UNC Wilmington
AFFIRMATIVE ACTION PLAN

January 1, 2017 to October 31, 2017

PART 1
WOMEN AND MINORITIES

PART 2
QUALIFIED INDIVIDUALS WITH DISABILITIES AND QUALIFIED PROTECTED VETERANS

Administrative Information

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PART I

UNC WILMINGTON

AFFIRMATIVE ACTION PLAN

for

WOMEN AND MINORITIES
SECTION I

EQUAL EMPLOYMENT OPPORTUNITY POLICY STATEMENT

It is the policy of UNCW to provide equal opportunity in employment for all qualified persons and to prohibit discrimination in employment without regard to race, sex (such as gender, gender identity, marital status, childbirth, and pregnancy), age, color, national origin (including ethnicity), religion, disability, sexual orientation, political affiliation, veteran status, military service member status, genetic information, or relationship to other university constituents. It is also the policy of UNCW to take affirmative action to employ and to advance in employment, all persons regardless of their status as individuals with disabilities or protected veterans.

This affirmative action plan is published in accordance with 41 CFR Part 60-2.10(a)(3), 41 CFR §60-741.44(a) and 41 CFR §60-300.44(a) and is implemented in accordance with the following laws and their amendments: Title VII and Title IX of the Civil Rights Act of 1964; The Equal Pay Act of 1963; Executive Order 11246; the Age Discrimination in Employment Act of 1967; the Rehabilitation Act of 1973, as amended (Section 503); the Americans with Disabilities Act of 1990; the Vietnam Era Veterans’ Readjustment Assistance Act of 1974 (VEVRAA); the Civil Rights Restoration Act of 1988; NC General Statutes Chapters 116 and 126 and Title II of the Genetic Information Nondiscrimination Act of 2008.

UNCW has been and will continue to be an equal opportunity employer. The Reaffirmation of Commitment to Equal Education and Employment Opportunity as well as the Code of the Board of Governors for the University of North Carolina Statement on Equality of Opportunity in the University and the Equal Employment Opportunity Policy are referenced as Exhibits 1 and 2.

In keeping with the Equal Employment Opportunity Policy, UNCW will continue to recruit, hire, train, and promote the most qualified persons without regard to race, sex (such as gender, gender identity, marital status, childbirth, and pregnancy), age, color, national origin (including ethnicity), religion, disability, sexual orientation, political affiliation, veteran status, military service member status, genetic information, or relationship to other university constituents. Similarly, all other personnel matters such as compensation, benefits, transfers, layoffs, UNCW-sponsored training, education, tuition assistance, and related programs will continue to be administered in accordance with University policy. All employment decisions are based on job related standards and must comply with the principles of equal employment opportunity.

Employees and applicants 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, VEVRAA, or any other Federal, State or local law requiring equal opportunity for disabled persons or protected veterans; (3) Opposing any act or practice made unlawful by Section 503, VEVRAA, or implementing regulations in this part or any other Federal, State or local law requiring equal opportunity for disabled persons or protected veterans; or (4) Exercising any other right
protected by Section 503, VEVRAA or implementing regulations in this part.

The Chancellor’s Reaffirmation of Commitment to Equal Education and Employment Opportunity is included as Exhibit 2.

SECTION II

DISSEMINATION OF POLICY

Internal Dissemination

UNCW will continue to make its Equal Employment Opportunity policy known internally by:

1. Posting the Policy Statement on UNCW’s Human Resources website.

2. Ensuring the presence of required EEO posters on its website and throughout UNCW facilities where employees and applicants for employment can see them.


4. Explaining the Policy Statement, the Equality of Opportunity in the University, the Equal Employment Opportunity policy and the Unlawful Workplace Harassment policy in new employee orientation and including them in supervisor and manager training programs.

5. Disseminating this information in relevant training modules, including the UNCW LEAD Program for executive, management, and supervisory personnel, to explain the intent of the policy, the Chancellor’s commitment, and individual responsibilities for effective implementation.

6. Meeting with non-supervisory employees to discuss the Policy Statement, the Equality of Opportunity in the University, the Equal Employment Opportunity policy and/or the Unlawful Workplace Harassment policy, as requested or by identified need.

7. Making current employees aware of the existence of the Affirmative Action Plan and the benefits available to them.

8. Including representation of women and minorities in UNCW print and web publications.
External Dissemination

UNCW will continue to make its Equal Employment Opportunity policy known externally by:

1. Ensuring the terms and conditions of all purchase orders and contracts with subcontractors contain or reference the required EEO clause and other language required by regulations. This document is included as Exhibit 3.

2. Ensuring the presence of required EEO posters on its website.

3. Incorporating the Equal Employment Opportunity clause in all recruitment advertising and job postings.
SECTION III

DESIGNATION OF RESPONSIBILITY

41 CFR §60-2.17(a)

The Associate Vice Chancellor for Human Resources and University EO Officer is the official who has been assigned the responsibility for the implementation of the Affirmative Action Plan for all employees of UNCW. This official has the authority and the resources to ensure effective implementation and reports to the Chancellor, having access to and support of executive management at UNCW in the discharge of EEO/AA responsibilities. The Associate Vice Chancellor for Human Resources and University EO Officer is accountable for compliance with all equal employment opportunity laws and policies, and all UNCW policies and practices with respect to affirmative recruitment, non-discriminatory selection, record keeping, and reporting on compliance activities to the Chancellor.

The Associate Vice Chancellor for Human Resources and University EO Officer is responsible for ensuring:

1. The Affirmative Action Plan is updated annually.

2. The EEO clause and other language required by regulations is incorporated into the State of North Carolina General Contract Terms and Conditions for purchase orders, leases, and contracts.

3. Employment opportunities are posted in accordance with UNCW policy.

4. Recruitment, including affirmative outreach as appropriate, of potential applicants is conducted without regard to race, sex (such as gender, gender identity, marital status, childbirth, and pregnancy), age, color, national origin (including ethnicity), religion, disability, sexual orientation, political affiliation, veteran status, military service member status, genetic information, or relationship to other university constituents.

5. Managers and supervisors at UNCW understand they are responsible for and will be held accountable for making all employment decisions in accordance with UNCW policy and without regard to unlawful factors.

6. UNCW uses only job related criteria for selection for hire, promotion, transfer, training, compensation and all other employment opportunities.

7. The identification of potential problem areas or investigation and response to potential problem areas identified by UNCW employees.

8. The establishment and/or review of organizational EEO goals and objectives.

9. Technical compliance, such as the proper display of EEO/AA posters and EEO/AA policy statements.
10. That UNCW facilities maintained for the use and benefit of its employees are, in fact, desegregated, both in policy and in use, and that facilities are comparable for both sexes.

11. All employees, including minority and female employees, are encouraged to participate in all University-sponsored educational, training, recreational, and social activities.

12. UNCW prohibits and prevents harassment and discrimination of employees on account of race, sex (such as gender, gender identity, marital status, childbirth, and pregnancy), age, color, national origin (including ethnicity), religion, disability, sexual orientation, political affiliation, veteran status, military service member status, genetic information, or relationship to other university constituents.

13. The reporting of any breaches of policy or obstacles to the fulfillment of the above to the appropriate supervisor, up to and including the Chancellor, so that appropriate action to resolve such problems may be managed in accordance with UNCW policy and practice.

14. Offering confidential counseling to both employees and supervisors upon request.

15. Working with hiring managers in outreach and recruiting efforts to develop diverse pools in accordance with affirmative action goals at UNCW.

