines for effective recruitment include, but are not limited to, the following:

- Each employing unit must consider an applicant in terms of his/her ability to perform the essential elements of the job competently with or without Reasonable Accommodation(s).
- Individuals with Disabilities who cannot perform the essential functions of the job, with or without Reasonable Accommodation, are not qualified.

- Veterans and individuals with Disabilities who apply for positions are given the opportunity to request Reasonable Accommodation/alternative formats.
- Any determination of Disability shall be accorded the confidentiality of other medical data and shall
  not be used to exclude a Qualified Individual with a Disability.
- Human Resources should be consulted to assist in accommodations being considered by the employing unit that involve analyzing and restructuring jobs for qualified applicants with Disabilities.

## **Review of Sources**

The Office of Institutional Equity and Human Resources maintain lists of recruitment sources to assist departments in their recruitment efforts. Departments, however, should be familiar with the principal sources specific to their particular area of expertise.

- Talent Acquisition personnel within Human Resources have created a list of recruitment sources available to hiring supervisors.
- Job postings for open positions at the University can be accessed through WorkOne, the local unemployment office, as well as <a href="https://www.indianacareerconnect.com/">https://www.indianacareerconnect.com/</a>.
- The Office of Institutional Equity and Human Resources inform search committees and hiring supervisors of the availability of recruitment sources. A list of such resources is included in the Faculty Search and Screen Manual, which is produced and provided by the Office of Institutional Equity.
- The Director of Institutional Equity meets with individual search committees upon request to provide information on equal opportunity and affirmative action.

#### Education

All educational programs offered through the University are open to participation by Protected Veterans and individuals with Disabilities.

The Office of the Vice President for Ethics and Compliance and Human Resources maintain records showing the types of education offered through their units and attendance at those sessions.

## **Complaints and Grievances**

Faculty have access to the policy on Faculty Grievances (I.B.1). (See <a href="http://www.purdue.edu/policies/academic-research-affairs/ib1.html">http://www.purdue.edu/policies/academic-research-affairs/ib1.html</a>)

Staff have access to the policy on Dispute Resolution for Staff, Graduate Student Staff, Postdoctoral Researchers, Clinical Residents and Clinical Interns (VI.D.1). (See <a href="http://www.purdue.edu/policies/human-resources/vid1.html">http://www.purdue.edu/policies/human-resources/vid1.html</a>)

All employees may bring complaints of Discrimination and harassment in accordance with the policies on Equal Opportunity, Equal Access and Affirmative Action (III.C.2) <a href="http://www.purdue.edu/policies/ethics/iiic2.html">http://www.purdue.edu/policies/ethics/iiic2.html</a> and Anti-Harassment (III.C.1) <a href="http://www.purdue.edu/policies/ethics/iiic1.html">http://www.purdue.edu/policies/ethics/iiic1.html</a> and the Procedures for Resolving Complaints of Discrimination and Harassment (Revised) <a href="http://www.purdue.edu/ethics/resources/resolving-complaints.html">http://www.purdue.edu/ethics/resources/resolving-complaints.html</a>. The Vice President for Ethics and Compliance is responsible for overseeing and coordinating the enforcement of policies and procedures that deal with Discrimination and harassment for all campuses and operations in the University system. In these cases, the Office of Institutional Equity may participate in investigating and resolving the issue.

The Office of Institutional Equity monitors complaints or requests for assistance. In addition, it pursues any patterns or trends that suggest areas requiring remedial actions. For example, a disproportionately high number of complaints from a particular college, school, department, or unit may trigger a special inquiry by

the Office of Institutional Equity.

• The Office of the Vice President for Ethics and Compliance is the central office that receives singular or comprehensive information regarding complaints from University academic and non-academic areas.

