

**AFFIRMATIVE ACTION PROGRAM  
FOR**

**WOMEN, MINORITIES, VETERANS AND INDIVIDUALS WITH DISABILITIES**

**Cleveland State University**

Cleveland, OH

# AFFIRMATIVE ACTION PROGRAM

**Contractor :** Cleveland State University  
Cleveland, OH

**EEO Coordinator :** Yulanda McCarty-Harris, J.D.  
Director, Office for Institutional Equity

## INTRODUCTION

Cleveland State University is committed to equal opportunity through affirmative action as it is prescribed under Federal regulations and University policy. The University is committed to building an inclusive community that recognizes the inherent worth and dignity of every person; fosters tolerance, sensitivity and mutual respect among its members; and encourages each individual to strive to reach his or her own potential. To this end, the university embraces human diversity and is committed to equal access, equal opportunity, affirmative action, and eliminating discrimination. This commitment is both a moral imperative consistent with an intellectual community that celebrates individual differences and diversity, as well as a matter of law. The university administration, faculty, staff, students, and volunteers are responsible for assuring that the university maintains an environment for work, study and participation in university programs, services and activities free from discrimination or harassment. Discrimination and harassment in the workplace or the educational environment is unacceptable conduct and shall not be tolerated. The university is committed to maintaining an educational and work climate for faculty, staff and students that is positive and free from all forms of discrimination and harassment.

The University develops an annual affirmative action program as one of several tools to implement the affirmative action policies effectively. The form, language and analysis of the program necessarily complies with the requirements of 41 CFR 60-2, et seq. (affirmative action programs) and other regulations established pursuant to the provisions of Executive Order 11246 and all other civil rights related laws and regulations that have or may be enacted, as amended.

Please note that information regarding identifiable individuals is private and confidentially maintained. Everyone who has official access to confidential data will exercise every precaution to protect this information.

## **DESIGNATION OF RESPONSIBILITY**

### **41 CFR Section 60-2.17(a), 60-2.10(b)(2)(i)**

Ronald M. Berkman, President, has overall responsibility for implementation of the Equal Employment Opportunity Policy. Yulanda McCarty-Harris, J.D., Equal Employment Opportunity Coordinator, assumes the responsibility for the development, implementation and monitoring of the affirmative action program, which includes all those positions located in subordinate and/or lower-level establishments for which the selection decisions are made at the corporate level.

Responsibility for the implementation and monitoring of the affirmative action program rests with the EEO Coordinator, whose responsibilities include but are not limited to the following:

1. Developing policy statements and affirmative action programs.
2. Developing internal and external communication procedures when appropriate.
3. Developing an internal audit and reporting system that:
  - a. Identifies areas that require remedial action, and develops programs to correct those problem areas.
  - b. Determines the degree to which the goals and objectives are reached.
4. Monitoring the following internal practices:
  - a. Proper display of EEO posters and policies.
  - b. Full participation of minority, female, and disabled employees in all Cleveland State University sponsored educational, training, recreational, and social activities.
5. Assisting management in solving any identified problems. It is the responsibility of department heads, managers, and supervisors to provide the EEO Coordinator with such information and/or statistical data as is necessary to measure progress toward the attainment of goals and to assure good faith efforts to implement the affirmative action program. Such information and/or statistical data are used to set reasonable placement goals.
6. Keeping management informed of the latest developments in the equal employment opportunity area.
7. Assisting employees in solving problems and resolving EEO complaints.
8. Serving as a liaison between Cleveland State University and appropriate women and minority groups.
9. Serving as a liaison between Cleveland State University and appropriate EEO enforcement agencies.

## **ORGANIZATIONAL PROFILE**

### **41 CFR Section 60-2.11**

The organizational profile depicts staffing patterns within Cleveland State University that assist in identifying organizational units where women or minorities may be underrepresented or concentrated. It is one method used to identify potential barriers to equal employment opportunity.

Cleveland State University determines annually whether to include the Organizational Display or the Workforce Analysis as its Organizational Profile as part of producing the yearly affirmative action program.

#### **Organizational Display**

The Organizational Display is a detailed presentation of the Cleveland State University organizational structure. It identifies each organizational unit and shows the relationship to other organizational units.

An organizational unit is any component part of the Cleveland State University corporate structure. It might be a department, division, section, branch, group, project team, job family, or similar component. This includes an umbrella unit (such as a department) that contains a number of subordinate units, and it separately includes each of the subordinate units (such as sections or branches).

For each organizational unit, the organizational display includes the following:

1. The name of the unit;
2. The job title, gender, race, and ethnicity of the unit supervisor(s) (if the unit has a supervisor);
3. The total number of male and female incumbents; and
4. The total number of male and female incumbents in each of the separate minority groups.

#### **Workforce Analysis**

The Workforce Analysis is a listing of each job title, as it appears in applicable collective bargaining agreements or payroll records, ranked from the lowest paid to the highest paid within each department or other similar organizational unit including departmental or unit supervision.

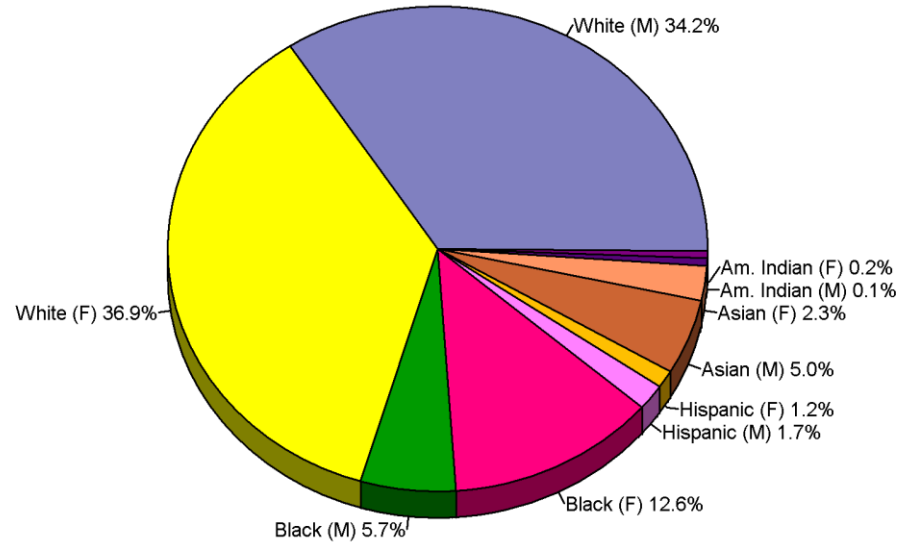
Where there are separate work units or lines of progression within a department, a separate Line of Progression Report is provided for each such work unit or line, including unit supervisors. The order of the jobs in the line through which an employee could move to the top of the line is indicated on the report.

Where there are no formal progression lines or usual promotional sequences, job titles are listed in order of wage rates or salary ranges by departments, job families or disciplines.

The total number of incumbents in each minority classification is given for each job title. All job titles, including all managerial job titles, are listed.

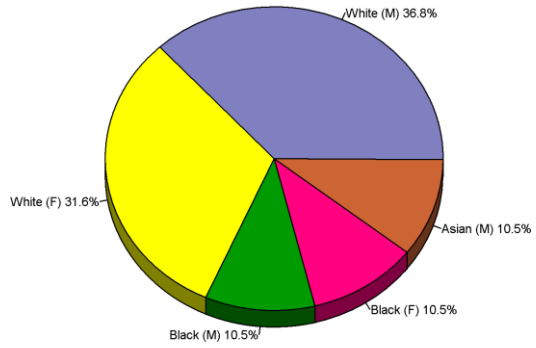
# Cleveland State University

## Companywide

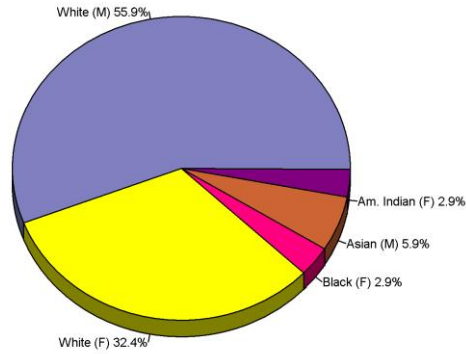


# Cleveland State University

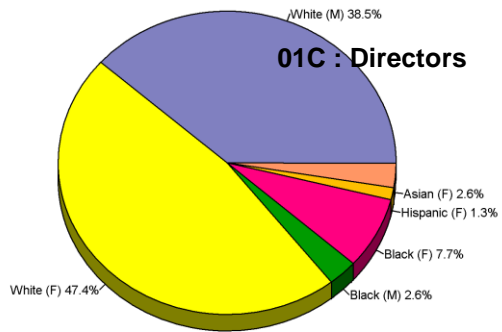
**01A : Executives**



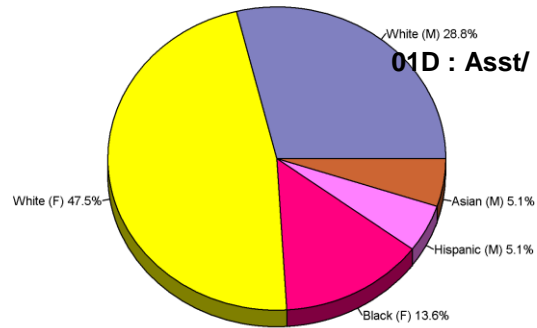
**01B : AVPs**



**01C : Directors**

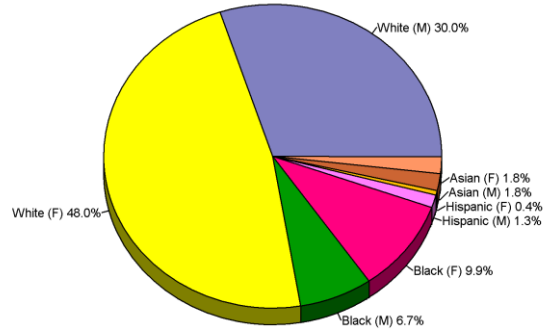


**01D : Asst/ Assoc. Directors**

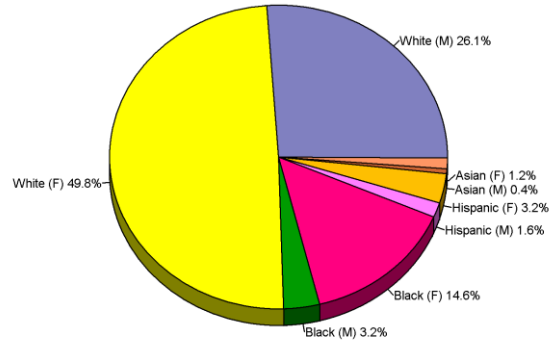


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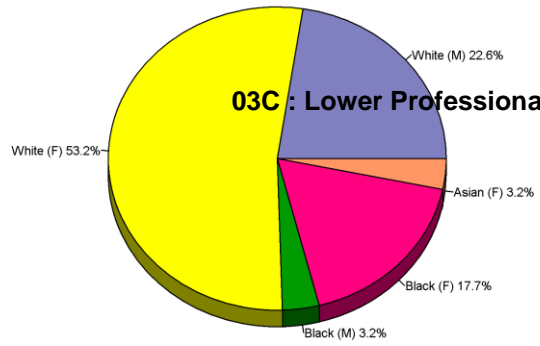
**03A : Upper Professional**



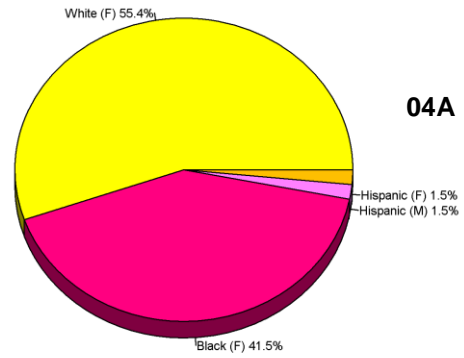
**03B : Middle Professional**



**03C : Lower Professional**



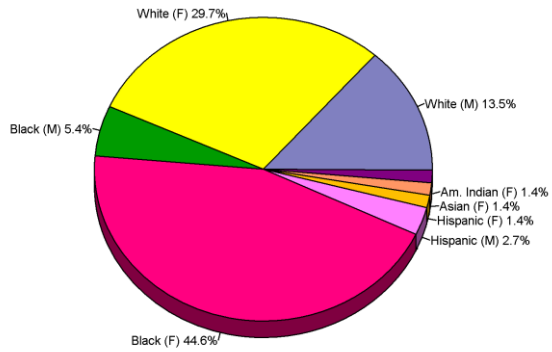
**04A : Upper Clerical**



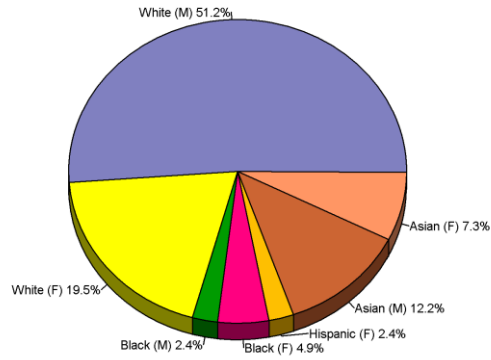


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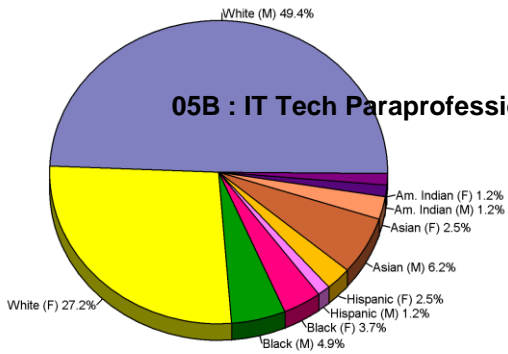
**04B : Lower Clerical**



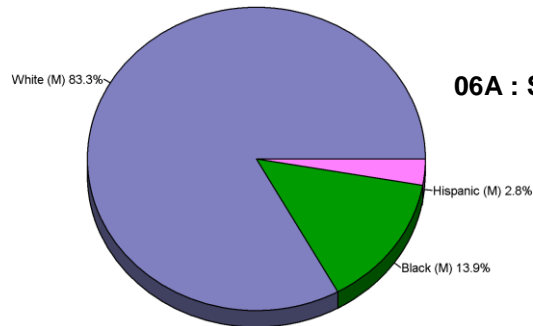
**05A : Tech Paraprofessional - Misc.**



**05B : IT Tech Paraprofessionals**

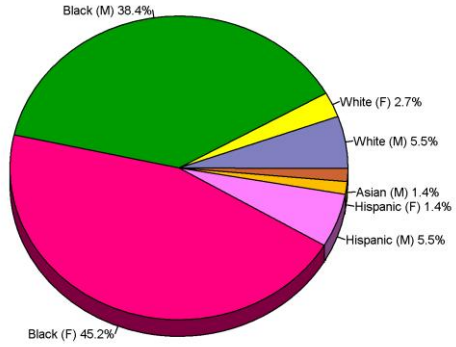


**06A : Skilled Craft**

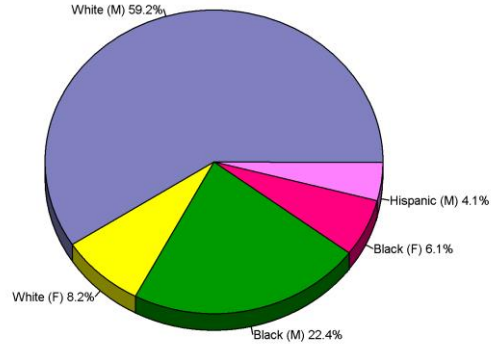


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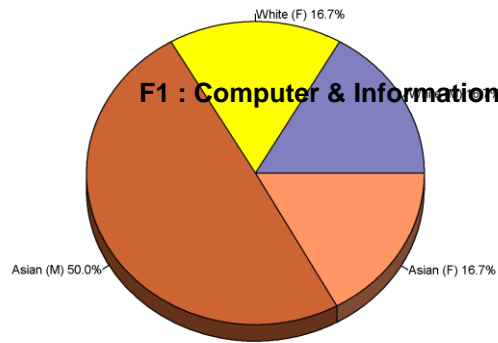
**07A : Misc. Service**