The Associate Vice Chancellor for Human Resources and University EO Officer also manages UNCW’s Applicant Tracking System (ATS) and implements system capabilities that enhance our ability to strategically capture demographic data and measure the effectiveness of UNCW’s outreach, recruitment marketing, and recruitment and retention-focused initiatives. Additionally, this official focuses on creating new outreach partnerships as one effort to ensure UNCW takes good-faith steps to attract, recruit, and employ staff, specifically underrepresented groups who identify as veterans, individuals with disabilities, minorities and females.

UNCW’s affirmative action plan is reviewed by multiple individuals who strive to ensure information is properly presented, action-oriented goals are realistic and measurable and adhere to federal regulations.

Managers and supervisors are responsible for ensuring the effective implementation of UNCW’s Affirmative Action Plan within their units by:

1. Assisting in the identification of problem areas, formulating solutions, and reviewing process to ensure barriers to equal employment opportunity do not exist.

2. Reviewing the qualifications of all applicants and employees to ensure qualified individuals are treated in a nondiscriminatory manner when hiring, promotion, transfer, and termination actions occur.
3. With the rollout of the new Performance Management Policy, every SHRA manager and supervisor is required to have, as a part of his or her performance plan, the responsibility to comply with EEO laws and policies, and assist in achieving EEO goals established by the agency, department or university.

4. Reviewing the job performance of each employee to assess whether personnel actions are justified based on the employee’s performance of his/her duties and responsibilities.
SECTION IV
IDENTIFICATION OF POTENTIAL PROBLEM AREAS
BY JOB GROUP AND ORGANIZATIONAL UNIT

41 CFR §60-2.17(b) (1)

UNCW has conducted an in-depth analysis of its total employment process to determine whether and where any impediments to equal employment opportunity exist by organizational unit or job group. Included in this analysis are those employment processes that impact both employees subject to the State Human Resources Act (SHRA) and those exempt from the State Human Resources Act (EHRA).

The data used for the Affirmative Action Plan brings new opportunities for updates. UNCW used the 2010 census data to conduct the analysis of its employment and used a variety of other data sources were used for the analysis of this plan.

Potential problems of minority or female utilization by Organizational Unit

While there is no requirement that UNCW perform an availability analysis equivalent to that done under 41 CFR §60-2.14 nor make an incumbency to availability comparison by organizational unit equivalent to that done under 41 CFR §60-2.15, we understand OFCCP to be concerned with whether there are impediments to the utilization/employment of minorities and/or women in any organizational unit. Action-oriented programs to address this utilization issue are discussed in Section VIII.

Potential problems of minority or female distribution/placement by Organizational Unit

We have identified no impediments to equal employment opportunity in the placement of women or minorities in the different jobs in our organizational units. For many years, UNCW’s Affirmative Action Plans have historically shown all organizational units at UNCW to have female and minority representation.
Potential problems of minority or female utilization by Job Group

UNCW has compared the incumbency of minorities and women in each Job Group pursuant to 41 CFR §60-2.15 to determine if the availability for a Job Group is greater than incumbency. The comparison is used to determine if there are any Job Groups in which the percentage of minorities or women employed in the Job Group is significantly less than would reasonably be expected given the availability percentage for that particular Job Group. This year, such situations exist for minorities in the following job groups: Executive/Senior Administrator, Managers, Professionals, Technical/Paraprofessional, Business Faculty, Social Sciences Faculty, Biological Sciences Faculty, and Education Faculty. This year, such situations exist for women in the following job groups: Executive/Senior Administrator, Professionals, Technical/Paraprofessional, Humanities Faculty, and Social Sciences Faculty. UNCW has established placement goals in accordance with 41 CFR §60-2.16 which will be shared with hiring managers when filling such vacancies. The methodology employed in this analysis is discussed in detail in Section X of this Affirmative Action Plan.

Potential problems of minority or female distribution/placement by Job Group:

We have identified no impediments to equal employment opportunity in the placement of women or minorities in the different positions in any Job Group. To the extent a goal has been established for minorities or women in a Job Group, any problem areas will be addressed by our good faith efforts to meet such goal. See also the discussion of action-oriented programs in Section VIII of the Affirmative Action Plan and internal monitoring in Section IX of the Affirmative Action Plan.
SECTION V
IDENTIFICATION OF POTENTIAL PROBLEM AREAS
PERSONNEL ACTIVITY

41 CFR §60-2.17(b) (2)

UNCW has conducted an in-depth analysis of its total employment process to determine whether and where any impediments to equal employment opportunity exist based on its evaluation of HR process. Included in this analysis are those HR processes that impact both employees who are Subject to the State Human Resources Act (SHRA employees) and employees who are Exempt from the State Human Resources Act (EHRA employees).

Applicant Flow

UNCW does not accept unsolicited applications or resumes. Such job seekers are not applicants. We maintain data on all applicants. Applicants of identifiable race, ethnicity, and sex are those who voluntarily complete self-identification information. As a part of the application process, applicants are offered the opportunity to complete the Voluntary Self-Identification of Demographic Information in accordance with the Vietnam Era Veterans’ Readjustment Assistance Act (VEVRAA) as well as the Voluntary Self-Identification of Disability. Records are kept for each selection decision, if any, for which the applicant was considered. This allows us to complete required analyses, by job title, of the selection rates of persons of identifiable race, sex, and ethnic group. These data and analyses are not a part of the written Affirmative Action Plan, but they are collected and will be submitted to OFCCP in response to a request for same during the course of a compliance review.

Furthermore, we regularly compare the percentage of minorities and women who apply, by Job Group, with our estimate of availability for each Job Group. We hope that such a comparison will give us additional information about both the accuracy of our availability estimates and the results of our good faith efforts to invite minorities and women to apply for equal opportunities at UNCW.

Hires, Promotions and Other Personnel Actions

In order to be considered for any opportunity, a job seeker (whether internal or external) must make a timely submission expressing interest in the stated opportunity in the online application form required by UNCW through our applicant tracking system or through a designated search firm. This may be an online application and/or an online resume, depending on the position. In the event an online application is required, it must be electronically signed and completely filled out or it will not be evaluated and no employment decision will be made about that job seeker.
UNCW advertises employment opportunities as required by 41 CFR §60-300.5(a)(2). Positions for which both internal and external applicants may apply are advertised in appropriate media and posted on the UNCW website. Positions that are available only to internal applicants are posted on the UNCW website with an indication that recruitment is limited to current employees of UNCW.

In addition, UNCW records other job changes including “promotion” or “competency/skills” promotions, such as movement from Assistant to Associate Vice Chancellor. These job changes sometimes constitute advancement (with or without change in pay) to an incumbent. There is no fixed “head count” of Assistant Vice Chancellors, for example. Advancement in career progression for one employee does not constitute a “denial” of any opportunity for any other employee.

Similarly, UNCW records, but does not include in an analysis of selections, HR processes, such as reinstatement to the prior job upon return from medical leave (long term or short term), reinstatement or placement as a result of settlement of a grievance, or those transactions that do not involve the selection of one job seeker and the rejection of another or others. Such personnel activities are not “opportunities.”

Based on the business need, UNCW reclassifies employees whose jobs have changed as a result of reorganization, assumption of additional responsibilities, and redistribution of work or learned new competencies (knowledge, skills, and abilities). These reclassifications/career progression adjustments are not from “among” any pool of persons from which we make a selection and they may not be commingled with competitive selections for analytical purposes. Nevertheless, UNCW records and reviews them to ensure that such reclassifications/career progression adjustments are not unlawfully based on race, sex (such as gender, gender identity, marital status, childbirth, and pregnancy), age, color, national origin (including ethnicity), religion, disability, sexual orientation, political affiliation, veteran status, military service member status, genetic information, or relationship to other university constituents.

Terminations

Voluntary Terminations:
There is no “pool” of persons who might choose to terminate employment voluntarily. By definition, such terminations do not involve an employer decision or “selection.” These are, therefore, not susceptible to any statistical analysis of “selection disparities.”