## Monitoring of Position Specifications

#### Staff

Talent Acquisition personnel within Human Resources review all non-faculty position specifications for jobrelatedness and nondiscrimination on the basis of race, religion, color, sex, age, national origin or ancestry, genetic information, marital status, parental status, sexual orientation, gender identity and expression, Disability, or status as a veteran except where sex or age is a bona fide occupational qualification.

## **Faculty**

Each academic department is responsible for monitoring its respective faculty job specifications for jobrelatedness and nondiscrimination. The Office of Institutional Equity assists in this evaluation process.

## **Distribution of Position Announcements**

#### Staff

All job openings are listed at the following website: <a href="https://careers.purdue.edu/">https://careers.purdue.edu/</a>. Each advertisement and search plan is reviewed by a Talent Acquisition staff member to make certain that it includes mechanisms likely to reach protected class members. When efforts appear inadequate, the recruiter will speak with the hiring supervisor or search committee chair to urge additional and/or other strategies.

#### Faculty

The Office of Institutional Equity monitors each faculty position announcement for an adequate search and recruitment plan. The office also checks for compliance with Equal Employment Opportunity and affirmative action guidelines and disclaimers.

Faculty postings are also available at https://careers.purdue.edu/.

## **Selection Process**

#### Staff Test Validation

Tests used in the selection process are subject to review by the Office of the Vice President for Ethics and Compliance and Human Resources to assess validity and relevance.

#### **Selection Procedures**

Education, skills, and experience summaries have been established for the ranking and referral of applicants with administrative, technical, clerical, or service job interests. The summaries rely on job specification and a comparison of each eligible applicant's work experience, skills, and knowledge. The ranking systems used reflect the University's commitment to affirmative action by supporting the referral of Protected Veterans and Qualified Individuals with Disabilities.

#### **Education of Selection Personnel**

Unit managers, supervisors, and search committee members responsible for making hiring decisions are taught Equal Employment Opportunity requirements in open workshops offered by Human Resources and the Office of the Vice President for Ethics and Compliance. These include employee onboarding.

## Advertising

Advertisements are prepared by the respective college, school, or department. The Office of Institutional Equity monitors all faculty advertisements for the inclusion of the statement: **Purdue University is an EOE/AA employer.** All individuals, including minorities, women, individuals with disabilities, and veterans are encouraged to apply. "Human Resources and, when requested, the Office of Institutional Equity,

monitor the non-faculty advertisements for inclusion of this statement.

The phrase "an equal opportunity/equal access university" is used for advertising in publications pertaining to special events, programs, and activities.

#### **Publications**

Purdue University's Office of Marketing ensures that University publications contain the phrase "an equal opportunity/equal access university". It also confirms that where there are pictures of students, staff, faculty, or visitors there is a balanced representation of veterans and individuals with Disabilities.

## **Social and Recreational Opportunities**

For all University-sponsored social and recreational functions, the University offers equal opportunity to all employees without regard to veteran status or Disability.

Institutional facilities will continue to be provided for all employees on an equal basis. Where readily achievable, barriers have been removed to make buildings accessible to individuals with Disabilities.

#### **Career Counseling**

The Office of the Vice President for Ethics and Compliance will periodically monitor these activities to ensure that they are available to Protected Veterans and Qualified Individuals with Disabilities and to ensure that counseling sessions address informal lines of progress, upward mobility, and transfer opportunities, which enhance development for these employees.

### C. Physical and Mental Qualifications

41 CFR 60-300.44(c); 41 CFR 60-741.44(c)

#### **Faculty**

All faculty openings include a written description of the job duties and qualifications. All faculty job descriptions and advertisements are reviewed by the Office of Institutional Equity to ensure compliance with all civil rights laws concerning Equal Employment Opportunity.

#### Staff

All staff job descriptions are reviewed by staff in Talent Acquisition to ensure compliance with all civil rights laws concerning Equal Employment Opportunity.