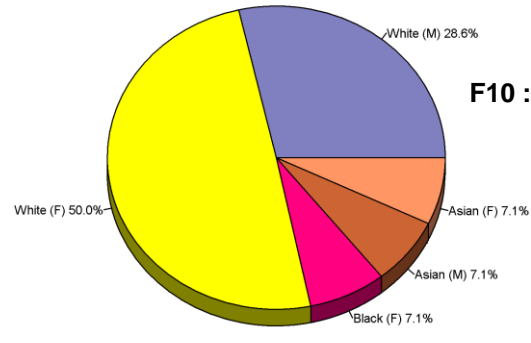
**07B : Service Protective**



**F1 : Computer & Information Science**

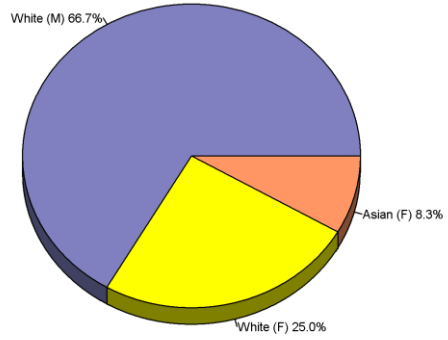


**F10 : Sociology**

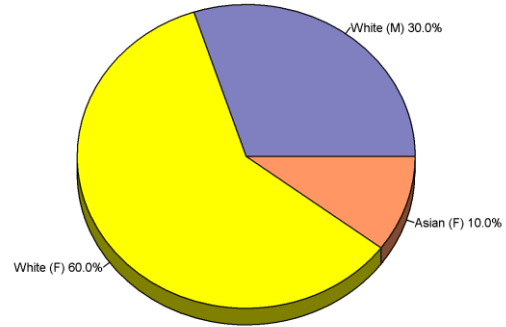


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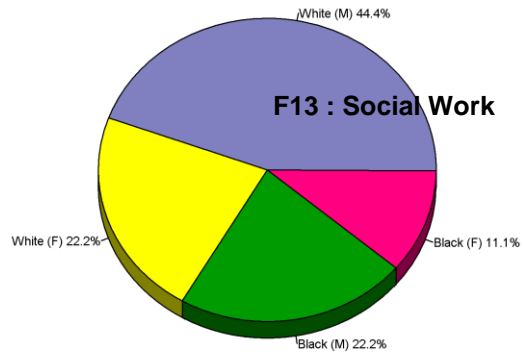
## F11 : Music



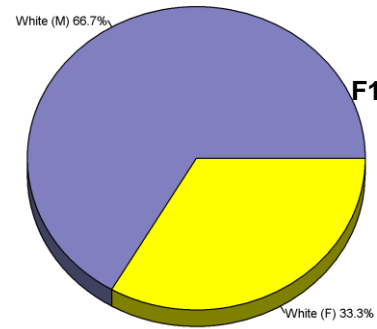
## F12 : Art



## F13 : Social Work

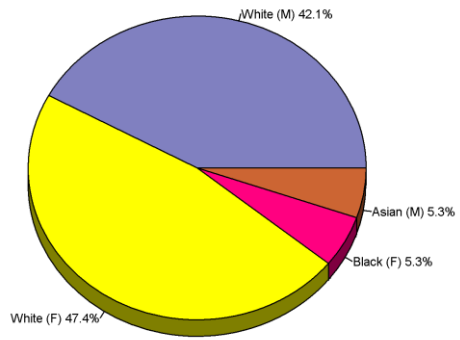


## F15 : Theatre & Dance

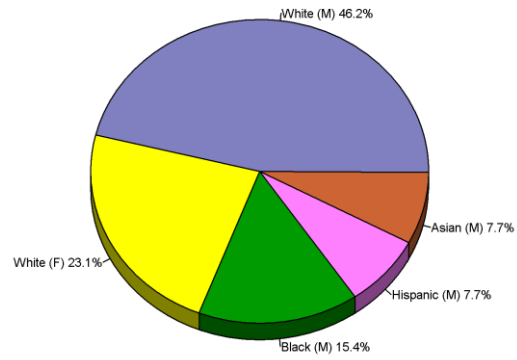


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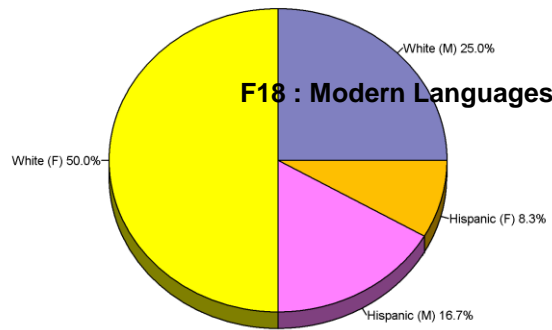
## F16 : English



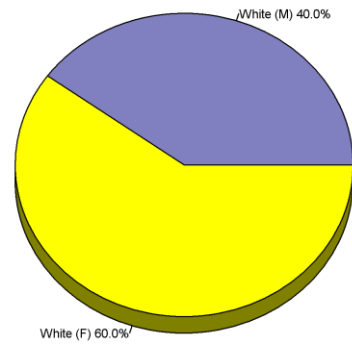
## F17 : History



## F18 : Modern Languages

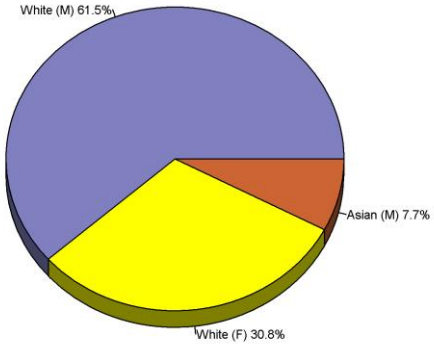


## F19 : Anthropology

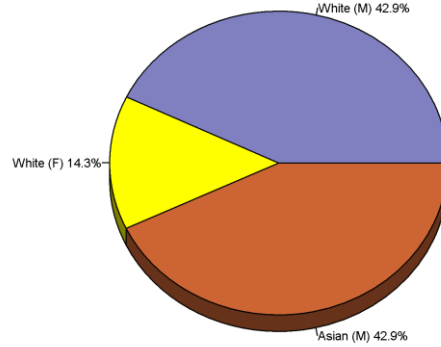


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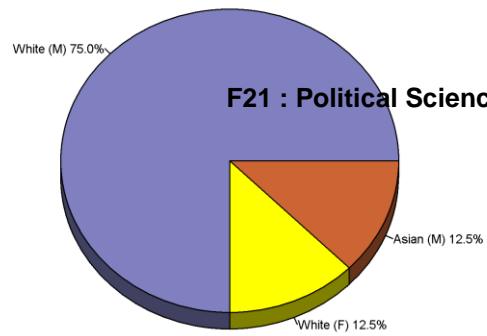
## F2 : Management & Labor



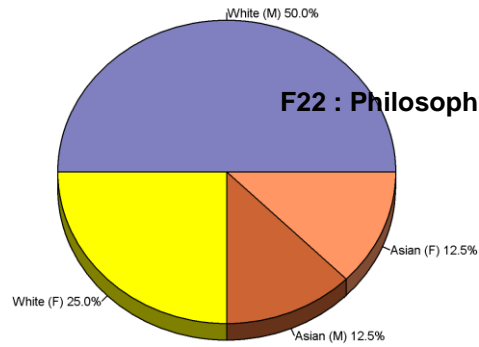
## F20 : Economics



## F21 : Political Science

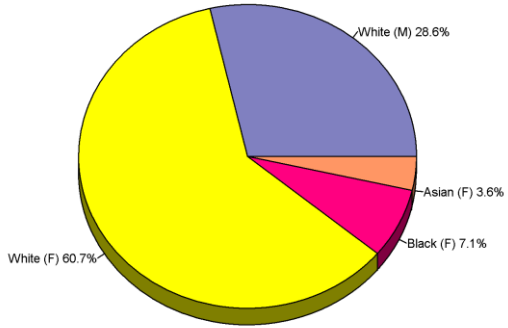


## F22 : Philosophy & Comparative Religion

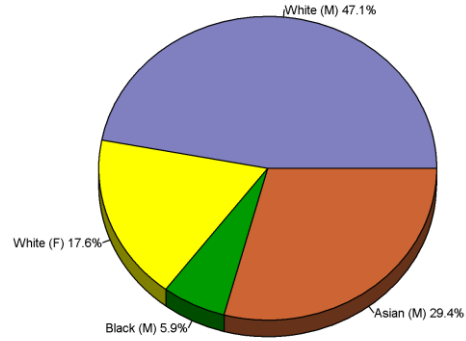


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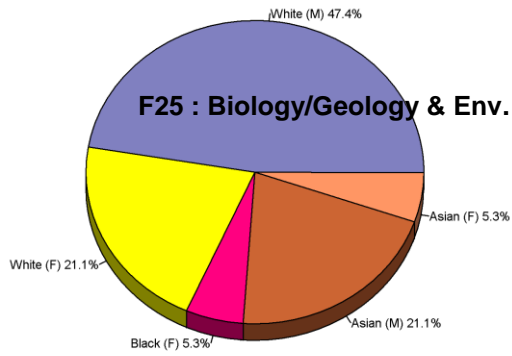
## F23 : Health Sciences



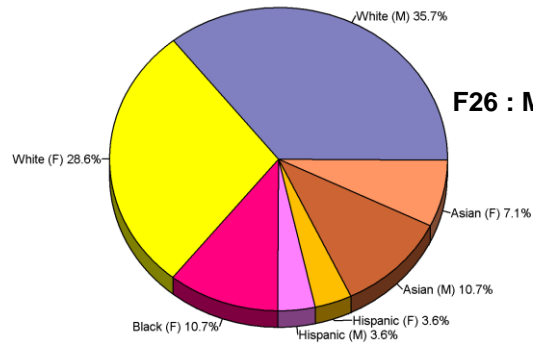
## F24 : Chemistry



## F25 : Biology/Geology & Env. Science

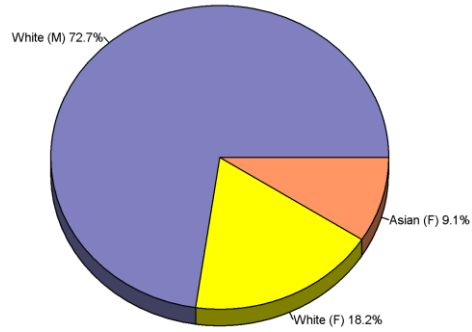


## F26 : Mathematics

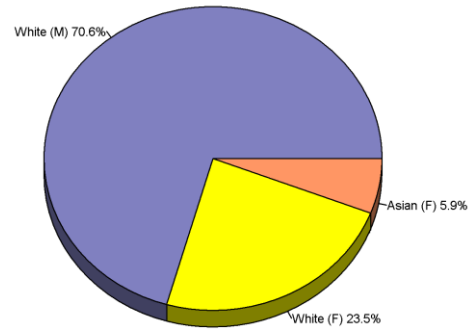


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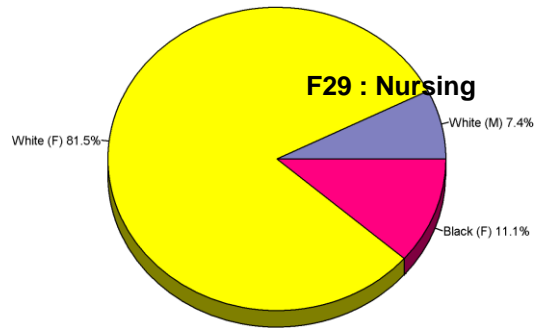
## F27 : Physics



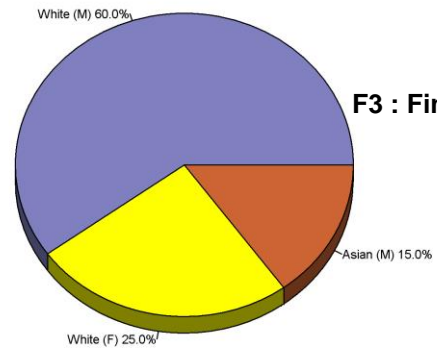
## F28 : Psychology



## F29 : Nursing

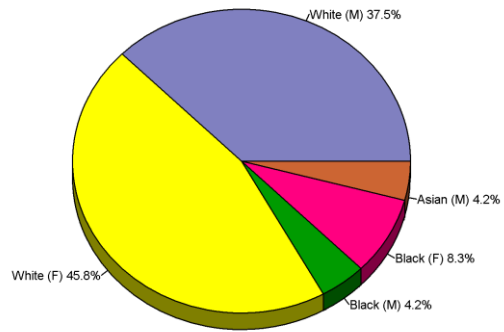


## F3 : Finance & Accounting

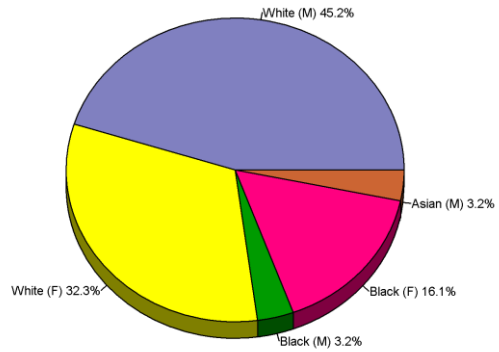


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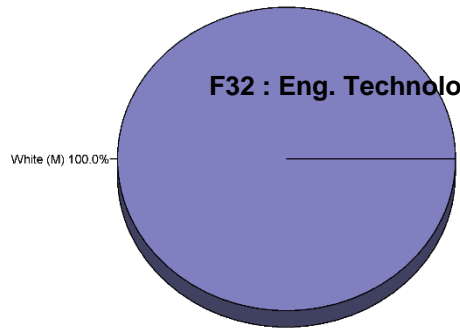
## F30 : Urban Studies



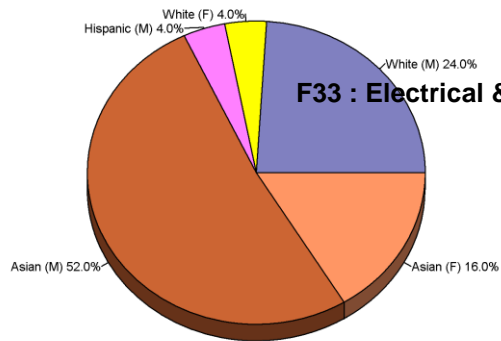
## F31 : Law



## F32 : Eng. Technology



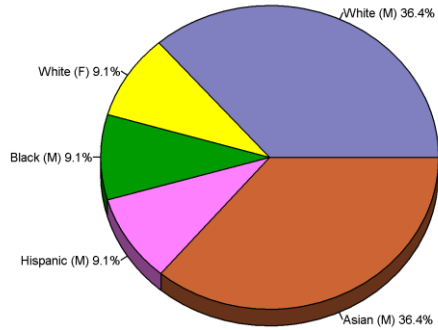
## F33 : Electrical & Computer Engineering



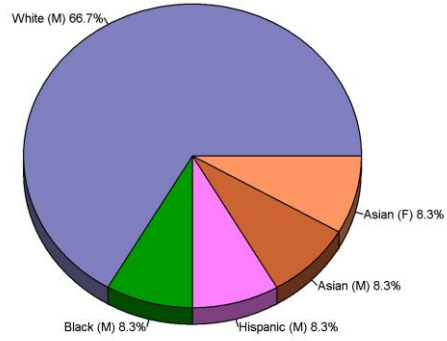


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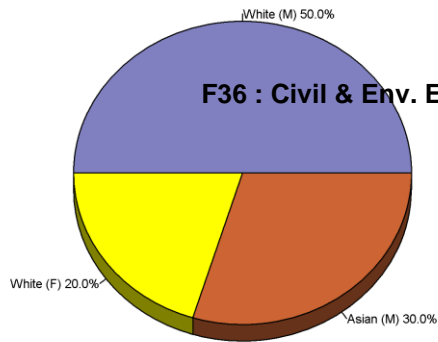
## F34 : Chemical & Biomedical Engineering