Involuntary Terminations:
There are a variety of reasons for which a person might leave the employment of UNCW other than by choice.

Terminations for cause involve an employer decision. However, there is no “pool” of persons who are considered for termination for poor attendance, for poor performance, or for any of the other reasons a person might be discharged. For example, the only persons who are “considered” for termination for poor attendance are those who do not come to work when
scheduled; the only persons who are considered for termination for poor performance are those who perform poorly. A disparate treatment analysis or “selection rate” cannot be computed except with similarly situated people. However, UNCW does record these events separately by type, and reports them to OFCCP upon request.

There is only one kind of involuntary termination for which UNCW can do an analysis of “selection disparities” as required by this section of the regulations: a reduction in force. Where UNCW abolishes jobs and must make selection decisions about which incumbents will be retained in the remaining jobs, we make such selection decisions without regard to race, sex (such as gender, gender identity, marital status, childbirth, and pregnancy), age, color, national origin (including ethnicity), religion, disability, sexual orientation, political affiliation, veteran status, military service member status, genetic information, or relationship to other university constituents. The Reduction in Force Guidelines used for SHRA employees at UNCW is provided as Exhibit 4. If a reduction in force occurs, we can measure any differences in selection rates to determine if there are statistical indicators of disparate treatment and/or measure the impact of any neutral selection criteria to determine if there is any adverse impact of those criteria. In accordance with the Reduction in Force Guidelines, UNCW completes and submits an SHRA Adverse Impact Analysis to the Office of State Human Resources whenever we have a reduction in force.

Although reduction in force and discharges involve employer choice, other terminations do not. For example, some employees die or do not return, as hoped or expected, from approved leave, such as sick leave, FMLA or short-term or long-term disability leave. Such terminations may not be “voluntary,” to the employee, but they do not involve a decision by this employer. Some terminations are planned for, such as the completion of a temporary assignment or expiration of an employment contract. There is no “selection decision” involved in such circumstances. It would be erroneous to include such terminations in any statistical computation of “selection disparities.” However, UNCW does record these terminations and report them to OFCCP upon request.

Exit interviews with separating employees are conducted by Benefits Counselors through either an in-person interview or through a survey to gather information about their reasons for leaving and share their opinions about working at UNCW.

Analyses of HR processes are required to be accomplished as a part of the contractor’s equal employment opportunity and affirmative action program obligations. However, the regulations do not require that the contractor incorporate such analyses into its written Affirmative Action Plan and we do not. These analyses are, however, submitted to OFCCP in response to a compliance evaluation or complaint investigation as an attachment to the transmittal letter.
UNCW has performed an analysis of its total employment process to determine whether impediments to equal employment opportunity exist. Specifically, to determine if there are gender, race, or ethnicity-based disparities, we have reviewed our compensation systems for both SHRA and EHRA employees.

The following is a summary analysis of the compensation portion of the total employment process:

For all eligible employees, benefits are offered without regard to race, sex (such as gender, gender identity, marital status, childbirth, and pregnancy), age, color, national origin (including ethnicity), religion, disability, sexual orientation, political affiliation, veteran status, military service member status, genetic information, or relationship to other university constituents -- except where sex, age, or ability represent bona fide educational or occupational qualifications or where marital status is a statutorily established eligibility criterion for State funded employee benefit programs.

For SHRA employees, the State of North Carolina has written pay policies and a comprehensive compensation system. These policies and procedures are outlined in policy statements, which are made available to all employees via the UNCW website.

Each SHRA position is assigned to a banded class job family with an associated salary pay band that provides contributing, journey and advanced rates that are competitive with rates in the external labor market consistent with the State’s ability to pay; and proper relationships within State government employment to maintain internal equity. For jobs within each pay structure there is no race-, gender- or ethnicity-based disparities. The current State of North Carolina Career Banding Rates are made available on the UNCW and Office of State Human Resources website.

The establishment of pay bands and the establishment of salary ranges of various breadths provide tools to the State to manage compensation in such a way as to attract and retain qualified employees. While it is typically more expensive for UNCW to attract a new hire than to retain a current employee, these ranges provide sufficient flexibility to meet both the essential needs of the organization and requisite skillsets of the candidates based on industry compensation standards. These standards are followed consistently based on defined pay factors with no decisions based on unlawful considerations. The position and employee competencies within the pay band are based on our pay factors (financial resources, appropriate market rate, internal pay alignment, and required competencies).
All SHRA positions are in the career banding compensation system. As noted in the Career Banding Salary Administration Plan (Exhibit 5), it is the policy of UNCW to compensate its career-banded employees at a level that promotes successful work behavior, emphasizes demonstrated competencies that are linked to organizational goals, reinforces high standards of performance, and maintains the labor market competitiveness necessary to recruit, retain, and develop a competent and diverse work force.

Decisions affecting compensation are made consistently based on state policy without regard to race, sex (such as gender, gender identity, marital status, childbirth, and pregnancy), age, color, national origin (including ethnicity), religion, disability, sexual orientation, political affiliation, veteran status, military service member status, genetic information, or relationship to other university constituents.

For EHRA employees, salary ranges are established in accordance with the UNC Policy Manual. College and University Professional Association for Human Resources (CUPA-HR) data is used for those positions for which sufficient data is available. Positions not identified with CUPA-HR data are slotted based on equity comparison analysis and review. Salaries for other EHRA employees are established based on market and equity factors. These ranges are reviewed annually and may be adjusted on the basis of peer institution comparison.

**Starting Pay**

The following variables affect the setting of starting salary for any position:

1. Financial Resources – UNCW business need (budget)
2. Appropriate Market Rate – Market rate guidelines/market reference rate guidelines and related market information & market dynamics
3. Internal Pay Alignment – Internal pay alignment (equity) and total compensation
4. Required Competencies – minimum qualifications for class; knowledge, skills & competencies; related education & experience; duties and responsibilities; and training, certifications & licenses

NOTE: This list includes variables that, acting collectively and simultaneously, typically determine pay. Of course, this does not mean that there is any “formula” with, for example, relevant education accounting for X% of current compensation or prior experience accounting for X% of current compensation. These variables do not operate independently, nor do they operate in the same fashion for each and every job. However, typically each variable will play a role in determining initial pay for most, if not all jobs. In addition, there may be other job-related variables affecting compensation (either starting pay or post-employment) depending on the specific position. Most of our positions are State funded; thus, restrictions imposed by the legislature and the Office of State Budget and Management may impact our ability to set salaries (either starting pay or post-employment) of both SHRA and EHRA employees.
**At Promotion**

There are two types of promotion for both SHRA and EHRA employees. The first type involves “reclassification/career progression adjustment” for SHRA employees, or job change for EHRA employees, as the employee assumes greater responsibilities as a result of demonstrating superior abilities/competencies. All such promotions are recommended by the employee’s supervisor, who also makes recommendations for promotional increases.

The second type of promotion is “competitive,” where an employee moves into a vacant SHRA or EHRA job or a newly created position. In that case, the new salary of the individual is impacted by the same variables as those described above in the case of a new hire. In addition, there are certain limitations imposed by State policy on the size of promotional increases for SHRA employees. These competitive events are consistently reviewed by the Human Resources department to ensure internal equity.

Vacant jobs are posted in accordance with our posting policy and incumbent employees may apply to be considered for any vacancy.

Reorganizations may occur within the organizational structure; staffing changes pursuant to such reorganization may be either competitive or non-competitive.

**Legislative increases**

Salary adjustments, if granted, are typically made at the end of the fiscal year as determined by the North Carolina General Assembly.