In each case, to the extent that qualification standards tend to screen out Qualified Individuals with Disabilities or Disabled Veterans on the basis of Disability, the standards shall be related to the specific job or jobs for which the individual is being considered and consistent with business necessity. The University may consider whether an individual poses a direct threat to the health or safety of the individual or others on campus.

#### D. Reasonable Accommodation

41 CFR 60-300.44(d); 41 CFR 60-741.44(d)

Purdue University makes Reasonable Accommodations to the known physical and/or mental limitations of all otherwise Qualified Individuals with Disabilities and/or Disabled Veterans unless such accommodation would impose an Undue Hardship on the operation of the University. Purdue University does not deny employment opportunities to an otherwise qualified job applicant or employee with a Disability or Disabled Veteran based on the need of the University to make Reasonable Accommodation to such an individual's physical and/or mental impairments, and such Reasonable Accommodation obligation extends to the University's use of an online job application process.

As a matter of affirmative action, if an employee with a known Disability, or 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 University will confidentially notify the employee of the performance issue and inquire whether the employee is in need of a Reasonable Accommodation.

Human Resources works with faculty and staff to assess faculty and staff through the interactive process pursuant to the ADA and the ADA Amendments Act of 2008, and to determine the most appropriate Reasonable Accommodation(s) when applicable. Applicants and community members accessing University programs and services can seek Reasonable Accommodation assistance from Human Resources. Human Resources has the authority, resources, support, and access that is needed to ensure the effective implementation of the Reasonable Accommodation procedures.

Purdue University has developed and publicizes a written process for all employees to request a Reasonable Accommodation. Individuals who are employed at Purdue University, who believe they may be a person with a Disability and would like to request Reasonable Accommodation(s) are encouraged to complete the Reasonable Accommodation Request Form.

https://www.purdue.edu/hr/buspur/supportingDocs/Reasonable Accommodation Request Form.pdf. Upon completion of the form, employees are instructed to contact an evaluator within Human Resources to schedule a time to meet. Employees may call or email to request the meeting. Employees are instructed to provide the completed Reasonable Accommodation Request Form and the name(s), address(es), phone number(s), and fax number(s) for each health care provider to be contacted to verify the existence of a Disability. Individuals are asked to complete an authorization form during the meeting granting written permission to the evaluator to obtain medical documentation that is pertinent to the medical condition and the request for accommodation.

#### E. Harassment

41 CFR 60-300.44(e); 41 CFR 60-741.44(e)

Purdue University is committed to maintaining an environment that recognizes the inherent worth and dignity of every person; fosters tolerance, sensitivity, understanding and mutual respect; and encourages its members to strive to reach their potential. The most effective way to work toward preventing Harassment is through education that emphasizes respect for every individual.

It is essential that Purdue University demonstrate its intellectual and ethical leadership by reaffirming its strong position against harassment in all forms. All members of the University community must be able to pursue their goals, educational needs and working lives without intimidation or injury generated by intolerance and harassment.

Harassment in the workplace or the educational environment is unacceptable conduct and will not be tolerated. Purdue University is committed to maintaining an educational and work climate for faculty, staff and students that is positive and free from all forms of harassment. The entire policy may be found at <a href="http://www.purdue.edu/policies/ethics/iiic1.html">http://www.purdue.edu/policies/ethics/iiic1.html</a>.

The University has also adopted comprehensive Procedures for Resolving Complaints of Discrimination and Harassment. The Procedures are available at the following link: <a href="http://www.purdue.edu/ethics/resources/resolving-complaints.html">http://www.purdue.edu/ethics/resources/resolving-complaints.html</a>.

## F. External Dissemination of Policy, Outreach, and Positive Recruitment 41 CFR 60-300.44(f); 41 CFR 60-741.44(f)

## Advertisements and Notices

Each advertisement of a vacant position placed by a University employee must state in clear distinguishable type: "Purdue University is an EOE/AA employer. All individuals, including minorities, women, individuals with disabilities, and veterans are encouraged to apply."