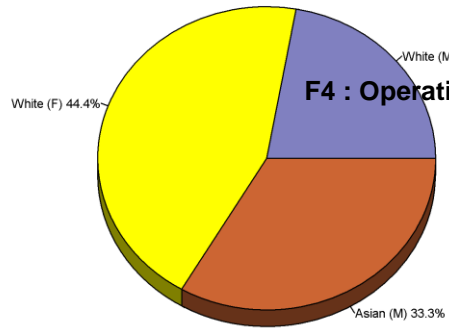
## F35 : Mechanical Engineering



## F36 : Civil & Env. Eng.

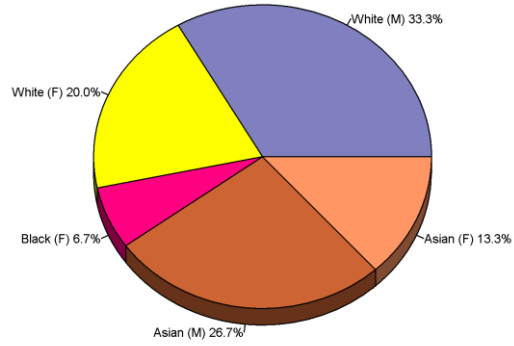


## F4 : Operations & Supply Management

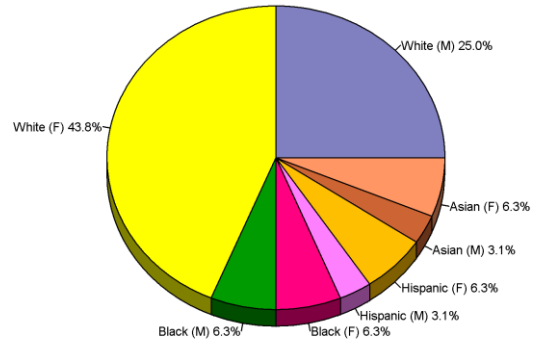


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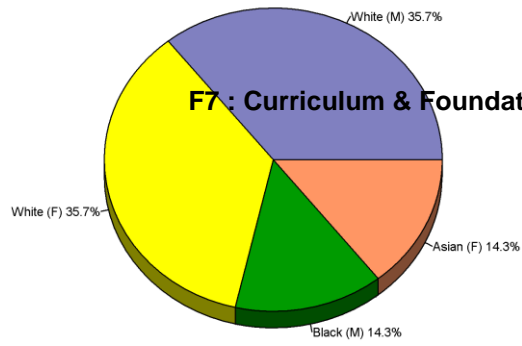
**F5 : Marketing**



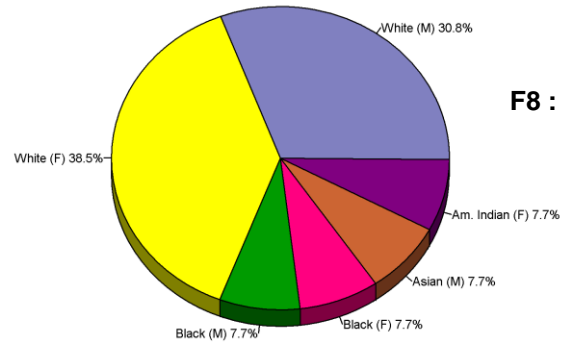
**F6 : Teacher Education/Health&Human Performance**



**F7 : Curriculum & Foundations**

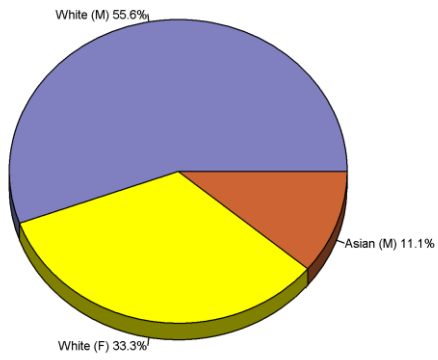


**F8 : CASAL**



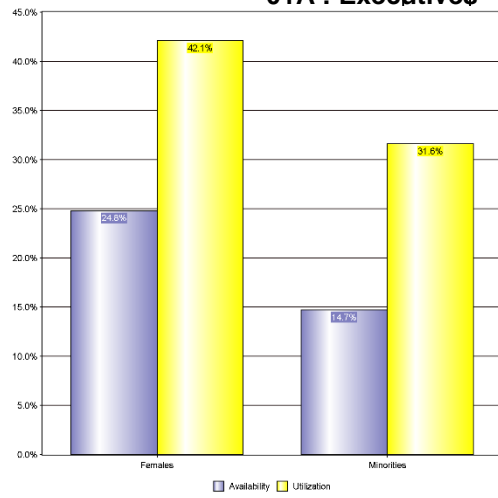
# Cleveland State University

**F9 : Communication**

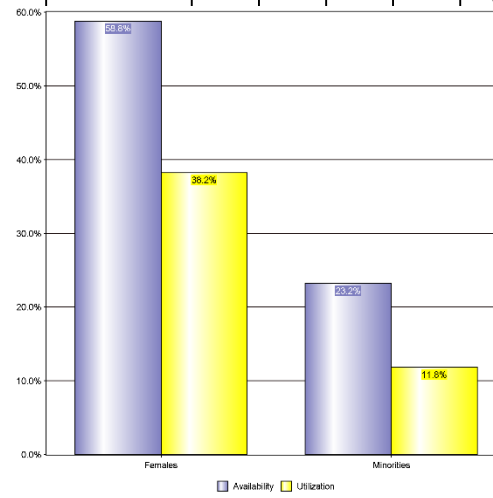


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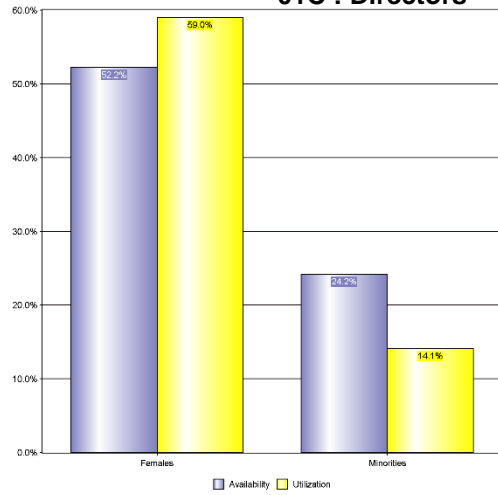
## 01A : Executives



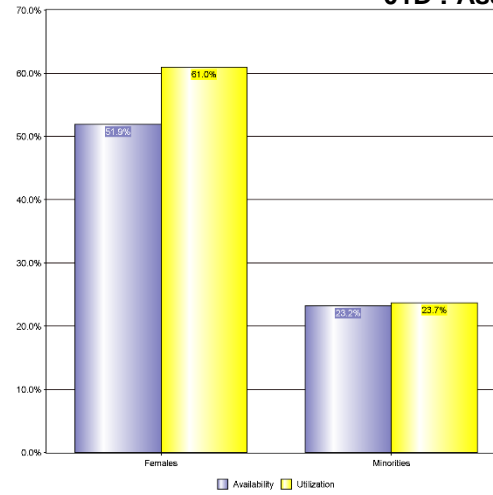
## 01B : AVPs



## 01C : Directors

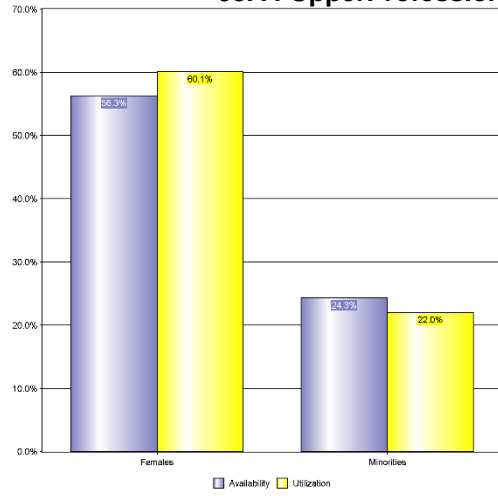


## 01D : Asst/ Assoc. Directors

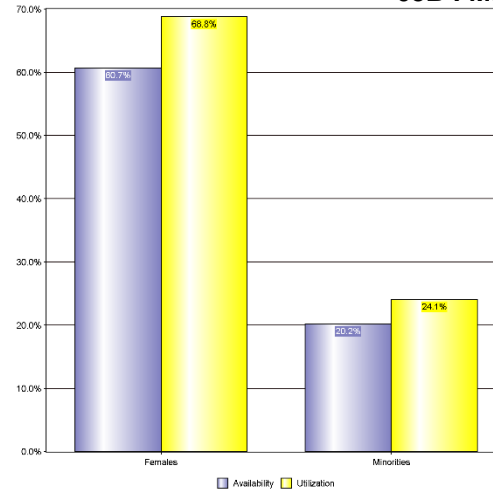


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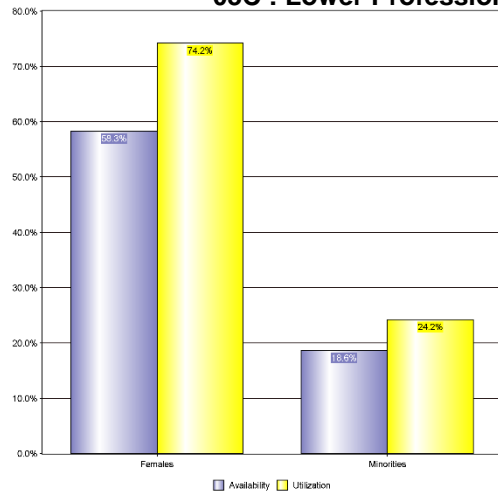
## 03A : Upper Professional



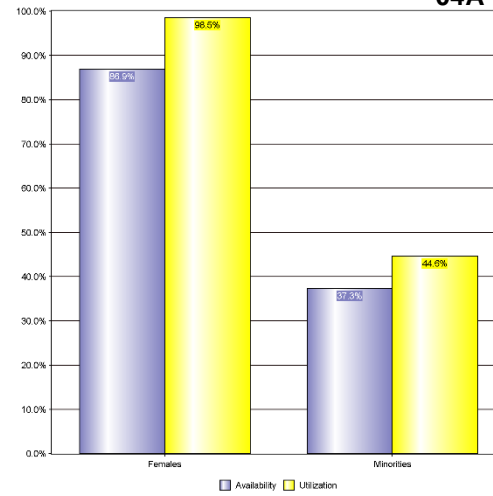
## 03B : Middle Professional



## 03C : Lower Professional

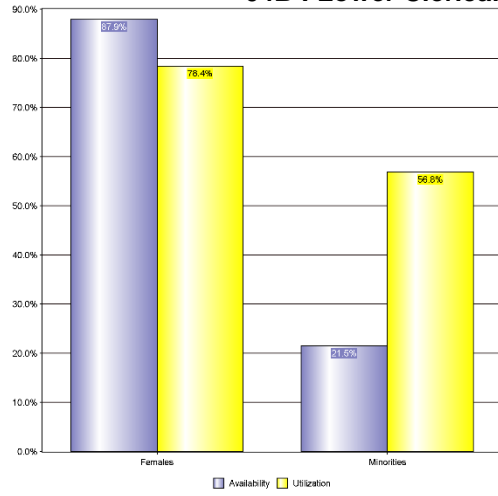


## 04A : Upper Clerical

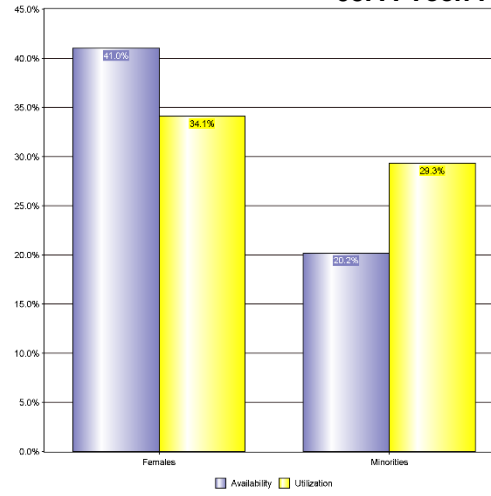


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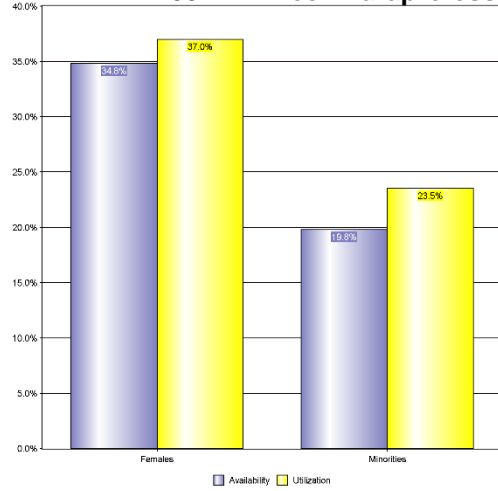
## 04B : Lower Clerical



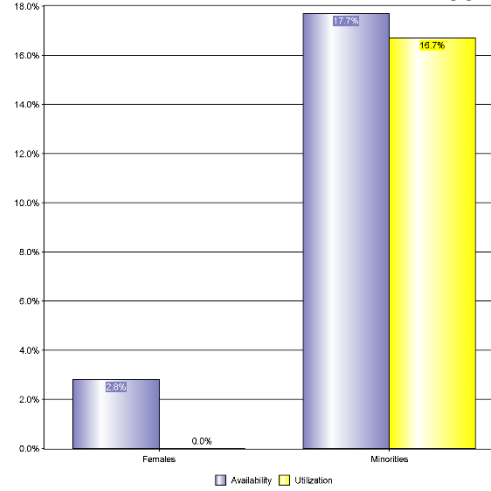
## 05A : Tech Paraprofessional - Misc.