Legislative increases for EHRA and SHRA employees are provided by the North Carolina General Assembly, which determines each year whether the increase, if any, is awarded across the board or based on performance.

UNCW has carefully reviewed all elements of its compensation system; none produce disparities among similarly situated employees on account of race, sex (such as gender, gender identity, marital status, childbirth, and pregnancy), age, color, national origin (including ethnicity), religion, disability, sexual orientation, political affiliation, veteran status, military service member status, genetic information, or relationship to other university constituents.

UNCW similarly has reviewed promotional increases, both competitive and non-competitive, and found no selection disparities based on unlawful factors.
As part of UNCW’s ongoing self-audit to identify problems or potential problems, we have conducted an in-depth analysis of the HR procedures component of the total employment process. Included in this analysis are those employment processes that impact both SHRA and EHRA employees.

**Requests to Hire, Position Descriptions and Job Specifications**

For SHRA positions, our recruitment processes are governed by our Merit-Based SHRA Recruitment and Selection Plan, which is included as Exhibit 6. The recruitment and selection process is managed in the online PeopleAdmin system. Guidelines are available to supervisors via the website. Approvals are obtained through the online system before posting any new or vacant SHRA position. Under the guidance of the Director of Employment and Compensation, Employment Consultants are responsible for contacting the hiring supervisor to carefully review the job specifications before posting, to ensure that they are congruent with State specifications, the written position description on file, and are otherwise job related.

For EHRA positions, the instructions and forms necessary to initiate the recruitment process are readily available to supervisors via the web. Like the SHRA positions, the recruitment and selection process is managed in the online PeopleAdmin system. Approvals are obtained through the online system for any new or vacant EHRA position. The Employment Consultant in the Department of Human Resources is responsible for contacting the hiring supervisor to carefully review the job specifications before posting to ensure that they are congruent with the job responsibilities and are otherwise job related.

All EHRA and SHRA position descriptions are reviewed as positions become vacant and/or changes are made where necessary to accurately reflect current job duties. These position descriptions establish job-related and non-discriminatory requirements.

There are no job titles that could be perceived as evidencing a preference for one gender or another.

**Selection Procedures**

Applicants for posted opportunities may be either internal employees or jobseekers not currently employed by UNCW. The selection of employees for SHRA positions is governed by the Merit-Based SHRA Recruitment and Selection Plan.
Applicants for SHRA positions must submit an online application form. Applicants for EHRA positions complete an online EHRA Application and are required to submit an online letter of interest and a resume.

Applications for SHRA and EHRA positions are electronically submitted into the online HR system. Applications are forwarded to the hiring official and/or search committee for consideration after the posted deadline and HR review. The hiring official does not have access to information on the race, sex or ethnicity, or age of the applicants.

The hiring official, with or without the search/screening/selection committee, reviews the online applications and selects the most qualified applicants to interview.

**Internal Applicant Procedures**

Internal applicants may apply for a lateral transfer, promotion, or even demotion if this is the desire of the internal applicant.

1. An employee may be transferred involuntarily in the case of a departmental reorganization or as management deems best to meet the needs of UNCW.
2. If an employee is interested in a lateral move to the same level position in another division or any other sort of change in his or her job, she or he must apply for and be selected for a posted position, in competition with all other applicants for the opportunity.
3. All employees, including women and minorities, are encouraged to take advantage of the opportunity to apply.
4. Hiring supervisors are encouraged, but not required, to interview any internal applicants who meet the minimum qualifications for a position.
5. Selections are made on the basis of competencies (knowledge, skills, and abilities) without regard to race, sex (such as gender, gender identity, marital status, childbirth, and pregnancy), age, color, national origin (including ethnicity), religion, disability, sexual orientation, political affiliation, veteran status, military service member status, genetic information, or relationship to other university constituents.

We have determined that there are no impediments to equal opportunity in these practices.

Employees also may be promoted non-competitively. For SHRA employees this typically comes about as a result of reclassifying the position that the employee holds. This reclassification/career progression adjustment may occur as a result of the employee learning new competencies of the job, taking on more responsibility, and/or performing better over time. Or it may come about as the result of the employee assuming some or all of another employee’s duties as a result of a reduction in force, hiring freeze, or reorganization. It would be inappropriate to
competitively recruit in these situations, as there is no real “vacancy” or opportunity for anyone but the incumbent.

However, we recognize that such ad hoc transitions might operate, intentionally or unintentionally, to the advantage of one group over another. Consequently, we are especially careful to monitor these transactions to ensure there are no disparities based on race, sex or ethnicity. See our discussion of internal auditing and reporting at Section IX of this Affirmative Action Plan.

EHRA employees may also be promoted based on assuming higher level duties. These transactions do not involve a selection of one employee over another.

UNCW has evaluated its promotion procedures to determine whether they operate as impediments to equal employment opportunity. Our promotion procedures do not discriminate on the basis of race, sex (such as gender, gender identity, marital status, childbirth, and pregnancy), age, color, national origin (including ethnicity), religion, disability, sexual orientation, political affiliation, veteran status, military service member status, genetic information, or relationship to other university constituents.
SECTION VIII

ACTION-ORIENTED PROGRAMS

41 CFR §60-2.17(c)

Job Group Programs

UNCW has thirteen job groups: Executive/Senior Administrators; Managers; Professionals; Office Staff/Clerical; Technical/Paraprofessional; Skilled Craft; Service/Maintenance; Business Faculty; Humanities Faculty; Social Sciences Faculty; Computer Science & Math Faculty; Biological Sciences Faculty; and Education Faculty. Of these job groups three currently have been identified as having fewer women than that which would reasonably be expected based on their apparent availabilities. Seven job groups have been identified as having fewer minorities than that which would reasonably be expected based on their apparent availabilities. Responsive goals, equal to availability, have been set. The methodology for this computation and the identification of Job Groups with goals is set out in Section X of this Affirmative Action Plan.

As we have refined our job groups from last years’ total of 29 to thirteen for more meaningful relativities, we are not able to provide direct analysis on a group-by-group basis. For our overall employee population, as of October 31, 2017, UNC Wilmington had 2,004 employees, of whom 1,150 (57.4%) were women and 400 (20%) were racial/ethnic minorities (Table 1). Although the total number of employees increased when compared to January 1, 2017, the representation of women remained similar to the prior year and representation of racial/ethnic minorities increased by about 1%.

In October 2017, two faculty groups and one staff group reflected an under-representation of women and three faculty groups and four staff groups reflected an under-representation of racial/ethnic minorities. By comparison, in January 2017, ten faculty groups and six staff groups reflected an under-representation of women and ten faculty groups and ten staff groups reflected an under-representation of racial/ethnic minorities.

The representation of women and racial/ethnic minorities among UNCW job groups is summarized and graphically displayed in the following pages. The overall change from January 2017 to October 2017 shows an increase by count in the workforce of 82 employees and an increase in women (+44) and an increase in racial/ethnic minorities (+30).

We will continue to encourage that all job openings be widely posted and that recruitment efforts include appropriate sources that are likely to enhance the number of women and minorities who apply. We will make arrangements with each such source to receive notices of our openings as they occur, along with information on our application process and deadline requirements.

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1 The 2017 Plan year was amended to end on October 31, 2017.
2 The Chancellor is excluded from this count as he is included in System Office calculations.
3 The 2017 Plan was amended to reduce the number of faculty classes from 16 to six.
Organizational Unit Programs

Deans, department chairs, directors, and other hiring officials are responsible for working toward the balanced representation of racial/ethnic minorities and women within the workforce and the elimination of barriers to equal employment opportunities for persons with disabilities.