Talent Acquisition personnel within Human Resources inform all recruiting sources verbally and in writing of the University's affirmative action policy and stipulates that these sources actively recruit and refer veterans and individuals with Disabilities for all positions listed.

Applicants are informed of the policy in materials included in the employment application process.

Procurement Services sends written notification of the policy, including the equal opportunity clause, to all covered federal sub-contractors, vendors, and suppliers doing business with the University.

The Capital Project Management staff within Physical Facilities includes the policy and equal opportunity clause into the general conditions of all contracts that are bid on for construction, rehabilitation, alteration, conversion, renovation, extension or repair of buildings, roadways, or other real property. When a contract is signed, those conditions are referenced in the contract text.

#### Other Methods

The Senior Director of Talent Acquisition communicates with organizations representing Protected Veterans and individuals with Disabilities, and community agencies and leaders about the Affirmative Action Plan for Protected Veterans and Individuals with Disabilities and the University policies regarding EOE/EA/AA.

Affirmative action information is distributed across campus using links available through the Office of the Vice President for Ethics and Compliance website: <a href="https://www.purdue.edu/ethics/">https://www.purdue.edu/ethics/</a>.

University and University-related publications and websites periodically include articles and stories on employees who are veterans and employees with Disabilities, as well as activities related to the affirmative action program.

The University undertakes appropriate outreach and positive recruitment activities reasonably designed to effectively recruit qualified individuals with disabilities.

#### G. Internal Dissemination of Policy

41 CFR 60-300.44(g); 41 CFR 60-741.44(g)

#### **Published Documents and Postings**

The University annually communicates to all employees its policy on Equal Access, Equal Opportunity, and Affirmative Action (III.C.2), a copy of which is provided for each new employee as part of the packet of introductory information. (See <a href="http://www.purdue.edu/policies/ethics/iiic2.html">http://www.purdue.edu/policies/ethics/iiic2.html</a>)

The EOE/EA/AA policy is included in the Faculty and Staff Handbook, an employee policies and procedures manual (see <a href="http://www.purdue.edu/faculty\_staff\_handbook/">http://www.purdue.edu/faculty\_staff\_handbook/</a>) and on the University Policy Office website: <a href="https://www.purdue.edu/policies/">https://www.purdue.edu/policies/</a>.

Equal Employment Opportunity posters and other required notices are displayed in locations where employment interviews are routinely conducted and on public bulletin boards in every campus building where employees work.

## **Programs and Presentations**

The President, the Provost, and senior executive staff continue to periodically emphasize this policy in meetings with top administrators, Deans, Department Heads, Directors, and heads of divisions, offices, and other faculty and staff advisory groups.

The Office of Institutional Equity and/or Human Resources informs unit heads of their EOE/EA/AA responsibilities at the beginning of the faculty and staff selection process. Thereafter, the heads of the hiring units inform each hiring committee of its EOE/EA/AA responsibilities at the beginning of each search.

The Recruiting Excellent Faculty: A Practical Guide manual contains information on Equal Employment Opportunity and affirmative action regulations, policies, and procedures. In addition, the manual has specific sections that set forth various guidelines and advice regarding interviewing applicants with Disabilities for employment.

This Affirmative Action Plan for Protected Veterans and Individuals with Disabilities is distributed, reviewed, and discussed annually with appropriate administrators at the University and posted on the website of the Office of the Vice President for Ethics and Compliance.

Purdue University's Office of Marketing staff ensures that veterans and individuals with Disabilities are represented in advertising and promotional materials.

The University publishes articles covering Equal Employment Opportunity programs and the achievements of veterans and individuals with Disabilities who are faculty, staff, and students in University publications and on the University's websites.