## 05B : IT Tech Paraprofessionals

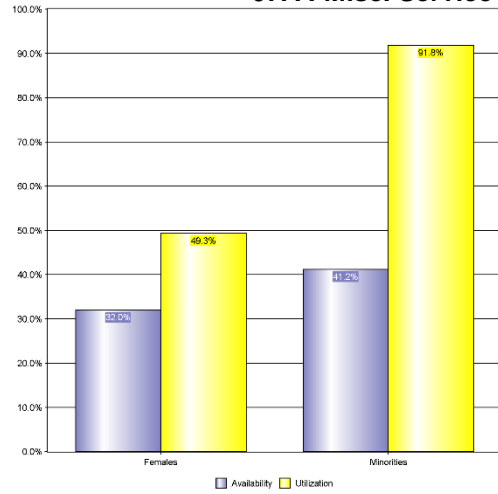


## 06A : Skilled Craft

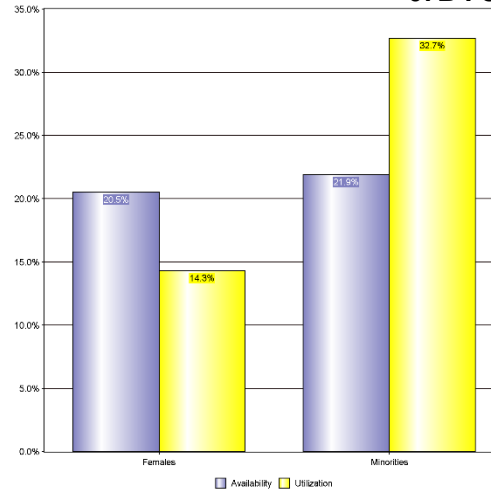


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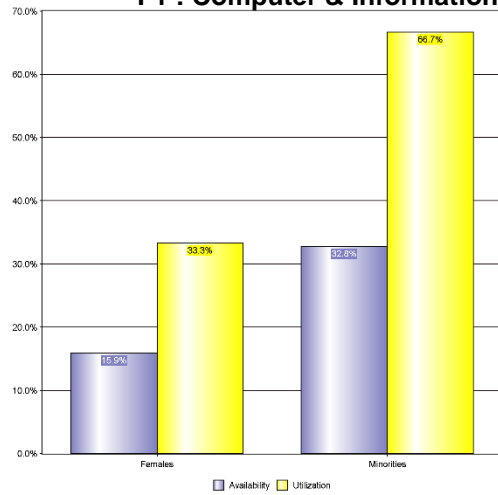
## 07A : Misc. Service



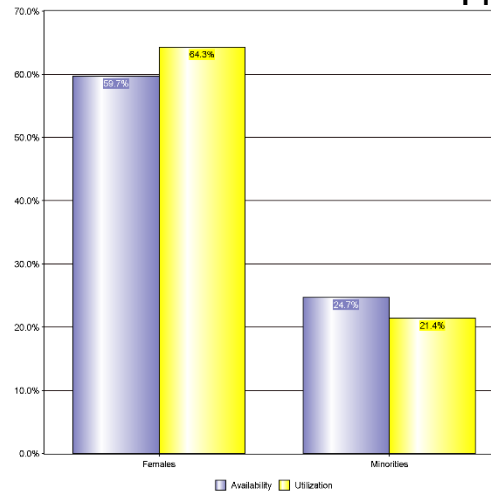
## 07B : Service Protective



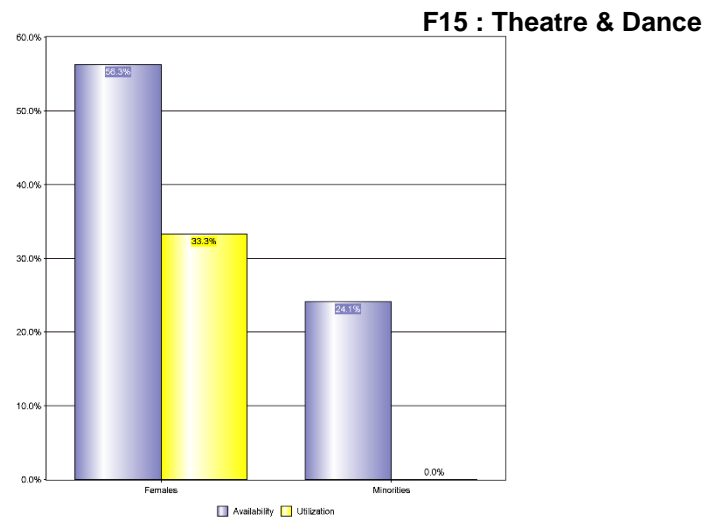
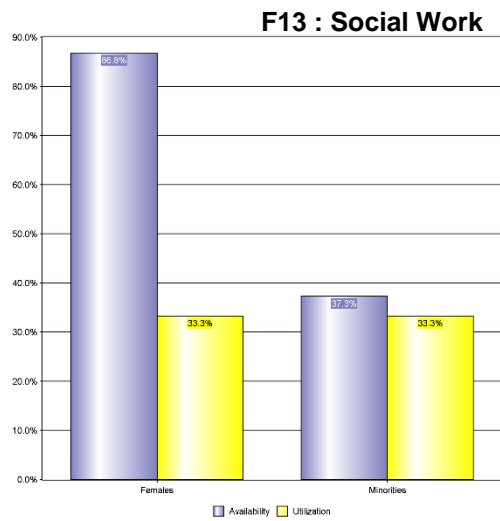
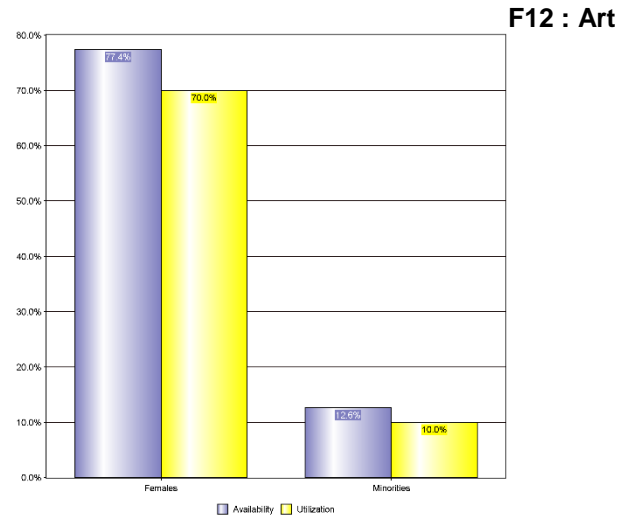
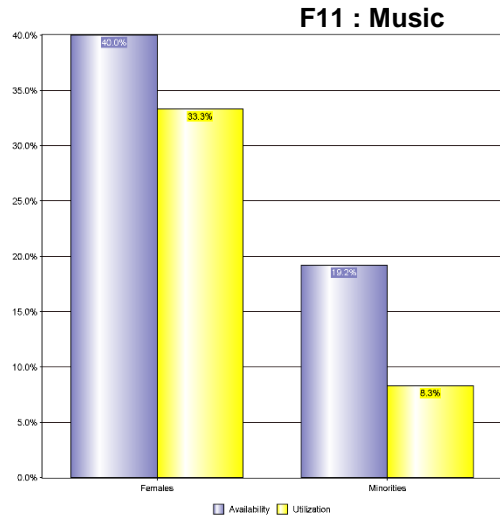
## F1 : Computer & Information Science



## F10 : Sociology



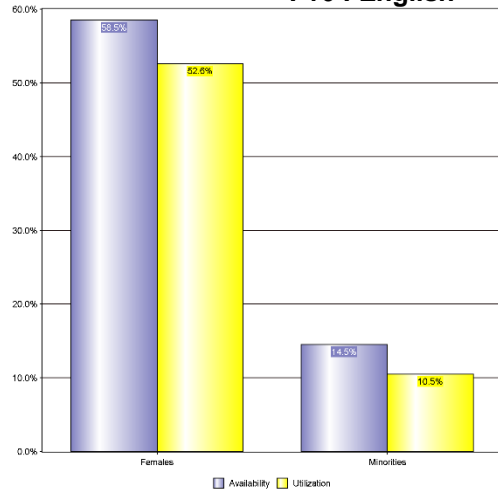
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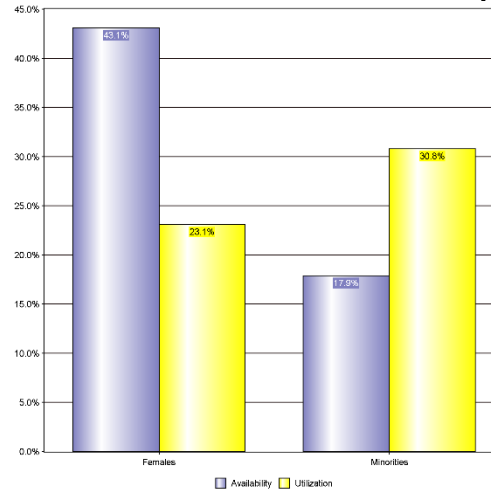


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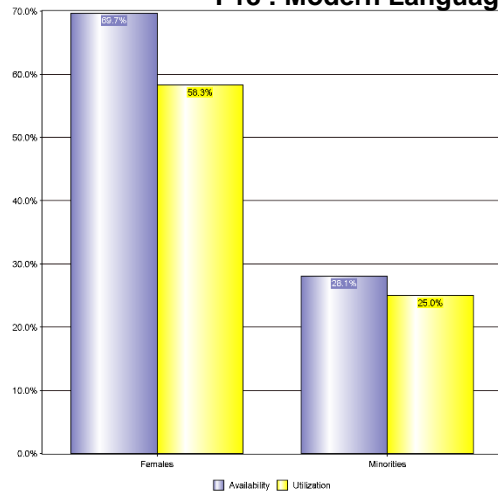
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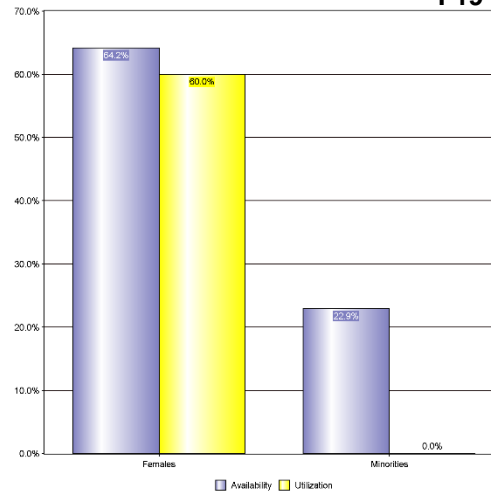
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## F18 : Modern Languages

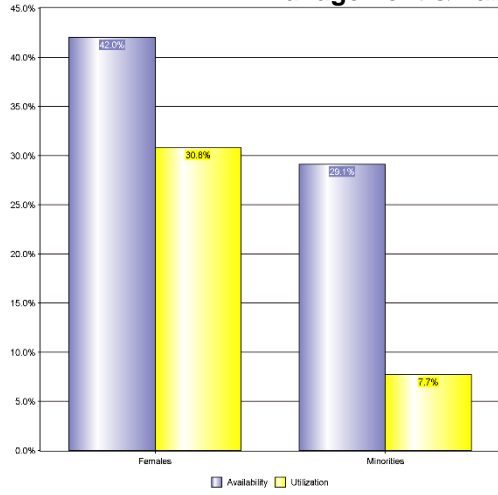


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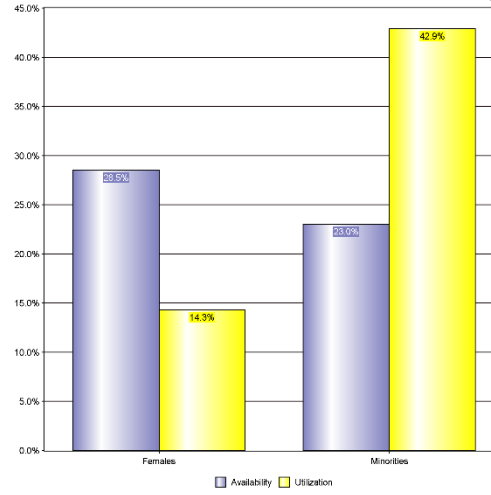


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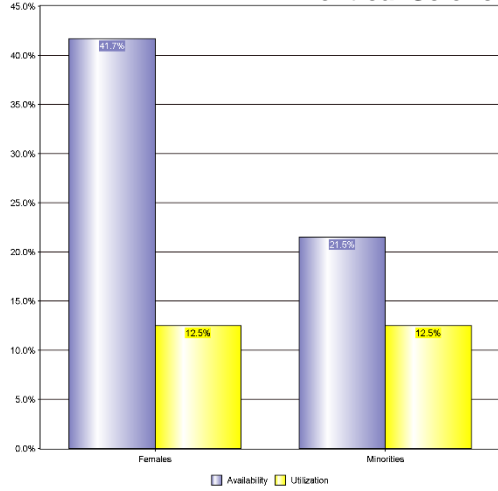
## F2 : Management & Labor



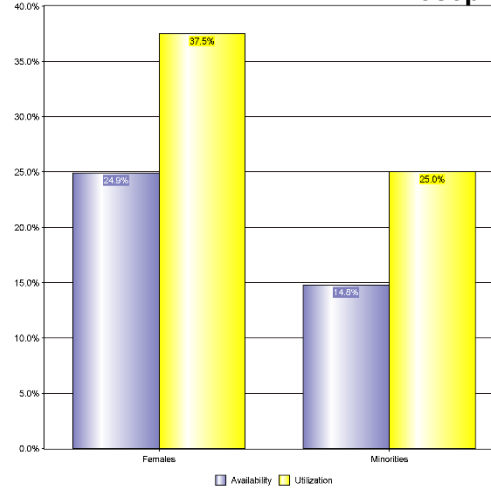
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## F21 : Political Science

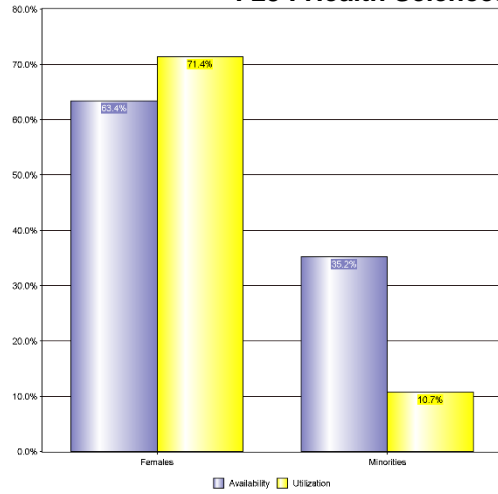


## F22 : Philosophy & Comparative Religion

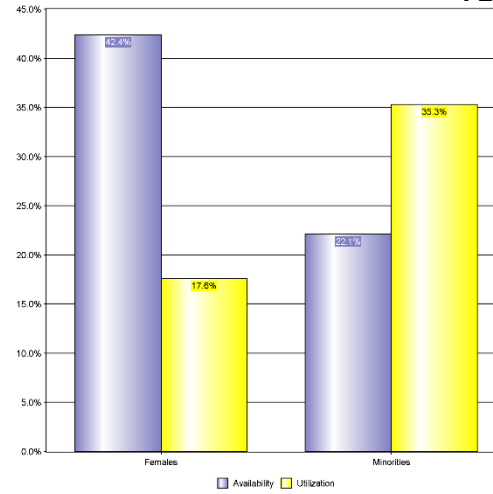


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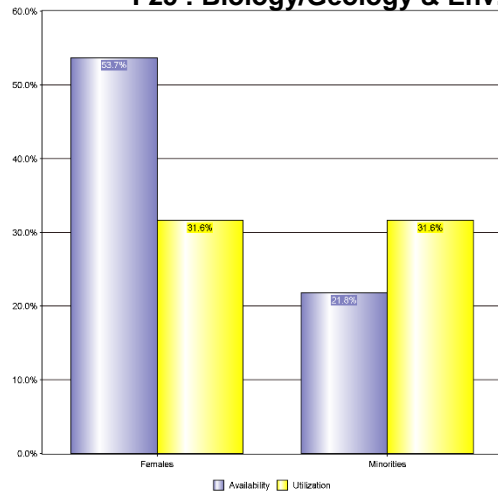
## F23 : Health Sciences