Hiring officials determine vacancy-specific qualifications required for entry to the position (in addition to any state required minimum qualifications) and desired for full performance in the position (preferred qualifications). They ensure advertisements for the position reasonably describe principal duties to be performed and cite both minimum and preferred qualifications. Hiring officials recruit a pool of qualified candidates with good-faith efforts to ensure racial, ethnic, and gender diversity; all while ensuring that the screening and selection process is free from bias related to race, sex (such as gender, gender identity, marital status, childbirth, and pregnancy), age, color, national origin (including ethnicity), religion, disability, sexual orientation, political affiliation, veteran status, military service member status, genetic information, or relationship to other university constituents -- except where sex, age, or ability represent bona fide occupational qualifications.

Further, the hiring official will select, hire, place, train, and promote persons in all employment categories without regard to race, sex (such as gender, gender identity, marital status, childbirth, and pregnancy), age, color, national origin (including ethnicity), religion, disability, sexual orientation, political affiliation, veteran status, military service member status, genetic information, or relationship to other university constituents -- except where sex, age, or ability represent bona fide occupational qualifications. The hiring official selects the candidate for hire from the pool of the most qualified applicants for employment based upon job related qualifications using fair and valid selection criteria.

All selection decisions and hiring salaries are contingent on approval by the EEO/AA officer (or designee) for conformance to UNC Wilmington's EEO/AA Plan. SHRA positions require approval by the Chancellor. EHRA positions require approval by the provost for faculty positions, and Chancellor for administrative, instructional and research positions. These approvals are managed through the hiring process overseen by Human Resources representatives who provide the authorization to offer once all approvals have been received. Hiring officials are not authorized to offer positions prior to receiving notification through an authorization to offer.

UNCW will continue to encourage that all job openings be widely posted and that recruitment efforts include appropriate sources that are likely to enhance the number of women and minorities who apply. We will make arrangements with each such source to receive notices of our openings as they occur, along with information on our application process and deadline requirements.

Compensation Systems

We will continue to use the Career Banding Compensation System for our SHRA positions as designated by the NC Office of State Human Resources in the Affirmative Action Plan year.
HR Procedures

To assist managers in screening applications and selecting the most qualified applicants for interviews, Human Resources has developed a set of guidelines that are available to hiring supervisors via the UNCW website. These guidelines cover such topics as application review, preparing for the interview, conducting the interview, checking references and EEO overview. The manager also has an opportunity when creating a job posting to include questions related to required education, knowledge, skills and abilities for the applicants to answer. These questions/answers can be used as a screening tool to determine most qualified candidates. Personnel actions follow University and OSHR Grievance and Disciplinary policies, and are free from adverse impact.
The EEO Officer or Delegate is responsible for the design and implementation of the auditing and reporting system. The EEO Officer or Delegate audits HR processes on an annual basis in order to measure the effectiveness of the Affirmative Action Plan. The following actions are keys to the auditing and reporting system:

1. Monitoring of all HR processes, including referrals, placements, transfers, promotions, terminations, and compensation, at all levels to ensure the nondiscrimination policy is carried out;

2. Sharing/reviewing report results with all levels of management;

3. Advising top management of program effectiveness and submitting recommendations to improve unsatisfactory performance.
UNCW herein describes the methodology employed with respect to all analyses and actions required by 41 CFR §§60-2.11, -2.12, -2.13, -2.14, -2.15 and -2.16. In addition, we have annotated the EEO herein as required by 41 CFR §60-2.1(d).

Organizational Profile

UNCW has elected to prepare a Work Force Analysis Summary (Exhibit 7) in accordance with 41 CFR §60-2.11(b). Specifically, the Work Force Analysis Summary identifies the name of each organizational unit; the total number of male and female incumbents; and the total number of male and female incumbents in each of the following groups: American Indian or Alaska Native, Asian, Black or African American, Hispanic or Latino, Native Hawaiian/Other Pacific Islander, White or 2 or More.

This Work Force Analysis Summary includes 2,006 employees as of October 31, 2017.

“Lines of Progression”

Although the regulations call for identification of “Lines of Progression,” such an approach typically occurs in unionized settings or in other very structured operations, there are no formal “Lines of Progression” for positions in this Plan. To the extent that there is a usual “promotional sequence,” it is taken into account in establishing feeder Job Groups in the Availability Analysis. These “career ladders” can be easily identified in the EEO numerical analyses by designations such as “Administrative Support Associate to Administrative Support Specialist”. Within Career Banding, as employees progress and learn new competencies, they can progress within the pay band from contributing to journey to advanced pay levels.

Job Group Analysis

In accordance with 41 CFR §60-2.12(b), UNCW has combined all job titles into Job Groups, grouping them by similarity of wages, content and opportunity. There are 2,004 employees in this analysis and there are thirteen Job Groups.

As required, the Job Group Summary displays the number of total, female, and minority employees in each job title in the Job Group (Exhibit 8).

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4 Two employees were not included in the final census count, one who separated but was not excluded in the October 31 census and the other being the Chancellor, who is counted with System Office census.
The following is a list of the Job Groups for this Affirmative Action Plan:

**Executive, Senior Administrators**
This job group includes the highest level positions in our organization. These positions have responsibility for setting broad UNCW-wide policies and directing divisions within our organization. Most positions in this group require an advanced degree and significant experience. This group includes titles such as Chancellor, Vice Chancellor, Associate Vice Chancellor, Assistant Vice Chancellor, Secretary of the University, and Executive Director.

**Managers**
This job group includes a variety of titles and classifications requiring management expertise as evidenced by highly significant experience in the respective field and preferably an advanced degree and several years of applicable experience. These positions have significant decision-making responsibilities and typically report to one of the highest level positions within the Division. This group includes titles such as Director of Benefits and Salary Administration, Director of Physical Plant, and Accounting Manager.

**Professionals**
This job group includes a variety of titles and classifications requiring professional expertise as evidenced by significant experience in the respective field and a minimum of a bachelor’s degree. These positions have considerable decision-making responsibilities and function with a high level of autonomy. This group includes titles such as Accountant, HR Consultant, Networking Analyst, Staff Attorney, and Senior Research Analyst.

**Office/Clerical Staff**
This job group includes all clerical/secretarial related positions whose work is primarily governed by prescribed guidelines and procedures. These positions typically require a high school diploma and minimum of one, two or three years of related experience. This group includes titles such as Administrative Support Associate, Administrative Support Supervisor and Administrative Support Specialist.

**Technical/Paraprofessional**
This job group includes a variety of titles and classifications typically requiring a two-year degree and/or several years of related experience. These positions typically have an area of expertise/specialty and may or may not have guidelines and reference manuals readily available with which to consult. This group includes titles such as University Program Associate, Multi-Media Technician, Purchasing Specialist, Visual Arts Specialist, and Property Security Officer.
Skilled Craft
This job group includes a variety of titles and classifications including, but not limited to, electrical, HVAC, plumbing, welding, cabinetmaking, carpentry, locksmith, masonry, painting, plastering and roofing that perform a variety tasks ranging from routine and unskilled to highly skilled. These positions typically require a minimum of graduation from high school or equivalent. Experience in the trade(s) areas related to the position’s role usually may be substituted on a year for year basis. These positions include Specialty Trades Technician, Vehicle/Equipment Operator, Building Environmental Supervisor, Facility Maintenance Supervisor, and Electronics Specialist.

Service/Maintenance
This job group includes a variety of titles and classifications whose work may have a service/administrative/ facilities role and/or a specialized maintenance role. These positions may require graduation from high school or equivalent and related experience. This group includes such titles as Building Environmental Services Technician and Support Services Associate.

Business Faculty
This job group includes non-tenured and tenure-track appointments in academic departments including such disciplines as Accountancy, Economics and Finance, Marketing, and Information Systems and Operations Management.