## H. Audit and Reporting System

41 CFR 60-300.44(h); 41 CFR 60-741.44(h)

Purdue has designed and implemented an audit and reporting system that measures the effectiveness of the University's affirmative action program. Additionally, the review system indicates the need for remedial action, if any, and measures whether the University's objectives are being met. Purdue will determine whether individuals with known Disabilities and Protected Veterans have the opportunity to participate in all University sponsored educational, training, recreational, and social activities to the same extent as other non-identifying employees. Purdue's plan also measures compliance with the affirmative action program's specific obligations. Purdue maintains documentation of its efforts to comply with the obligations listed above. The documentation is retained as employment records.

When any part of the University's affirmative action program is identified as being deficient, Purdue will undertake appropriate action to bring the University into compliance.

#### I. Responsibility for Implementation

41 CFR 60-300.44(i); 41 CFR 60-741.44(i)

Ultimate responsibility for compliance with the applicable nondiscrimination and affirmative action laws and policies rests with the Board of Trustees and with the University's executive officers.

#### **Board of Trustees**

The University is governed by a 10-member Board of Trustees appointed by the Governor of the State of Indiana. Its charge includes selecting the President of the University, deciding major policy lines, approving the financial program and budget, approving the President's nominations for major appointments, and approving all construction and major contracts. The members of the Board of Trustees are as follows: Lawrence "Sonny" Beck; Michael R. Berghoff (Chairman); Kevin D. Boes (student trustee); JoAnn Brouillette; Theresa Carter; Vanessa J. Castagna; Malcolm DeKryger; Michael F. Klipsch; Gary J. Lehman (Vice Chairman); and Shawn A. Taylor.

## Executive Staff, Line Management, and Supervisors

Mung Chiang, President of the University, assumes full responsibility for the successful implementation of the University's equal opportunity policy and the Affirmative Action Plan for the West Lafayette campus.

Alysa Christmas Rollock, Vice President for Ethics and Compliance, is the University's Equal Opportunity Officer and provides general oversight and leadership for the University's overall compliance efforts for faculty, staff, and students, including compliance with Title VI of the Civil Rights Act of 1964; Title VII of the Civil Rights Act of 1964, as amended; Title IX of the Education Amendments of 1972; Sections 503 and

504 of the Rehabilitation Act of 1973; the Age Discrimination in Employment Act of 1967; Executive Order 11246, as amended; the Americans with Disabilities Act of 1990; the ADA Amendments Act of 2008; the Genetic Information Nondiscrimination Act of 2008; Executive Order 13672; and the state civil rights statutes.

Deborah B. Trice, Associate Vice President for Compliance & Senior Associate Counsel, Regulatory Matters, is the University's Affirmative Action Officer, reporting directly to the Vice President for Ethics and Compliance, and is responsible for developing, coordinating, and maintaining an annual Affirmative Action Plan for Minorities and Women and a separate Affirmative Action Plan for Veterans and Individuals with Disabilities for the West Lafayette campus. The staff of the Office of the Vice President for Ethics and Compliance assists the AVP with implementing and monitoring the Affirmative Action Plan.

The Executive Vice Presidents, Vice Presidents, Chancellors, and Deans are responsible integrating equal opportunity and affirmative action principles and objectives into all employment-related decisions within their areas of responsibility. The Executive Vice Presidents, Vice Presidents, Chancellors, and Deans (or their designees) are also responsible for reviewing recommendations for hiring, compensation, promotion, transfer or reassignment, and termination to ensure compliance with the University's affirmative action program in both procedure and outcome, and for reviewing the qualifications of applicants and reasons for selection to ensure that minorities, women, veterans, and persons with Disabilities are given full opportunities for hire and promotion.

Directors, Department and Unit Heads, and supervisors at each campus are responsible for promoting Equal Employment Opportunity and making good faith efforts to achieve affirmative action goals.

#### J. Training

41 CFR 60-300.44(j); 41 CFR 60-741.44(j)

Purdue University developed an updated onboarding program for all new employees. Purdue trains all new employees regarding the University's Nondiscrimination Policy Statement, and emphasizes that Purdue is committed to equal access and equal opportunity for all members of the University community in both an academic and employment context, including in admissions, financial aid, recruiting, selecting, promoting, and disciplining, etc.