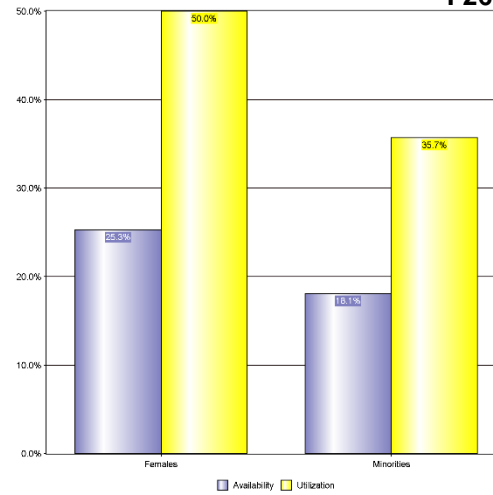
## F24 : Chemistry



## F25 : Biology/Geology & Env. Science

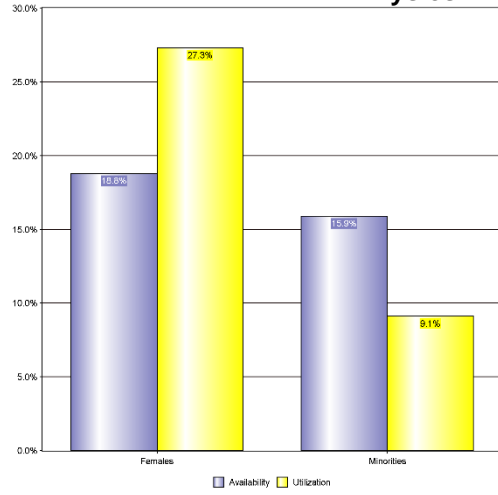


## F26 : Mathematics

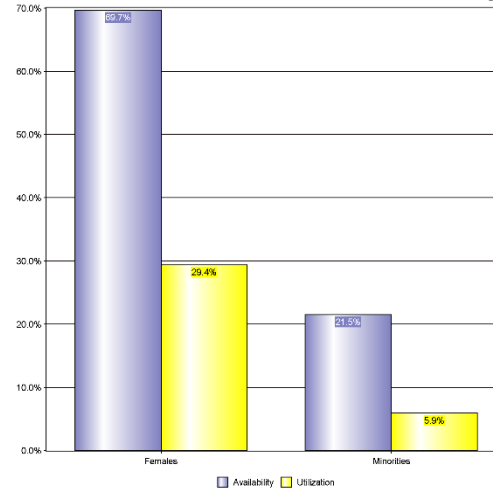


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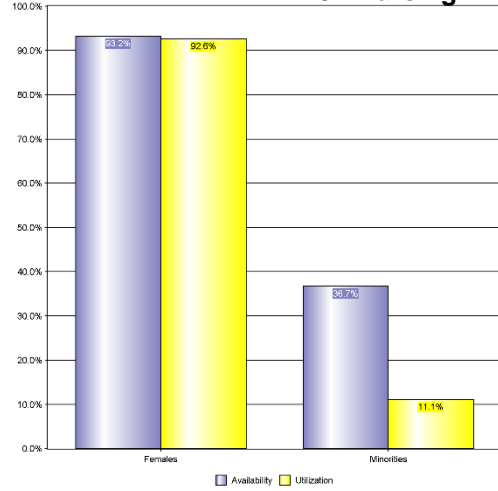
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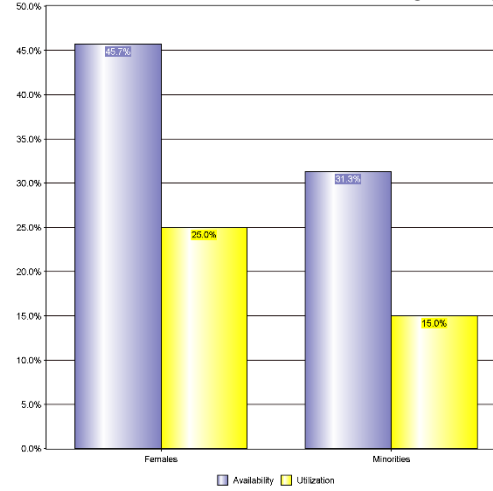
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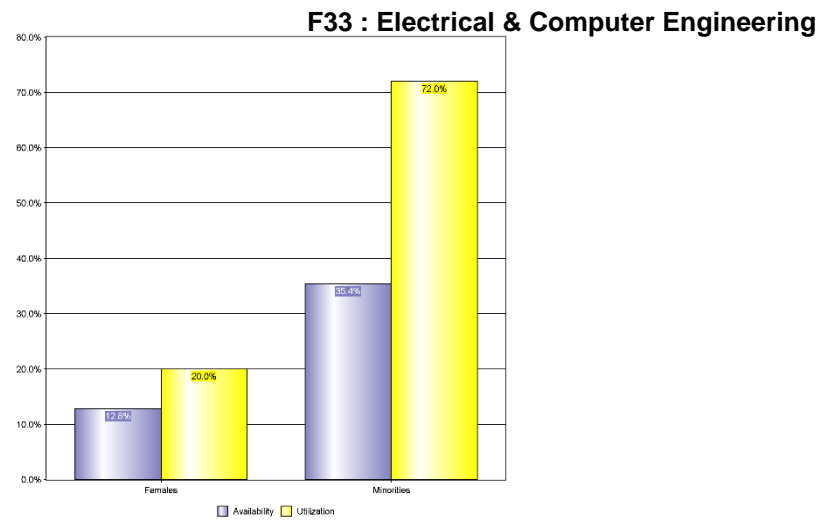
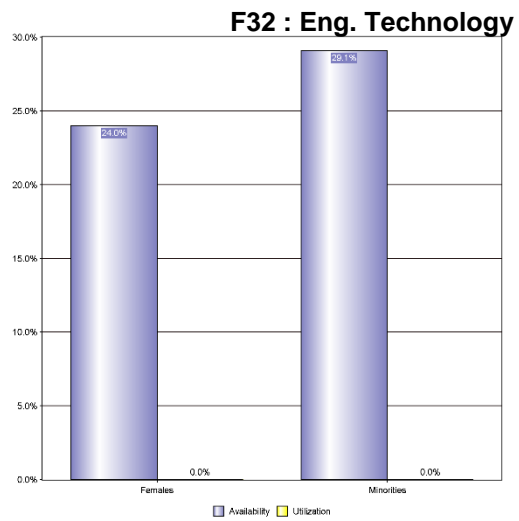
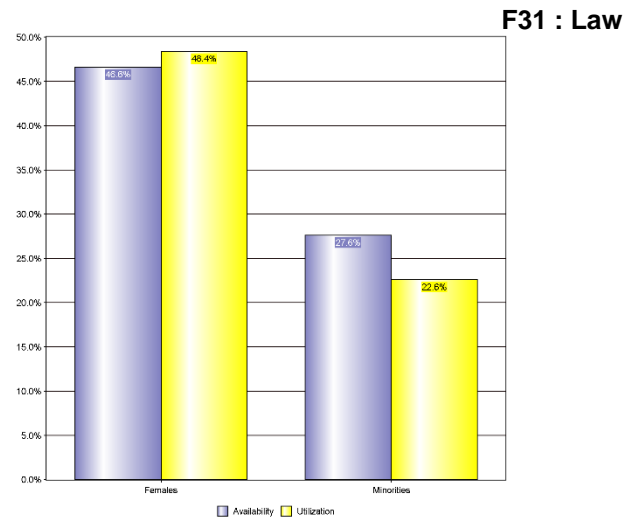
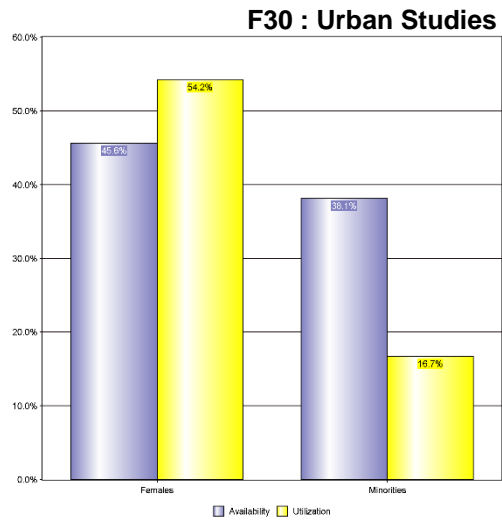
## F29 : Nursing



## F3 : Finance & Accounting

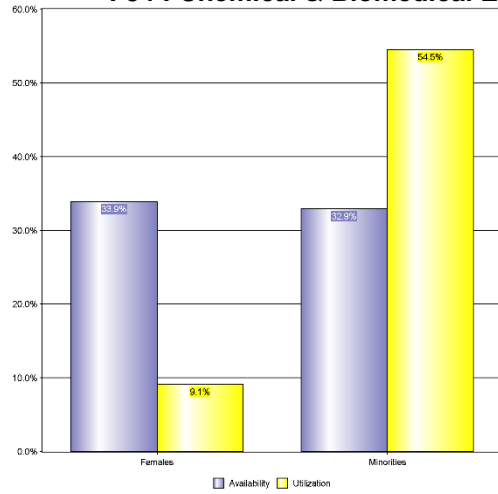


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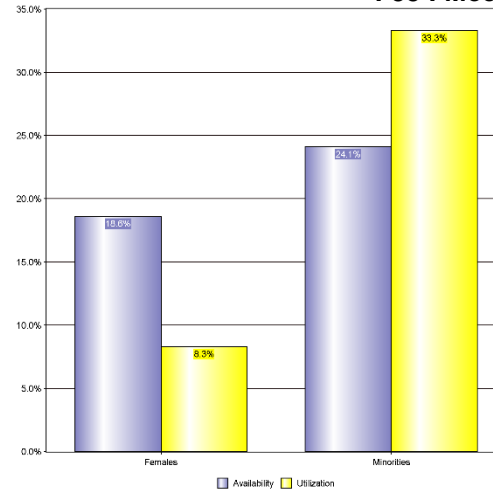


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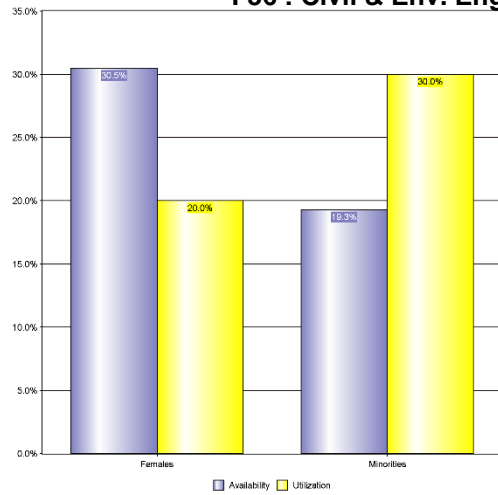
## F34 : Chemical & Biomedical Engineering



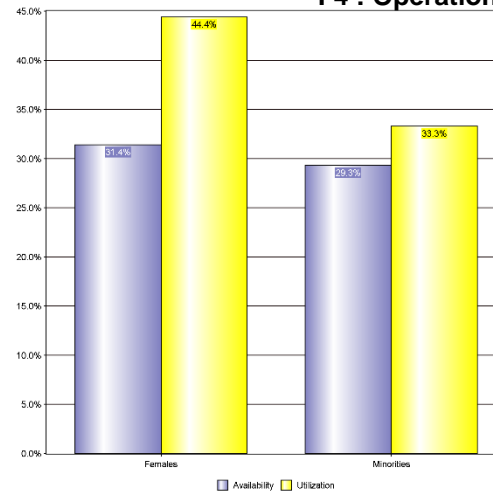
## F35 : Mechanical Engineering



## F36 : Civil & Env. Eng.

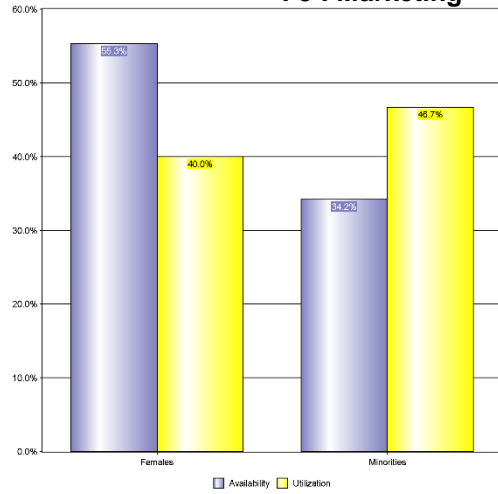


## F4 : Operations & Supply Management

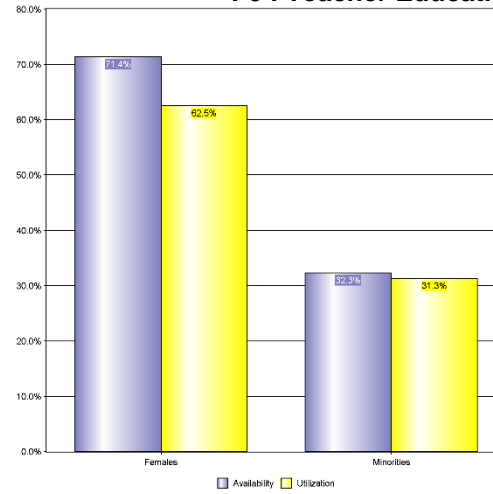


# Cleveland State University

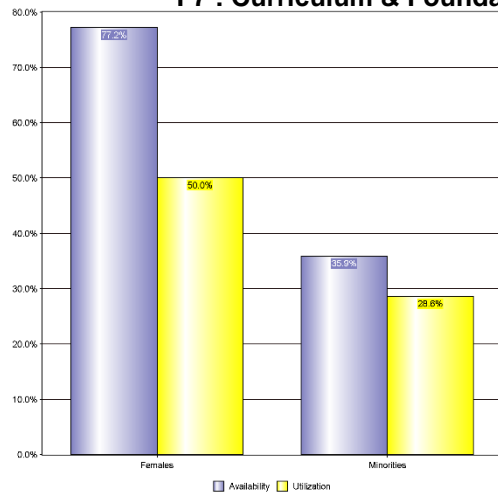
## F5 : Marketing



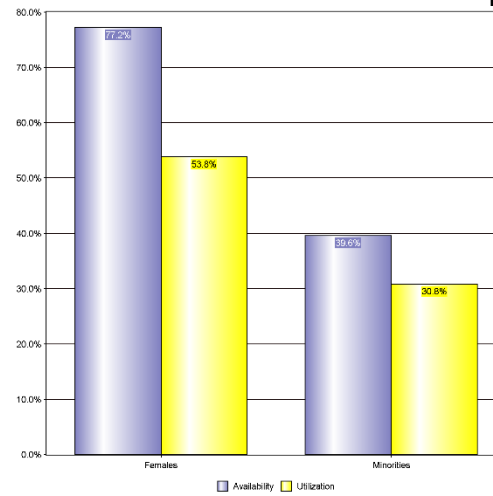
## F6 : Teacher Education/Health&Human Performance



## F7 : Curriculum & Foundations

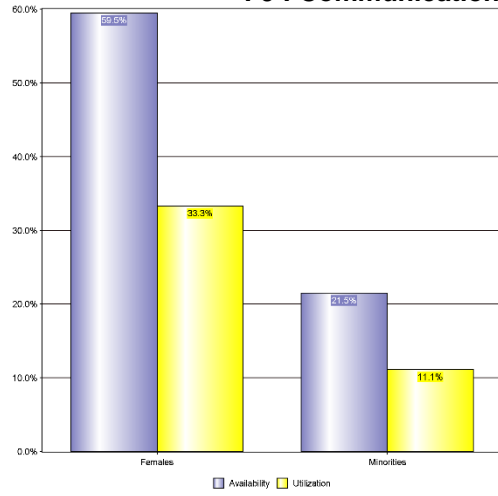


## F8 : CASAL



# Cleveland State University

## F9 : Communication





## **PLACEMENT GOALS - COMPARING INCUMBENCY TO AVAILABILITY**

### **41 CFR Section 60-2.15**

Cleveland State University compares the percentage of women and minorities in each job group determined pursuant to Sec. 60-2.13 with the availability for those job groups determined pursuant to Sec. 60-2.14. When the percentage of minorities or women employed in a particular job group is less than would reasonably be expected given their availability percentage in that particular job group, a placement goal is established in accordance with Sec. 60-2.16.

## **PLACEMENT GOALS**

### **41 CFR Section 60-2.16**

Placement goals serve as objectives or targets reasonably attainable by means of applying every good faith effort to make all aspects of the entire affirmative action program work. Placement goals are also used to measure progress toward achieving equal employment opportunity.

The establishment of a goal under Sec. 60-2.15 is neither a finding nor an admission of discrimination.

Where, pursuant to Sec. 60-2.15, a placement goal for a particular job group is established, a percentage goal is equal to the availability figure derived for women or minorities, as appropriate, for that job group.

In establishing placement goals, the following principles from Sec 60-2.16(e) also apply:

1. Placement goals are neither rigid or inflexible quotas, nor are they considered to be either a ceiling or a floor for the employment of particular groups.
2. All employment decisions are made in a nondiscriminatory manner. Placement goals are not used to extend a preference to any individual, select an individual, or adversely affect an individual's employment status on the basis of that person's race, color, religion, sex, sexual orientation, gender identity, or national origin.
3. Placement goals do not create set-asides for specific groups, nor are they intended to achieve proportional representation or equal results.
4. Placement goals are not used to supersede merit selection principles.