Humanities Faculty
This job group includes non-tenured and tenure-track appointments in academic departments including such disciplines as English, World Languages and Cultures, Creative Writing, Film Studies, and History.

Social Sciences Faculty
This job group includes non-tenured and tenure-track appointments in academic departments including such disciplines as Communication Studies, Psychology, Sociology & Criminology, and Anthropology.

Computer Sciences and Math Faculty
This job group includes non-tenured and tenure-track appointments in academic departments including such disciplines as Mathematics and Statistics and Computer Science.

Biological Sciences Faculty
This job group includes non-tenured and tenure-track appointments in academic departments including such disciplines as Earth and Ocean Sciences, Chemistry, Physics and Physical Oceanography, and the School of Nursing.

Education Faculty
This job group includes non-tenured and tenure-track appointments in academic departments including such disciplines as Elementary, Middle and Literacy, Secondary Education, and Educational Leadership.
Availability Analysis

Consistent with regulatory requirements, UNCW has separately determined the availability of minorities and women for each Job Group. 41 CFR §60-2.14(b)]

UNCW has considered two factors for minorities and two factors for women: the percentage of minorities or women with requisite skills in the reasonable recruitment area; and the percentage of minorities or women among those promotable, transferable and trainable in the current workforce. 41 CFR §60-2.14(c) These data are presented in Factor Availabilities (Exhibit 9).

UNCW has used the most current and discrete statistical information available to derive external availability data. In an effort to estimate availability as accurately as possible, UNCW uses the 2010 census data (the most current available at this time) for occupational classifications for its reasonable recruiting areas. In determining “requisite skills,” UNCW has identified those Standard Occupational Classifications (SOCs) reported in the Census that were most representative of the skills required for the positions being analyzed. 41 CFR §60-2.14(d)

The reasonable recruiting area for each Job Group 41 CFR §60-2.14(e) is as follows:

The United States for Job Group:
- Executive
- Senior Administrators
- Faculty

North Carolina for Job Groups:
- Managers
- Professionals

The Wilmington Metro Area for Job Groups:
- Technical/Paraprofessional
- Office/Clerical Staff
- Service/Maintenance
- Skilled Crafts

These reasonable recruitment areas have not been drawn in such a way to effectively exclude minorities or women. In each case the reasonable recruiting area was drawn based on the actual experience of UNCW in attracting applicants. Higher level jobs demand wider searches and a willingness to pay relocation costs. Lower level jobs, or jobs for which there is ample local availability, are not appropriate for state-wide recruitment efforts since UNCW does not pay relocation costs and job seekers outside the Wilmington Metro area are typically not willing to relocate at their own expense for jobs in these pay ranges. 41 CFR §60-2.14(e)

UNCW is committed to a policy of upward mobility for all employees in accordance with university need and employee interest. Internal availability is a significant source of workers for
many Job Groups. Promotions can and do occur within any Job Group and the estimated frequency of movement into the Job Group determined the value weight for Internal Availability in our computations. At any given time the population of a “feeder” Job Group might include those individuals newly hired/promoted or on probation or with less seniority or otherwise not necessarily “promotable” for every vacancy. However, for purposes of EEO availability estimates only, all individuals in the feeder jobs were counted as “promotable, transferable and trainable” as discussed above. 41 CFR §60-2.14(f)

For each Job Group we considered which factor or factors represented a genuine source of available workers for the Job Group during the Affirmative Action Plan Year, and with what frequency the factor(s) could be expected to represent availability, that is, how often we expect to fill vacancies externally (whether locally, from a state-wide, or national recruitment) or from within. The feeder Job Groups that were used are identified in Factor Availabilities (Exhibit 9). We then weighted each factor in accordance with these judgments and computed our final estimate of availability using any factor(s) having a weight greater than “zero.” These data are provided in Availability Analysis (Exhibit 10). Census data, which serve as a proxy for “requisite skills,” were “weighted” in accordance with the significance of each to the Job Group based on the number of positions in the Job Group requiring such skills. 41 CFR §60-2.14(g)

Comparing Incumbency to Availability

Comparing incumbency to availability, pursuant to 41 CFR §60-2.15(b), UNCW is required to establish a goal in any Job Group having fewer women or minorities than might reasonably be expected given their availability. An appropriate measure of “reasonably expected” is statistical probability: that is, if the difference between availability and actual participation is statistically significant, the current incumbency is not “reasonably expected.” We have used an appropriate test of statistical significance, relying on the standard for measuring “reasonably expected” approved by the court in Firestone Tire & Rubber Co., Inc. v. Marshall, 507 F. Supp. 1330, 24 FEP 1699 (Eastern District of Texas, 1981, upholding the decision of the Administrative Law Judge) as well as many other federal courts.

The circumstances under which a placement goal must be established are: when the difference between incumbency and estimated availability is so large as not to be “reasonably expected.” OFCCP makes clear its expectation that contractors may use a number of ways to measure “reasonably expected,” including statistical significance. Because statistical significance is the interpretation of “reasonably expected” made by the court in Firestone Tire & Rubber Co., Inc. v. Marshall, we have adopted such a standard in the comparison of incumbency to availability in our EEO. The measure of statistical significance approved by the Firestone court, as well as many other federal courts, is standard deviation analysis.

We have determined statistical probability using standard deviation analysis and have set a goal wherever the difference between availability and incumbency was 2.0 standard deviations or more, see Incumbency verses Estimated Availability (Exhibit 11).
Placement Goals by Job Group

In the 2018 Affirmative Action Plan for UNCW, there are eight (8) Job Groups in which a placement goal for minorities exists (Exhibit 12), and five (5) Job Groups in which a placement goal for women exists. These placement goals are established and good faith efforts will be made to accomplish them, in accordance with 41 CFR §60-2.16. We will explore ways to develop pipelines, retain, and recruit qualified women and minorities in those classifications.

<table>
<thead>
<tr>
<th>Job Group and Category</th>
<th>2018 Goal Females $^5$</th>
<th>2018 Goal Minority $^5$</th>
<th>2017 Incumbents Females</th>
<th>Minority</th>
<th>Parity with Availability</th>
<th>Parity with Availability</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Total</td>
<td>#</td>
<td>%</td>
<td>#</td>
<td>%</td>
<td>Women</td>
</tr>
<tr>
<td>1: Executive and Senior Administrators</td>
<td>8</td>
<td>2</td>
<td>33</td>
<td>10</td>
<td>30.3%</td>
<td>4</td>
</tr>
<tr>
<td>3: Managers</td>
<td>12</td>
<td>168</td>
<td>97</td>
<td>21</td>
<td>12.5%</td>
<td>Yes</td>
</tr>
<tr>
<td>4: Professionals</td>
<td>38</td>
<td>38</td>
<td>376</td>
<td>230</td>
<td>61.2%</td>
<td>40</td>
</tr>
<tr>
<td>5: Office Staff/Clerical</td>
<td>321</td>
<td>286</td>
<td>89.1%</td>
<td>75</td>
<td>23.4%</td>
<td>Yes</td>
</tr>
<tr>
<td>6: Technical/Paraprofessional</td>
<td>52</td>
<td>20</td>
<td>218</td>
<td>124</td>
<td>56.9%</td>
<td>31</td>
</tr>
<tr>
<td>7: Skilled Crafts</td>
<td>78</td>
<td>8</td>
<td>10.3%</td>
<td>15</td>
<td>19.2%</td>
<td>Yes</td>
</tr>
<tr>
<td>8: Service/Maintenance</td>
<td>142</td>
<td>61</td>
<td>43%</td>
<td>86</td>
<td>60.6%</td>
<td>Yes</td>
</tr>
<tr>
<td>9: Business Faculty</td>
<td>9</td>
<td>87</td>
<td>33</td>
<td>13</td>
<td>14.9%</td>
<td>Yes</td>
</tr>
<tr>
<td>10: Humanities Faculty</td>
<td>16</td>
<td>165</td>
<td>70</td>
<td>37</td>
<td>22.4%</td>
<td>Yes</td>
</tr>
<tr>
<td>11: Social Sciences Faculty</td>
<td>6</td>
<td>9</td>
<td>105</td>
<td>58</td>
<td>55.2%</td>
<td>14</td>
</tr>
<tr>
<td>12: Comp Sci &amp; Math Faculty</td>
<td>43</td>
<td>15</td>
<td>34.9%</td>
<td>18</td>
<td>41.9%</td>
<td>Yes</td>
</tr>
<tr>
<td>12: Biological Sciences Faculty</td>
<td>7</td>
<td>204</td>
<td>114</td>
<td>33</td>
<td>19.8%</td>
<td>Yes</td>
</tr>
<tr>
<td>13: Education Faculty</td>
<td>4</td>
<td>64</td>
<td>44</td>
<td>13</td>
<td>20.3%</td>
<td>Yes</td>
</tr>
</tbody>
</table>