Additionally, training on the University's commitment to affirmative action and equal employment opportunity is provided to graduate students each year before the fall semester begins.

The Associate Vice President of Institutional Equity participates in training for faculty members who serve on Faculty Search and Screen Committees to discuss the University's affirmative action program as well as the University's commitment to Equal Opportunity Employment and also meets with search committees by invitation.

## K. Data Collection and Analysis

41 CFR 60-300.44(k); 41 CFR 60-741.44(k)

#### **Protected Veterans**

Purdue has elected to adopt the current 5.2% hiring benchmark goal for Protected Veterans as established by the Office of Federal Contract Compliance Programs (OFCCP) rather than calculating our own percentage goal. OFCCP's 5.2% benchmark goal is not a quota that Purdue must meet, nor is it intended to represent a floor or ceiling for the University's recruitment of qualified Protected Veterans.

Purdue shall document the following computations or comparisons pertaining to applicants and hires on an annual basis and maintain them for a period of three (3) years:

- 1. The number of applicants who self-identified as Protected Veterans or who are otherwise known as Protected Veterans;
- 2. The total number of job openings and total number of jobs filled;
- 3. The total number of applicants for all jobs;
- 4. The number of Protected Veteran applicants hired; and
- 5. The total number of applicants hired.

Benchmarks for Protected Veteran Hiring			
Applicants	Total	%	
Total # Protected Veteran Applicants	564	1.32%	
Total Applicants	42846		
Total Jobs Filled	3408		
Total Job Openings	3795		
Offers and Hires			
Total # Protected Veterans Offered	63	0.92%	
Total # Protected Veterans Hired	53	0.78%	
Total Employees Hired	6830		
Workforce			
Total # Protected Veteran Employees	172	1.46%	
Total Employees	11804		

## Individuals with Disabilities

41 CFR 60-741.45

Purdue maintains data regarding the recruitment and hiring of individuals who self-identify as individuals with Disabilities. Purdue uses this data to evaluate the representation of individuals with Disabilities in the University's workforce on the West Lafayette campus. These figures are not a quota that Purdue must meet nor are these figures intended to represent a floor or ceiling for the employment of Qualified Individuals with Disabilities on Purdue's West Lafayette campus. Purdue assesses its efforts to attain OFCCP's 7.0% utilization goal for the recruitment of individuals with Disabilities on an annual basis.

Purdue shall document the following computations or comparisons pertaining to applicants and hires on an annual basis and maintain them for a period of three (3) years:

- 1. The number of applicants who self-identified as individuals with Disabilities or who are otherwise known to be individuals with Disabilities;
- 2. The total number of job openings and total number of jobs filled;
- 3. The total number of applicants for all jobs;
- 4. The number of applicants with Disabilities hired; and
- 5. The total number of applicants hired.

Utilization Analysis for 503 AAP			
Applicants	Total	%	
Total # Individuals with Disability Applicants	4227	9.87%	
Total Applicants	42846		
Total Jobs Filled	3408		
Total Job Openings	3795		
Offers and Hires			
Total # Individuals with Disabilities Offered	562	7.70%	
Total # Individuals with Disabilities Hired	508	7.44%	
Total Employees Hired	6830		
Workforce			
Total # Individuals with Disabilities Employees	883	7.48%	
Total Employees	11804		

# L. Annual "Effectiveness Self-Assessment" of Outreach and Recruitment Efforts for Protected Veterans 41 CFR 60-300.44(f)(3); .41; and .44(k)

Purdue evaluates the totality of its outreach and recruitment efforts over the prior twelve months based on the following criteria:

- 1. Did the activity attract qualified applicants with protected veteran status?
- 2. Did the activity result in the hiring of qualified individuals with protected status?
- 3. Did the activity expand Purdue's outreach to individuals with protected status in the community?
- 4. Did the activity increase Purdue's ability to include individuals with protected veteran status in its workforce?
- 5. What impact did the University's efforts have on the overall number of applicants and job offers identified as protected veterans as calculated pursuant to 61 CFR 60.300.44(k)?