## **ACTION ORIENTED PROGRAMS**

### **41 CFR Section 60-2.17(c)**

Cleveland State University develops these action-oriented programs to correct any problem areas identified in the Identification of Problem Areas 41 C.F.R. Section 60-2.17(b) and to attain established goals and objectives.

#### **THE SELECTION PROCESS**

1. At least annually, a detailed analysis of position descriptions is conducted to ensure that they accurately reflect position functions.
2. Job requirements are validated by division, department, location or other appropriate organizational units. Special attention is given to academic, experience, physical, and skill requirements to ensure that the requirements themselves do not constitute inadvertent discrimination. Job specifications are free from bias in regard to race, color, religion, sex, sexual orientation, gender identity, national origin, age, or disabled or veteran status, except where there is a bona fide occupational qualification. Job requirements are validated when the number of individuals from a particular race or gender group is disproportionately selected as determined by Impact Ratio studies.
3. Position descriptions and specifications are distributed to recruiting sources and members of management involved in the recruiting, screening, selection, and promotion processes.
4. Selection processes are evaluated at least annually to ensure that they are nondiscriminatory.
5. Individuals who have a role in the selection process are chosen with special care given to their qualifications for such roles and are provided any necessary ongoing training to ensure that the selection processes remain nondiscriminatory.

#### **RECRUITMENT**

Any one or all of the following techniques are used to improve recruitment and increase the flow of minority or female applicants:

1. Linkage with recruiting sources, which may include briefing sessions, plant tours, presentations by minority and female employees, and full descriptions of appropriate job openings and the selection process;
2. Encouragement of minority and female employees to refer qualified applicants;
3. Inclusion of women and minorities on the personnel staff;
4. Minority and female participation in career days, youth motivation programs and other similar programs in the community;
5. Minority and female participation in "job fairs;"
6. Active recruiting at various training institutions, especially those that have high minority and female enrollments; and
7. Expansion of help-wanted advertising to include the minority news media and women's interest media.

## PROMOTIONS

Any one or all of the following techniques are used to improve promotional opportunities for minority and female employees:

1. Posting or general announcement of all appropriate job openings;
2. Assessment of current female and minority employees' academic, skill and experience levels;
3. Provision of job training and work-study programs;
4. Completion of performance appraisals;
5. Validation of job specifications;
6. Justification by supervisors when apparently qualified minority or female employees are passed over;
7. Establishment of career counseling programs, which may include attitude development, education aid, job rotations, buddy systems and similar programs;
8. Ongoing review of seniority practices in clauses and contracts to ensure that they are nondiscriminatory;  
and
9. Review of all company-sponsored recreational and social activities to ensure that they are desegregated.

## **IDENTIFICATION OF PROBLEM AREAS**

### **41 CFR Section 60-2.17(b)**

As part of the monitoring practice, an analysis of personnel matters is conducted. The following items are considered:

1. Composition of the workforce by minority group and sex. Good faith placement goals are established where necessary.
2. Composition of applicant flow by minority group and sex. Corrective action is taken when appropriate whenever the referral ratio of women and minorities indicates a significantly higher percentage is being rejected as compared to non-minority and male applicants.
3. Compensation system. Cleveland State University evaluates its compensation system to determine whether there are gender, race or ethnicity-based disparities. The purpose of the analysis is to identify potential areas where impediments to equal employment opportunity may exist. Disparities alone do not necessarily indicate a problem area; there may be many non-discriminatory reasons for a disparity.
4. Selection process. The selection process includes: position descriptions, titles, application forms, pre-employment forms, interview procedures, test validity and administration, referral procedures, final selection process and similar factors. The application and related pre-employment forms are in compliance with federal guidelines, and position descriptions accurately reflect actual duties and responsibilities.

The following areas are reviewed annually to ensure the success of this affirmative action program:

- Transfer and promotion practices,
- Facility and Cleveland State University sponsored recreational, social and educational events,
- EEO posters,
- Policy statements,
- Training Programs, and
- Suitable housing and transportation does not inhibit recruitment efforts and employment of minorities.

## **INTERNAL AUDIT AND REPORTING SYSTEMS**

### **41 CFR Section 60-2.17(d)**

Monitoring and reporting procedures are developed to evaluate the extent to which the goals of the affirmative action program are being met. Cleveland State University takes the following measures:

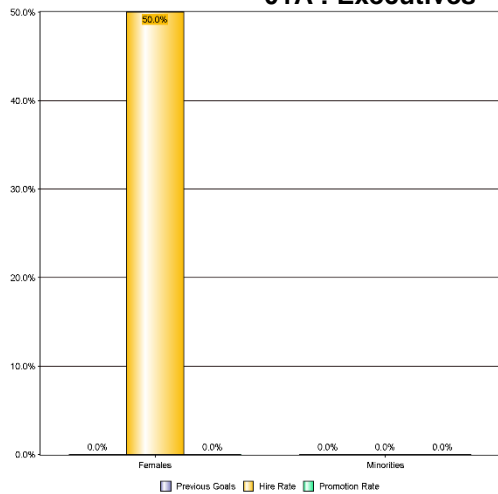
1. Information on race and sex is obtained when an application for a position is submitted.
2. An Adverse Impact (Impact Ratio) Analysis is performed when sufficient data exists on applicants, hires, promotions, and terminations to ensure compliance with the Uniform Employment Selection Guidelines.
3. Any training programs are analyzed regularly to eliminate potential discrimination in participation rates.
4. Any tests administered are routinely analyzed to uncover potential discrimination in grading scores or test results.
5. Compensation practices are reviewed at least annually for wage discrepancies.
6. The Availability Analysis for women and minorities is reviewed and good faith placement goals are established when necessary.
7. Progress toward established goals is reviewed at least annually for possible adjustments to employment practices.
8. Internal reporting is prepared as needed to determine why goals were not met.
9. Results of the affirmative action program are reviewed with all levels of management.
10. Top management is informed on a regular basis of the effectiveness of these policies and any recommendations for improvement.

**GOALS PROGRESS**  
**41 CFR Section 60-2.16, 60-2.17(d)**

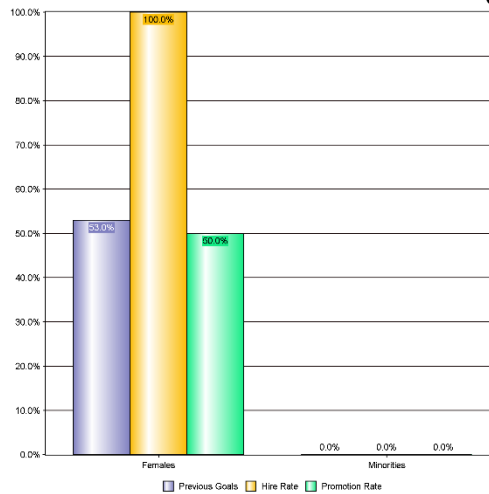
Cleveland State University monitors progress toward goals.

# Cleveland State University

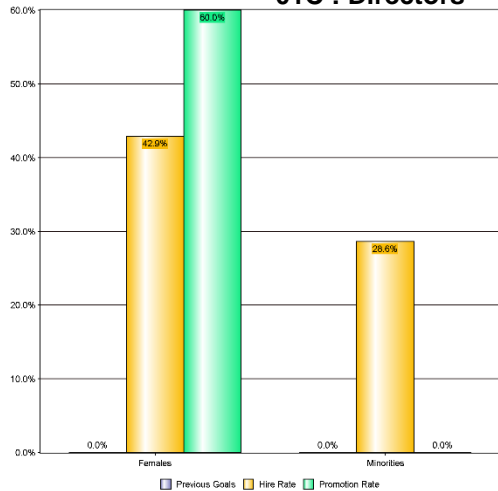
**01A : Executives**



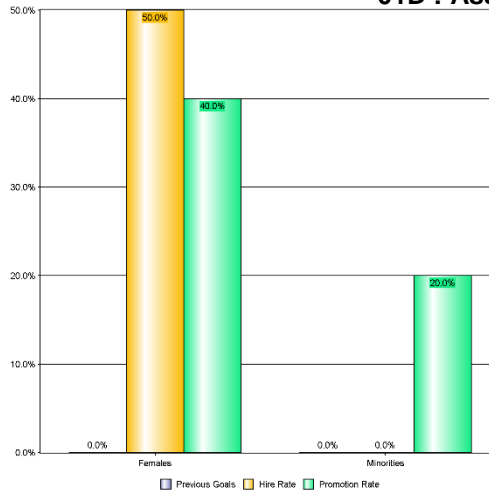
**01B : AVPs**



**01C : Directors**



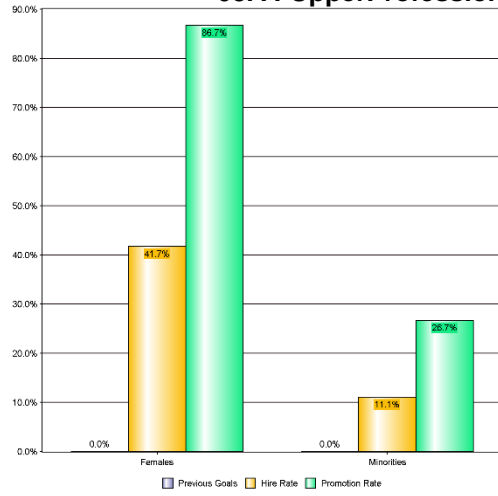
**01D : Asst/ Assoc. Directors**



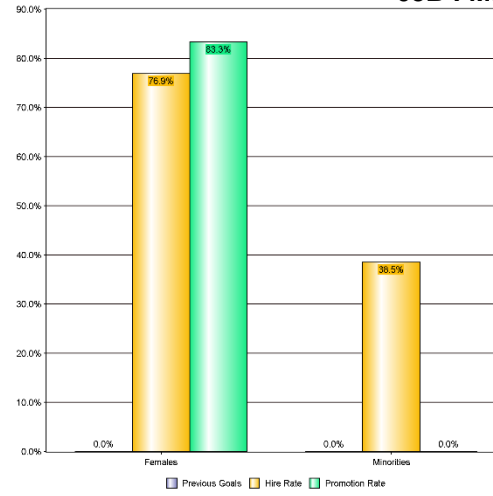


# Cleveland State University

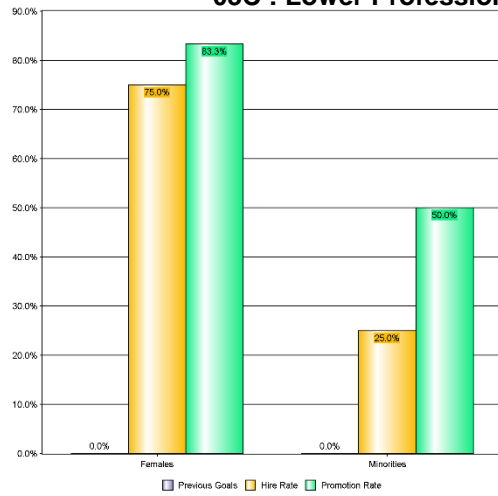
## 03A : UpperProfessional



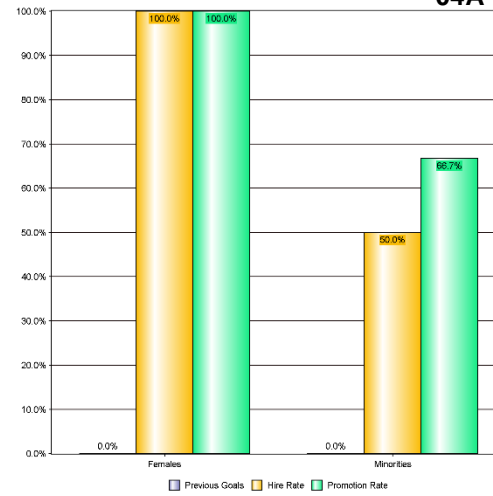
## 03B : Middle Professional



## 03C : Lower Professional



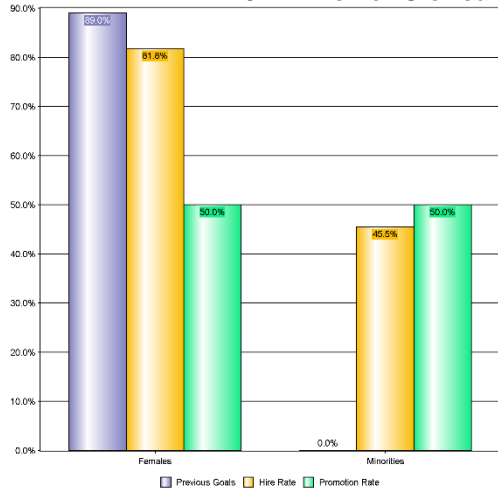
## 04A : Upper Clerical



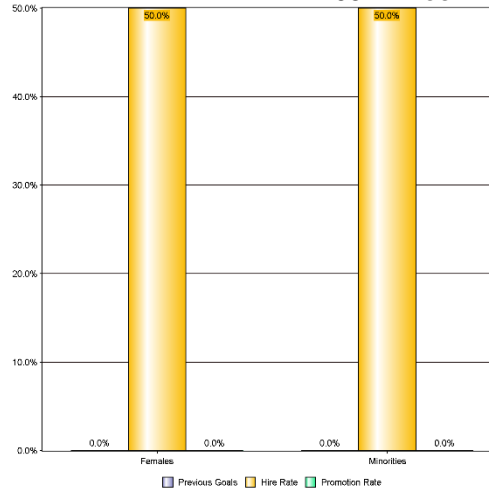
Goals Progress 09/01/2014 - 08/31/2015

# Cleveland State University

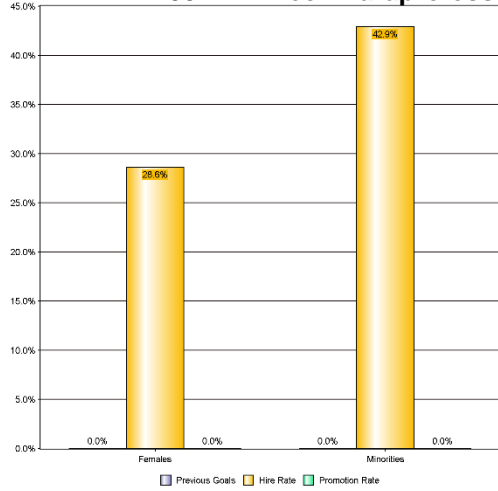
## 04B : Lower Clerical



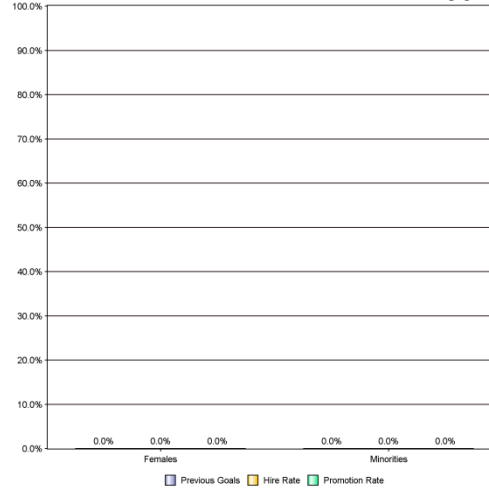
## 05A : Tech Paraprofessional - Misc.