Overall Activity

Whether there is a placement goal or not, our objective for every organizational unit, is to continue to take action to ensure that our employment practices are non-discriminatory.

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$^5$ The 2017 Plan was amended to reduce the number of faculty classes from 16 to six, therefore 2016 Placement Goals are not measured by group due to change in methodology.

$^6$ The 2017 Plan was amended to reduce the number of faculty classes from 16 to six, therefore 2016 Placement Goals are not measured by group due to change in methodology.
PART II

UNCW
AFFIRMATIVE ACTION PLAN

for

QUALIFIED INDIVIDUALS WITH DISABILITIES AND
QUALIFIED PROTECTED VETERANS
SECTION I
INSPECTION OF THIS AFFIRMATIVE ACTION PLAN

41 §CFR 60-741.41
41 §CFR 60-300.41

The full Affirmative Action Plan for qualified individuals with disabilities and qualified protected veterans shall be available for inspection by any applicant or employee on the UNCW website. The plan is also available for inspection at the UNCW Division of Human Resources. (Exhibit 16)
SECTION II

PERSONS COVERED BY THIS AFFIRMATIVE ACTION PLAN

41 CFR §60-741.2
41 CFR §60-300.2

Some Important Definitions

UNCW is a government contractor subject to the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended by the Jobs for Veterans Act of 2002, 38 U.S.C. 4212 (VEVRAA) and Section 503 of the Rehabilitation Act (Section 503). As such, UNCW is required to take affirmative action to employ and advance in employment: (1) disabled veterans; (2) recently separated veterans; (3) active duty wartime or campaign badge veterans; and (4) Armed Forces service medal veterans. These classifications are defined as follows:

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

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

- **Disability** with respect to an individual means (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.

- **Disabled veteran** is one of the following: (1) A veteran of the U.S. military, ground, naval or air service who is entitled to compensation (or who but for the receipt of military retired pay would be entitled to compensation) under laws administered by the Secretary of Veterans Affairs; or (2) A person who was discharged or released from active duty because of a service-connected disability.

- **Qualified Individual** means a person who satisfied 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.

- **Reasonable Accommodation** means modifications or adjustments to a job application process to enable a qualified applicant with a disability to be considered for the position such applicant desires, or to the work environment, or to the manner or circumstances under which the position held or desired is customarily performed, that enable a qualified individual with a disability to perform the essential functions of that position; or that enable the employee with
a disability to enjoy equal benefits and privileges of employment as are enjoyed by the contractor’s other similarly situated employees without disabilities.

- **Recently separated veteran** means any veteran during the three-year period beginning on the date of such veteran's discharge or release from active duty in the U.S. military, ground, naval, or air service.
SECTION III

INVITATION TO SELF-IDENTIFY

41 CFR §60-741.42
41 CFR §60-300.42

Through the application for employment process, each applicant is invited to identify whether he or she might be covered by the Rehabilitation Act or Vietnam Era Veterans Readjustment Assistance Act. The form of the invitation to self-identify is as prescribed by the regulations. The invitation states that the information is voluntary and will be kept confidential and will be used in a manner consistent with law.

At time of hire, new employees are also invited to self-identify during orientation. All UNCW employees are reminded at least annually to identify themselves as being covered by the Rehabilitation Act or Vietnam Era Veterans Readjustment Assistance Act.

UNCW will maintain a separate file on persons who have self-identified and will provide that file to the OFCCP upon request.

As a Government contractor, UNCW must reach out to, hire, and provide equal opportunity to qualified people with disabilities in accordance with Section 503 of the Rehabilitation Act of 1973 as amended. As such, applicants and new employees are invited to tell us if they have a disability or if they ever had a disability. Completion is voluntary and any answers given will be kept confidential as required by law and will not be used against the applicant or employee in any way. Employees who become disabled at any time are offered the opportunity to self-identify as having a disability without fear of any punishment because they did not identify as having a disability earlier.

Applicants/employees are considered to have a disability if they have a physical or mental impairment or medical condition that substantially limits a major life activity, or if they have a history or record of such an impairment or medical condition.
SECTION IV

EQUAL EMPLOYMENT OPPORTUNITY POLICY STATEMENT

41 CFR §60-741.44(a)
41 CFR §60-300.44(a)

It is the policy of UNCW to provide equal opportunity in employment for all qualified persons and to prohibit discrimination in employment because of race, color, religion, sex, sexual orientation, gender identity, national origin, age, disability, genetic information, or protected veteran status. It is also the policy of UNCW to take affirmative action to employ and to advance in employment, all persons regardless of their status as individuals with disabilities or protected veterans.

This affirmative action plan is published in accordance with 41 CFR Part 60-2.10(a)(3), 41 CFR §60-741.44(a) and 41 CFR §60-300.44(a) and is implemented in accordance with the following laws and amendments: Title VII and Title IX of the Civil Rights Act of 1964; The Equal Pay Act of 1963; Executive Order 11246; the Age Discrimination in Employment Act of 1967; the Rehabilitation Act of 1973, as amended (Section 503); the Americans with Disabilities Act of 1990; the Vietnam Era Veterans’ Readjustment Assistance Act of 1974 (VEVRAA); the Civil Rights Restoration Act of 1988; NC General Statutes Chapters 116 and 126 and Title II of the Genetic Information Nondiscrimination Act of 2008.

UNCW has been and will continue to be an equal opportunity employer. The Code of the Board of Governors for the University of North Carolina on Equality of Opportunity in the University and the Equal Employment Opportunity Policy are included in Exhibit 1.

In keeping with this policy, UNCW will continue to recruit, hire, train, and promote the most qualified persons without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, age, disability, genetic information, or veteran status. Similarly, all other personnel matters such as compensation, benefits, transfers, layoffs, UNCW-sponsored training, education, tuition assistance, and related programs will be administered in accordance with University policy. All employment decisions are based on job related standards and must comply with the principles of equal employment opportunity.

Employees and applicants 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, VEVRAA, or any other Federal, State or local law requiring equal opportunity for disabled persons or protected veterans; (3) Opposing any act or practice made unlawful by Section 503, VEVRAA, or implementing regulations in this part or any other Federal, State or local law requiring equal opportunity for disabled persons or protected veterans; or (4) Exercising any other right protected by Section 503, VEVRAA or implementing regulations in this part.

The Chancellor’s Statement of Commitment to Affirmative Action and Equal Employment
Opportunity is included as Exhibit 2.
SECTION V
INTERNAL DISSEMINATION OF POLICY

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

UNCW will disseminate this EEO/AA Policy internally in the following ways:

1. UNCW’s Affirmative Action Plan is posted on the website.

2. UNCW periodically informs all employees of its commitment to engage in action to increase employment opportunities for qualified individuals with disabilities and qualified protected veterans during training programs such as LEAD and other recruitment and training modules. This may include individual instruction to hiring managers when filling vacant positions.