# M. Annual "Effectiveness Self-Assessment" of Outreach and Recruitment Efforts for Individuals with a Disability

41 CFR 6060-741.44(f)(3); .41; and .44(k)

The University evaluates the totality of its outreach and recruitment efforts over the prior twelve months based on the following criteria:

- 1. Did the activity attract qualified applicants with disabilities?
- 2. Did the activity result in the hiring of qualified individuals with disabilities?
- 3. Did the activity expand the University's outreach to individuals with disabilities in the community?
- 4. Did the activity increase Purdue's ability to include individuals with disabilities in its workforce?
- 5. What impact did the University's efforts have on the overall number of applicants and job offers identified as individuals with disabilities as calculated pursuant to 61 CFR 60.741.44(k)?

## **Special Initiatives**

family member.

#### The Dorothy Stratton Veteran and Military Success Center

In 2012, Purdue's Veterans Success Center opened. The purpose of the center is to provide a central portal to the numerous benefits, programming, and services available to Purdue's military veteran students.

In October, 2023, the Purdue Board of Trustees approved the renaming of the Veterans Success Center to the Dorothy Stratton Veteran and Military Success Center. The University issued the following press release to explain the action:

Dorothy Stratton's legacy and leadership to Purdue University and the nation will be recognized with the renaming of the <u>Veterans Success Center</u> on the West Lafayette campus to the Dorothy Stratton Veteran and Military Success Center. Purdue trustees approved the renaming Friday (Oct. 6). In addition to honoring <u>Stratton</u>, the center's name now includes the word "Military" to reflect a more inclusive space, as veterans represent the smallest percentage in Purdue's overall military-connected student population. The center's largest population is family members using benefits that are transferred from a veteran

Stratton became the first full-time dean of women at Purdue in 1933 and served in that role until 1942, when she was commissioned a senior lieutenant in the U.S. Navy. Later in 1942, she was transferred to the U.S. Coast Guard, where she became the creator and first director of its Women's Reserve in World War II. Upon being named director, she was promoted to lieutenant commander and then to commander in January 1944 and to captain one month later.

The nautical title SPAR, as the Women's Reserve was commonly known, was originated by Stratton. She coined the acronym from the first letters of the Coast Guard's famous fighting motto, "Semper paratus," and its English translation, "Always ready."

Upon her retirement in 1946, Stratton was awarded the Legion of Merit medal for her contributions to women in the military.

From 1947-50, Stratton was director of personnel at the International Monetary Fund, and she was national executive director of the Girl Scouts of the United States of America from 1950-60.

During her tenure at Purdue, Stratton saw the enrollment of women students increase from 500 to more than 1,400, and three modern residence halls for women constructed. A liberal science program for women in the School of Science was inaugurated, and an employment placement center for Purdue women was instituted. She was instrumental in establishing the Housemother Training School, which gave intensive training to several hundred fraternity and sorority housemothers from all parts of the country.

The Veteran and Military Success Center provides holistic programming and services for Purdue's military-connected students who are veterans, current service members or family members. Currently more than 1,700 military-connected students using service-connected education benefits are served by the center.

Stratton died in 2006 at age 107.

## The Military Family Research Institute

Through research and outreach, the Military Family Research Institute (MFRI) works closely with collaborators to improve the lives of service members and their families in Indiana and across the country. More than 2 million military service members have been deployed since Sept. 11, 2001, many serving multiple tours in combat zones thousands of miles from home. Their families serve too, managing challenges and opportunities unique to the military lifestyle. At MFRI, we work every day as a "force multiplier" for the support of military families in and beyond Indiana. Our efforts and leadership are helping to enhance our state's reputation in military circles, and have caused us to be sought out by local, state and national decision makers for advice and collaboration. MFRI is part of the Department of Human Development and Family Studies, within the College of Health and Human Sciences at Purdue University.