## 05B : IT Tech Paraprofessionals

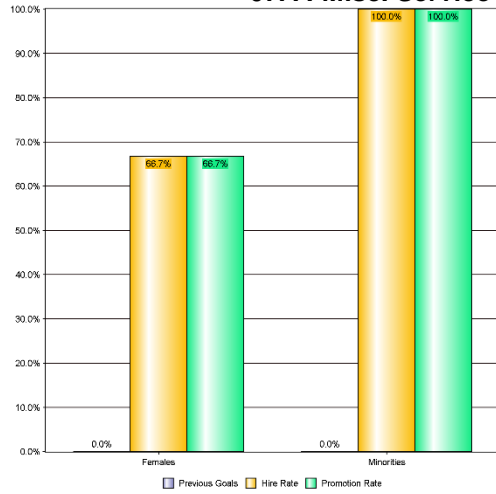


## 06A : Skilled Craft

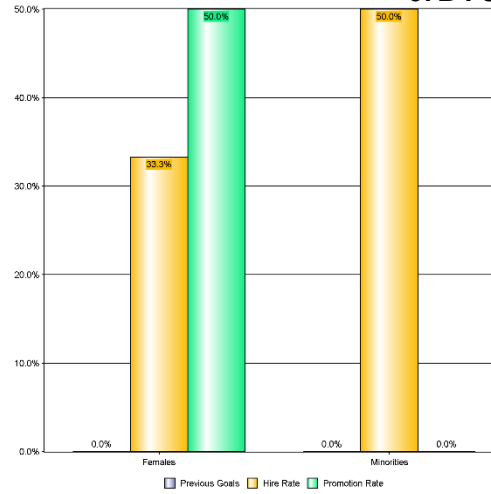


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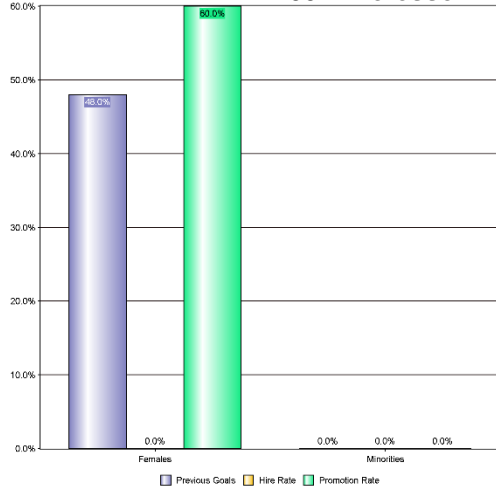
## 07A : Misc. Service



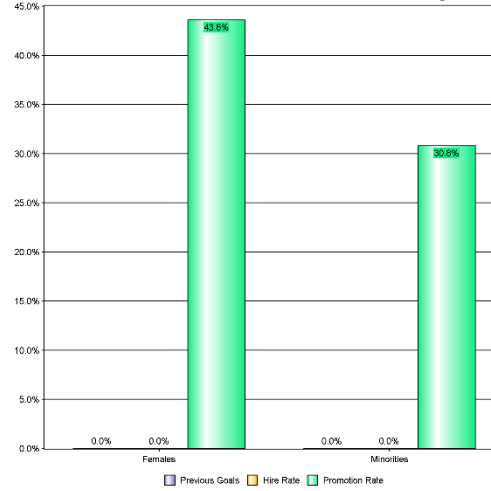
## 07B : Service Protective



## 200 : Professor



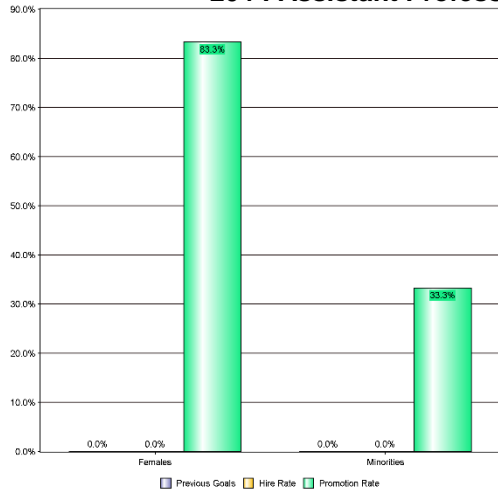
## 202 : Assoc Professor



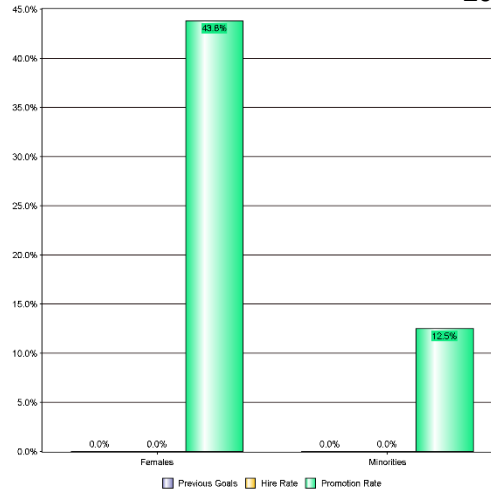
Goals Progress 09/01/2014 - 08/31/2015

# Cleveland State University

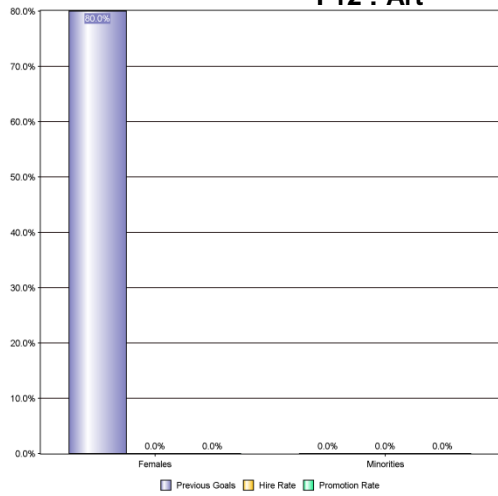
**204 : Assistant Professor**



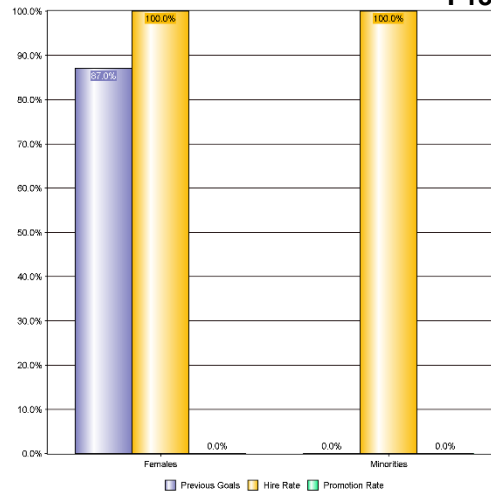
**206 : Lecturers**



**F12 : Art**

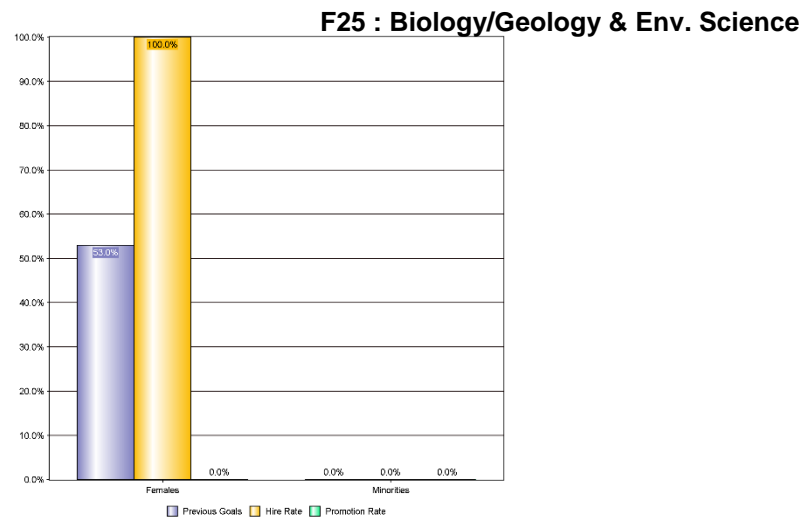
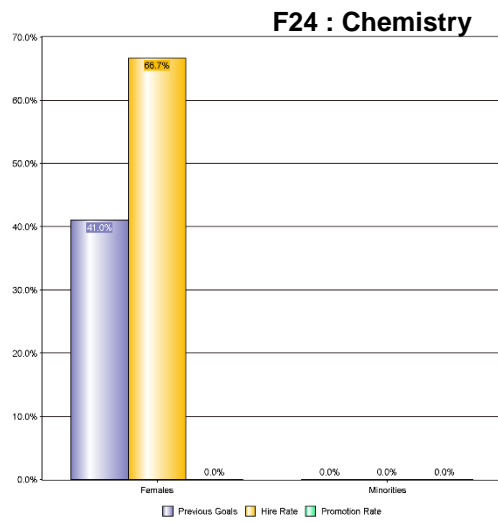
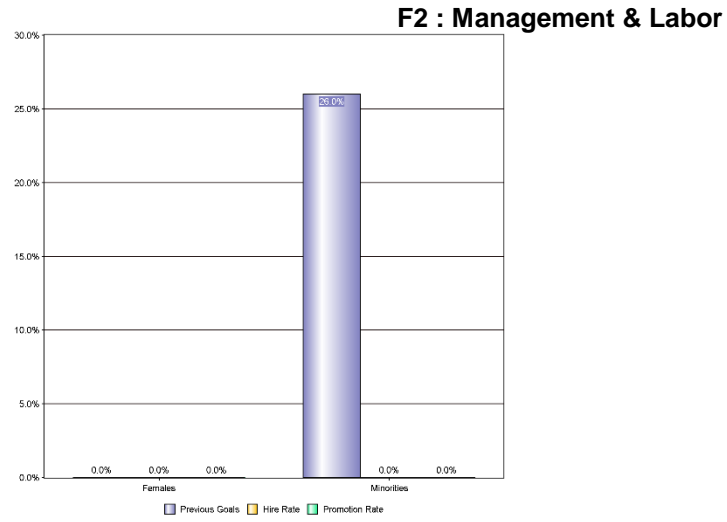
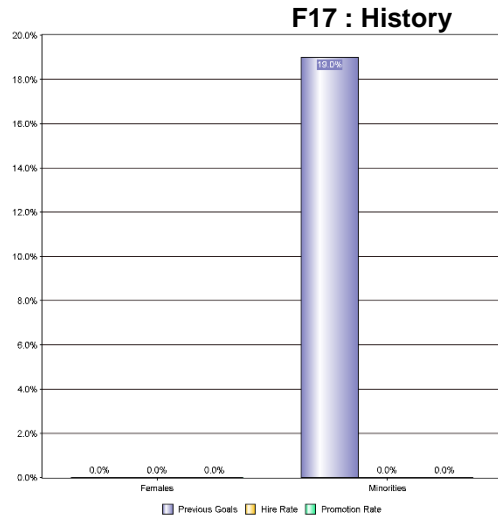


**F13 : Social Work**



Goals Progress 09/01/2014 - 08/31/2015

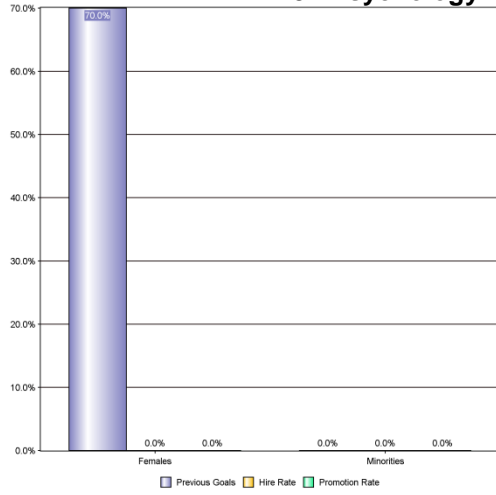
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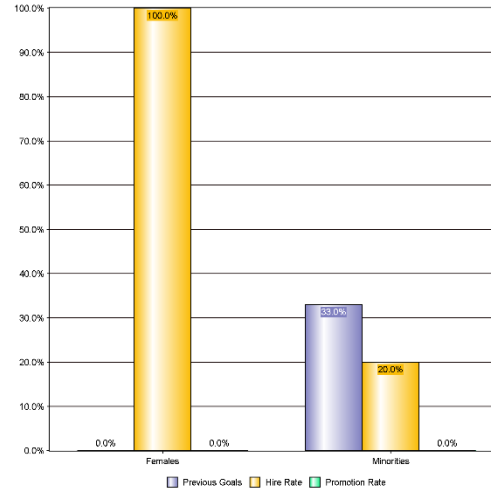
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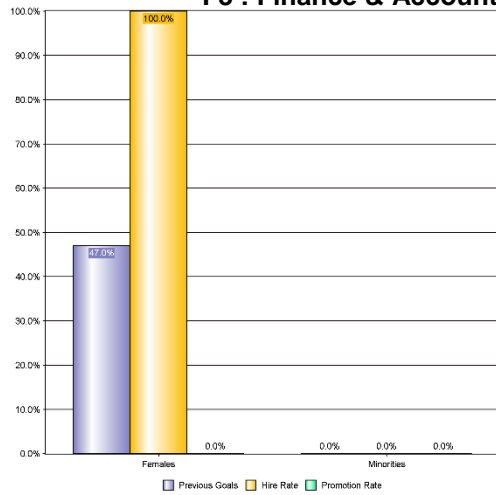
## F28 : Psychology



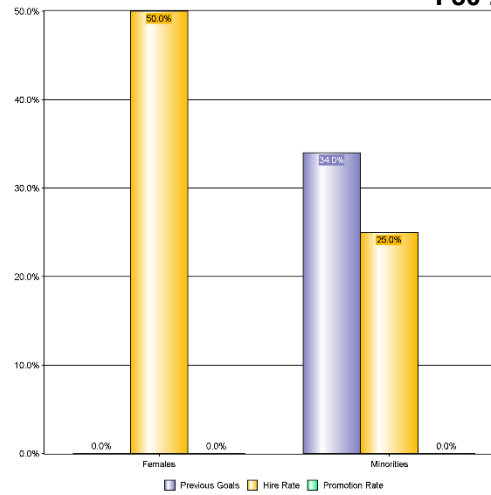
## F29 : Nursing



## F3 : Finance & Accounting



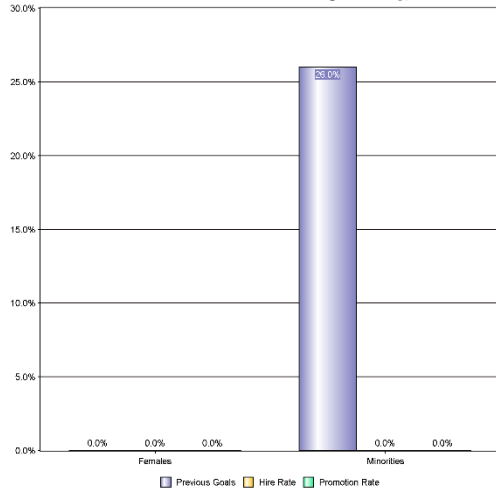
## F30 : Urban Studies



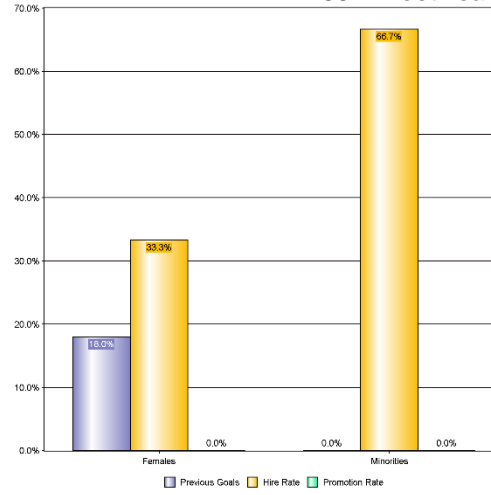
Goals Progress 09/01/2014 - 08/31/2015

# Cleveland State University

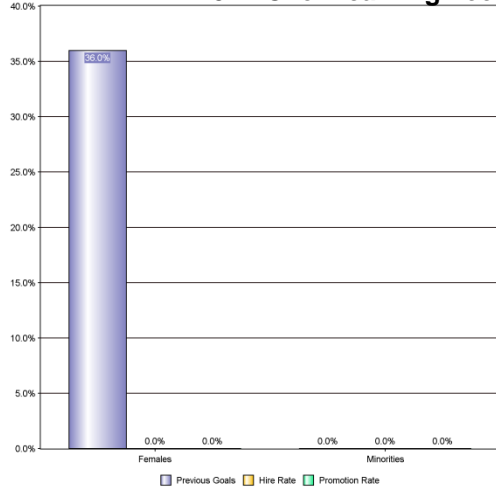
## F31 : Law



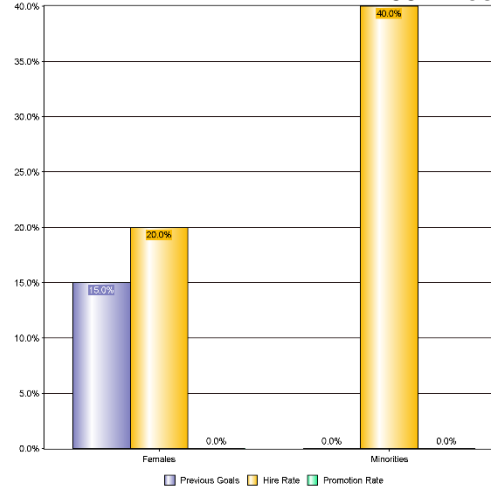
## F33 : Electrical & Computer Engineering



## F34 : Chemical Engineering



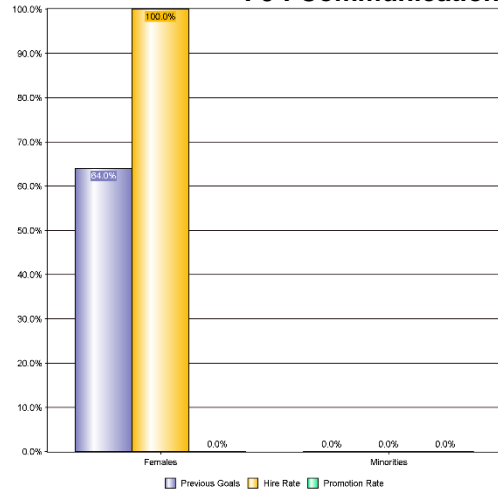
## F35 : Mechanical Engineering



Goals Progress 09/01/2014 - 08/31/2015

# Cleveland State University

## F9 : Communication



Goals Progress 09/01/2014 - 08/31/2015



## **RELIGION AND NATIONAL ORIGIN DISCRIMINATION GUIDELINES**

### **41 CFR Section 60-50**

Cleveland State University reaffirms its policy to afford equal employment opportunity to all individuals. Neither national origin nor religion is a factor in recruitment, selection, promotion, transfer, termination, or participation in training. The following activities are undertaken to ensure that religion and national origin are not used as a basis for employment decisions:

1. Employment practices are reviewed to ensure that members of particular religious and/or ethnic groups are given equal employment opportunities.
2. All employees, including supervisors, managers, and executives are informed of our commitment to provide equal employment opportunity without regard to religion or national origin.
3. Recruitment sources are informed of our commitment to provide equal employment opportunity without regard to religion or national origin.
4. Internal procedures exist to implement equal employment opportunity without regard to national origin or religion.

## **ACCOMMODATION FOR RELIGIOUS OBSERVANCE AND PRACTICE**

### **41 CFR Section 60-50.3**

The religious observances and practices of employees are accommodated by Cleveland State University, except where such accommodation would cause undue hardship on the conduct of business. The accommodation offered is determined by considering business necessity, financial expense and any personnel coverage problems that may result.

## **NONDISCRIMINATION**

### **41 CFR Section 60-50.5**

Cleveland State University does not discriminate against any qualified employee or applicant because of race, color, sex, sexual orientation, gender identity, age, disabled, or veteran status in implementing the policy concerning nondiscrimination based on religion or national origin.

## **NONDISCRIMINATION**

### **41 CFR Section 60-50.5**

It is the policy at Cleveland State University to provide equal employment and advancement opportunities to all qualified individuals. To achieve this goal, Cleveland State University is dedicated to taking affirmative action to employ and advance in employment protected veterans and individuals with disabilities. All personnel actions, including compensation, benefits, recruitment, hiring, training, and promotion of persons in all job titles, are administered without regard to protected veteran or disability status, and all employment decisions are based solely on valid job requirements. In addition, employees and applicants are protected from harassment, threats, coercion, intimidation, or discrimination for:

- 1) Filing a complaint;
- 2) Assisting or participating in an investigation, compliance review, hearing, or any other activity related to the administration of Section 4212, Section 503, or any other Federal, State, or local law requiring equal opportunity for protected veteran or individuals with disabilities;
- 3) Opposing any act or practice made unlawful by Section 4212, Section 503, or any other Federal, State or local law requiring equal opportunity for protected veterans and individuals with disabilities; or
- 4) Exercising any other right protected by Section 4212, Section 503.

This EEO policy has the full support of Ronald M. Berkman, President, who has assigned responsibility for its implementation to Yulanda McCarty-Harris, J.D., EEO Coordinator. Cleveland State University has designed and implemented an audit and reporting system to monitor and maintain its compliance with the Acts.

A copy of the Equal Employment Opportunity statement that reaffirms Cleveland State University's commitment to protected veterans and individuals with disabilities is posted in a form that is accessible and understandable to an individual with a disability.

## **NONDISCRIMINATION**

### **41 CFR Section 60-50.5**

Cleveland State University reviews its employment procedures to ensure careful, thorough, and systematic consideration of the job qualifications of protected veterans and applicants with disabilities for job vacancies filled either by hiring or promotion, and for all training opportunities offered or available. This review ensures that personnel procedures do not stereotype protected veterans and individuals with disabilities in a manner that limits their access to all jobs for which they are qualified. Applicants and employees with disabilities have equal access to personnel processes, including those implemented through information and communication technologies. Cleveland State University periodically reviews its processes, and makes any necessary modifications to ensure its affirmative action obligations are carried out. When protected veterans are considered for employment, only that portion of the individuals' military records, including discharge papers, that is relevant to the requirements of the position will be considered.

The following are some procedures that may be used to facilitate the review and evaluative process:

- 1) The application or personnel form of each protected veteran and applicant with a disability is annotated to identify each vacancy for which the applicant was considered, and is retrievable for review for use in investigations and internal compliance activities;
- 2) The application or personnel form of each protected veteran and applicant with a disability includes the identification of each promotion and training program for which that employee was considered;
- 3) When a protected veteran employee or applicant is rejected for employment, promotion, or training, a statement of the reason is appended to the personnel file;
- 4) When an employee or applicant with a disability is rejected for employment, promotion, or training, a statement of the reason is appended to the personnel file along with a description of any reasonable accommodation considered; and
- 5) When an employee or applicant is selected for hire, promotion, or training, and reasonable accommodation has been undertaken to enable the selection of an employee or applicant with a disability, the applicant form or personnel record contains a description of the reasonable accommodation.

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Cleveland State University reviews all physical and mental job qualification requirements as openings occur to ensure, to the extent that qualification requirements tend to screen out qualified disabled veterans and qualified individuals with disabilities, that they are job-related and consistent with business necessity and the safe performance of the job.

To the extent that physical or mental job qualification requirements tend to screen out qualified disabled veterans and qualified individuals with disabilities in the selection of employees or applicants for employment or other changes in employment status such as promotion or training, Cleveland State University assures that the requirements are related to the specific job(s) for which the individual is being considered, and are consistent with business necessity and the safe performance of the job.

## **NONDISCRIMINATION**

### **41 CFR Section 60-50.5**

Cleveland State University makes reasonable accommodations to the physical and mental limitations of employees or applicants to the extent that such accommodations do not impose an undue hardship on the conduct of its business. When an employee known to be a disabled veteran or an employee with a known disability has 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 employee is confidentially notified of the performance problem, and asked if the problem is related to the disability. If the employee indicates that the performance problem is related to his or her disability, the employee is asked if reasonable accommodation is needed.

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### **41 CFR Section 60-50.5**

Cleveland State University develops and maintains procedures to ensure that its employees are not harassed because of their status as a protected veteran, or on the basis of a disability.



## **NONDISCRIMINATION**

### **41 CFR Section 60-50.5**

Cleveland State University undertakes appropriate outreach and positive recruitment activities that are reasonably designed to effectively recruit protected veterans and individuals with disabilities, such as the following:

1) Cleveland State University incorporates the Equal Opportunity Clause regarding protected veterans and individuals with disabilities in its purchase orders, leases, and contracts as required by law, executive order, and regulation. Written notification of the Equal Opportunity Policy is sent to all subcontractors, vendors, and suppliers requesting appropriate action on their part.

2) Cleveland State University notifies all applicants of the EEO policy, and invites them to self-identify. Application forms state Cleveland State University's commitment to equal employment opportunity. All employment advertisements and notices to recruitment sources state this EEO policy.

3) Outreach and recruitment activities that may be undertaken as needed by Cleveland State University include enlisting the assistance and support of the following persons and organizations in recruiting, and developing on-the-job training opportunities for protected veterans and individuals with disabilities, in order to fulfill its commitment to provide equal employment opportunity for such individuals:

- The Local Veterans' Employment Representative in the local employment service office (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 National Resource Directory's Veterans Job Bank, or any future service that replaces or complements it;
- 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](http://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](http://www.earnworks.com));

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- 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](http://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.

4) All employment openings (except executive and top management, positions that are filled from within, and positions lasting three days or less) are listed at the appropriate state employment services office. Formal briefing sessions and facility tours may be conducted with representatives from recruiting sources to explain current and future job openings, position descriptions, worker specifications, and the selection process. Follow-up with these resources, and feedback on disposition of applicants are conducted when appropriate.

5) Cleveland State University develops internal communication of these outreach efforts in a manner that fosters understanding, acceptance, and support among executive management, supervisors, and all other employees.

6) Meaningful contacts are established with veteran's service organizations and organizations for individuals with disabilities for such purposes as advice, technical assistance, and referral of potential employees. Such assistance may consist of advice concerning proper placement, recruitment, training, and reasonable accommodation.

7) Good faith efforts are made to consider protected veterans and applicants with known disabilities for all available positions for which they may be qualified, to the extent practicable.

8) Recruitment at educational institutions includes efforts to reach students who are protected veterans.

9) Recruitment programs established with schools incorporate efforts to reach students with disabilities. Efforts may be made to participate in work-study programs with rehabilitation facilities and schools that specialize in training or educating individuals with disabilities.

10) When appropriate, efforts may be made to participate in work-study programs with Department of Veterans Affairs rehabilitation facilities that specialize in training or educating disabled veterans.

11) Efforts are made to include individuals with disabilities when employees are pictured in consumer, promotional, or help wanted advertisements.

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Cleveland State University each year reviews the outreach and recruitment efforts it has taken over the previous twelve months to evaluate their effectiveness in identifying and recruiting qualified protected veterans and qualified individuals with disabilities. Each evaluation is documented, including at a minimum the criteria used to evaluate the effectiveness of each effort and the conclusion as to whether each effort and the totality of the efforts are effective. Among these criteria are the Data Collection Analysis for the current year and the two most recent previous years. If Cleveland State University concludes the totality of its efforts are not effective in identifying and recruiting qualified protected veterans and qualified individuals with disabilities, alternative outreach and recruitment efforts are identified and implemented.

Cleveland State University concludes that each and the totality of its efforts are effective in identifying and recruiting qualified protected veterans and qualified individuals with disabilities.

## **NONDISCRIMINATION**

### **41 CFR Section 60-50.5**

Cleveland State University has developed the following internal procedures to communicate its obligation to engage in affirmative action efforts to employ and advance in employment protected veterans and qualified individuals with disabilities. These procedures are designed to foster understanding, acceptance, and support among executive, management, supervisory, and other employees, and to encourage such persons to take the necessary actions to meet this obligation.

1) Cleveland State University Notices. The EEO policy statement is posted on the employee bulletin board and/or electronically in a manner and place that ensures that protected veterans and individuals with disabilities are informed of its contents. This notice states the name of the EEO Coordinator, the support of top-level management toward this policy, and to whom questions, comments, or complaints should be directed. A statement is included that employees are protected from coercion, intimidation, interference, or discrimination for filing a complaint or assisting in an investigation under the Acts. All required state and federal EEO notices are also posted on bulletin boards.

2) Union Contracts. A non-discrimination clause is included in any union contracts and any such contracts are reviewed to ensure that they are non-discriminatory. Cleveland State University notifies union officials and/or employee representatives of the contractor's policy, and requests their cooperation.

3) Other procedures that may be implemented as needed:

a. Cleveland State University's overall commitment, top-level management support, and implementation of the plan are discussed with management personnel, making clear the chief executive officer's support for the affirmative action policy;

b. All employees and prospective employees are informed of Cleveland State University's commitment to engage in affirmative action to increase employment opportunities for protected veterans and individuals with disabilities;

c. Cleveland State University's affirmative action policy is publicized in the company newspaper, magazine, annual report, and other media;

d. The policy is discussed thoroughly in both employee orientation and management training programs;

e. When employees are featured in employee handbooks or similar publications for employees, Cleveland State University includes protected veterans and individuals with disabilities.

## **NONDISCRIMINATION**

### **41 CFR Section 60-50.5**

Cleveland State University has designed, implemented, and documented an audit and reporting system that:

- 1) Measures the effectiveness of the affirmative action program.
- 2) Indicates any need for remedial action.
- 3) Determines the degree to which the objectives have been attained.
- 4) Determines whether protected veterans and individuals with known disabilities have the opportunity to participate in all company sponsored educational, training, recreational, and social activities.
- 5) Measures compliance with the affirmative action program's specific obligations.

Where the affirmative action program is found to be deficient, corrective action is taken to bring the program into compliance.

## **NONDISCRIMINATION**

### **41 CFR Section 60-50.5**

Yulanda McCarty-Harris, J.D. has been designated to direct the activities of the affirmative action program. Yulanda McCarty-Harris, J.D. has the full support of Ronald M. Berkman in carrying out the Cleveland State University affirmative action policy. Yulanda McCarty-Harris, J.D. is responsible for:

- 1) Developing policy statements, affirmative action programs, and internal and external communication to include discussions with managers, supervisors, and employees to ensure the policies are followed;
- 2) Advising managers and supervisors that their work performance is evaluated, in part, on the basis of their affirmative action efforts;
- 3) Identifying and discussing with management any problem areas;
- 4) Developing with management solutions for any identified problem areas;
- 5) Serving as a liaison between Cleveland State University and community groups, governmental agencies, and vocational rehabilitation organizations;
- 6) Maintaining an audit and reporting system to monitor the progress of the affirmative action program;
- 7) Informing management of the latest developments in the affirmative action and equal employment opportunity area;
- 8) Serving as a liaison between Cleveland State University and organizations for protected veterans and individuals with disabilities;
- 9) Assisting in career counseling for protected veterans employees and employees with disabilities;
- 10) Ensuring that the policy statement and required posters are posted on bulletin boards and/or electronic postings; and
- 11) Ensuring that employees placed through these policies are not harassed.

## **NONDISCRIMINATION**

### **41 CFR Section 60-50.5**

All personnel involved in recruitment, screening, selection, promotion, discipline, and related processes are trained to ensure the implementation of our commitments made in this affirmative action program.

## **NONDISCRIMINATION**

### **41 CFR Section 60-50.5**

Cleveland State University documents the following computations or comparisons pertaining to applicants and hires on an annual basis, and maintains them for a period of three (3) years:

- 1) The number of applicants who self-identified as protected veterans pursuant to § 60-300.42(a), or who are otherwise known as protected veterans;
- 2) The number of applicants who self-identified as individuals with disabilities pursuant to § 60-741.42(a), or who are otherwise known to be individuals with disabilities;
- 3) The total number of job openings and total number of jobs filled;
- 4) The total number of applicants for all jobs;
- 5) The number of protected veteran applicants hired;
- 6) The number of applicants with disabilities hired; and
- 7) The total number of applicants hired.