MFRI grew out of efforts to support and sustain families. In 1993, Purdue's Center for Families was established to help improve the quality of life for families. After seven years of working on behalf of families, the Center created MFRI with funding from the Department of Defense (DoD). The original mission was almost entirely research-based. With funding from Lilly Endowment Inc., the DoD, Sesame Workshop and other partners, MFRI's mission was expanded to include outreach and programming.

- The Military Family Research Institute, with the support of Lilly Endowment Inc., launched Operation Diploma with the goal of helping institutions and student veteran organizations implement policies and programs that assist student service members and veterans as they transition from combat to the classroom. Operation Diploma includes awarding grants to institutions of higher education to develop support programs and services for student service members and veterans. MFRI has an explicit hiring preference for military members, veterans, or family members. Approximately one-third of MFRI staff are connected to the military.
- MFRI provides mentoring to student veteran organizations on our campus and at other universities, and holds organization plan competitions every semester in order to award small grants to support the activities of the organizations and the academic success of their members.

## **Battlemind to Home Mental Health Summit**

The annual Battlemind to Home Mental Health Summit took place on October 23-24, 2023. The MFRI presented the summit with several other sponsors: Department of Veterans Affairs Center for Faith-Based and Neighborhood Partnerships, Indiana Department of Veterans Affairs, Indiana National Guard, Indiana State Bar Association, and Roudebush VA Medical Center.

Battlemind brings together a variety of experts each year to inform and educate Indiana professionals on the critical issues facing military-connected families in Indiana's communities. The goal for this conference is to help reduce reintegration barriers for veterans, service members and military families. We work to educate attendees on the challenges military-connected families face, and also the opportunities and strengths they bring to our communities.

Throughout the event, attendees can virtually network within and across communities, learn about shared issues, and develop action plans to apply at home. They will leave Battlemind empowered and motivated to create community change.

## Other Initiatives and Events

- Each November, the Office of the Vice President for Ethics and Compliance recognizes all new employees who have self-identified as veterans with a Purdue Veterans Challenge Coin.
- The Office of Institutional Equity organizes and is the lead host of the reception at which the Focus Awards are presented. Focus Awards are given annually during March, Disability Awareness Month in Indiana, to individuals affiliated with Purdue University who have made an outstanding contribution to

the furthering of the University's commitment to Disability accessibility and diversity.

- Each March, the Office of Institutional Equity offers various educational sessions and workshops to mark Disability Awareness Month in Indiana and highlight the University's commitment to equal access for people with Disabilities.
- The Office of Institutional Equity has jointly worked with the Disability Resource Center and Human Resources to conduct educational outreach activities on issues of Disabilities that affect both students and employees.
- The ADA People and Technology (ADAPT) committee consists of representatives from different offices
  on campus. It meets monthly to discuss accessibility and accommodation issues on campus and to
  develop action plans to address these issues.
- On an on-going basis, Physical Facilities reviews building construction and remodeling plans to ensure facilities on campus are accessible.
- The Assistive Technology Center provides ongoing technical support assistive hearing systems, which
  provide increased accessibility of classes, programs, and services to Purdue students, staff, and
  faculty.
- Each November, memorial services to honor veterans are sponsored by the Purdue Student Union Board and Purdue University ROTC. The Veterans Day Tribute includes invited speakers, musical performances, Table of Remembrance, Taps, and a reception.
- Each November, Purdue sponsors a University-wide annual recognition program to individually honor and recognize current Purdue employee veterans in coordination with other Veterans Day events.
- Purdue University's Extension Service offers Military Teen Adventure Camps, a series of exciting and high energy camps across the United States that are open to military teens ages 14-18.



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