3. UNCW’s Affirmative Action Policy is reviewed in new employee orientation and in management training programs.

4. The Affirmative Action Plan for employees with disabilities and protected veterans is available on the UNCW website. The plan is also available for inspection at the Division of Human Resources.
UNCW enlists the assistance and support of recruiting resources that may refer qualified individuals with disabilities and qualified protected veterans for employment opportunities with UNCW, such as the Division of Employment Security and/or NC Vocational Rehabilitation Services.

UNCW has its plan on the website which is available to all constituencies. The plan is also available for inspection at the Division of Human Resources.

UNCW posts all open jobs on the website.

Media advertisements and other recruiting communications carry the label line: UNC Wilmington actively fosters a diverse and inclusive working and learning environment and is an equal opportunity employer. Qualified persons from all racial, ethnic or other minority groups, protected veterans, and individuals with disabilities are strongly encouraged to apply.
The Chancellor of the University of North Carolina Wilmington has overall responsibility for the Affirmative Action Plan for UNCW. The Associate Vice Chancellor for Human Resources and University Equal Opportunity Officer is designated as the EEO/AA Director and is responsible for implementing, monitoring, and administering the Affirmative Action Plan for all Divisions as follows:

1. Develop policy statements, Affirmative Action Plans, and internal and external communication techniques, including discussions with managers, supervisors, and employees to ensure that UNCW policy is being followed.

2. Identify problem areas in the implementation of the Affirmative Action Plan in conjunction with management, and develop solutions.

3. Design and implement audit and reporting systems.

4. Serve as liaison between UNCW and enforcement agencies.

5. Serve as liaison between UNCW and organizations by and for disabled workers, and all veterans covered by this Affirmative Action Plan.

6. Keep management informed of the latest developments in the affirmative action area.

7. Arrange for career counseling as requested by known disabled workers and all veterans covered by this Affirmative Action Plan.

8. Ensure that supervisors and employees are made aware of UNCW’s Unlawful Workplace Harassment Policy.
SECTION VIII

EEO AND AFFIRMATIVE ACTION TRAINING

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

UNCW is committed to providing training to all personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes to ensure that the commitments in UNCW Affirmative Action Plan are carried out.

The Division of Human Resources at UNCW is also committed to providing training and development tools, resources, online tutorials, and workshops to support employees with their learning needs and promote professional growth and career development. These continuous learning opportunities can be found on the Human Resources website under Training & Talent Development. UNCW works with OSHR to ensure all SHRA supervisors are offered and attend EEODF or other OSHR approved diversity program training within the first year of employment as a supervisor.
SECTION IX
REVIEW OF PERSONNEL PROCESSES
PROPER CONSIDERATION OF QUALIFICATIONS

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

UNCW reviews its employment procedures at least annually to ensure careful, thorough, and systematic consideration of the job qualifications of applicants and employees for job vacancies filled either by hiring or promotion. This review includes those with qualified individuals with disability and qualified protected veterans.

In order to ensure that there has been proper consideration of the qualifications of applicants and employees, UNCW annotates the application of each known covered applicant or employee with each vacancy or promotion for which he or she was considered. The recruitment folder containing this information would be made available to the Department of Labor in carrying out its review of compliance activities.

In addition, UNCW will, in each case where a protected veteran or disabled person is rejected for employment, promotion, or training, make and retain a record sufficient to describe the reasons for the non-selection and the name of the person who was selected. If an accommodation was considered, the record also will reflect this information.

UNCW will make and retain a record of all accommodations undertaken that make it possible to place a protected veteran or disabled individual in a job. Records will be retained in accordance with the University Records Retention Schedule.
To ensure that none of the positions at UNCW have requirements that tend to screen out qualified disabled individuals or qualified protected veterans unless they are job related and consistent with business necessity, the physical and mental qualifications for each open position are reviewed before it is advertised.

In the same way, UNCW will review physical and mental qualifications of any job whenever the position description for that job is revised.

UNCW does not administer pre-placement physical examinations.

Information obtained about any applicant’s or employees medical condition or history shall be collected and maintained on separate forms and in separate medical files.

These files will be treated as confidential except:

1. Supervisors and managers may be informed regarding necessary restrictions on the work or duties of the applicant or employee and necessary accommodations;

2. First aid and safety personnel may be informed, when appropriate, if the disability might require emergency treatment; and

3. Government officials engaged in enforcing the laws administered by OFCCP or enforcing the Americans with Disabilities Act shall be provided relevant information on request.

4. As required to be disclosed by law.

Information obtained regarding the medical history or condition of any applicant or employee shall not be used for any purpose inconsistent with the law.
SECTION XI

REASONABLE ACCOMMODATIONS FOR PHYSICAL AND MENTAL LIMITATIONS

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

UNCW will make reasonable accommodations for the known physical and mental limitations of an otherwise qualified individual unless it can demonstrate that the accommodation would impose an undue hardship on UNCW by assessing whether the requested accommodation would cause significant difficulty or expense as provided by the Section 503 regulations.

If an employee with a known disability 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 employee’s supervisor will confidentially inform the employee of the performance problem and discuss with the employee the need to be able to perform the work, and invite the employee to discuss what type of assistance may be needed to be able to successfully perform the work. If the employee responds that a reasonable accommodation is needed, the supervisor will consider the request for reasonable accommodation which will enable the employee to perform the job as expected in accordance with those standards like all employees in the same or similar position.
SECTION XII

HARASSMENT

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

UNCW prohibits harassment or discrimination of its employees based on race, color, religion, sex, sexual orientation, gender identity, national origin, age, disability, genetic information, or veteran status. Any employee who believes he or she has been harassed on one or more of these bases is urged to bring this to the attention of the supervisor or the EEO Officer immediately.

Any supervisor who witnesses such harassment or is otherwise informed of a violation of this policy is directed to bring this to the immediate attention of the EEO Officer. Failure of a supervisor (or others) with such knowledge to promptly advise responsible UNCW officials is grounds for disciplinary action up to and including dismissal.

The investigation of any such complaint shall be carried out promptly and shall involve only those persons with a need to know.

Any employee found to have harassed another employee in violation of UNCW’s policy is subject to disciplinary action up to and including dismissal, depending on the severity of the offense.
SECTION XIII

MANDATORY JOB LISTING

41 CFR §60-300.5(a)(2)

Listing of SHRA employment openings with the North Carolina Division of Employment Security shall be made concurrently with the use of any other external recruitment sources or efforts.

UNCW will externally advertise jobs to create broad-based pools of applicants. The Chancellor may directly determine appointments for certain senior positions without advertising. Only in exceptional circumstances will other positions be filled without posting or from an internal posting only within the organization. Such exceptions must be approved by the EEO Officer. These exceptions would include efforts to hire individuals with special skills not expected to be obtainable through an open search.

UNCW will treat referrals from the North Carolina Division of Employment Security in the same way that it treats referrals from other sources. That is, such referrals may or may not be interviewed in the same way that UNCW determines to interview applicants who are referred by other means.
The UNCW Recruitment and Compensation team reviews all hiring actions in our recruitment and hiring system which contains demographic data and access to reports that help:

1. measure the effectiveness of our plan;
2. indicate any need for remedial action;
3. assist in determining the degree to which our objectives have been attained;
4. measure our compliance with specific obligations.

Where problems are identified, UNCW will undertake the necessary action to bring the program into compliance.

UNCW retains all records relating to employment decisions, such as advertisements and postings, applications and résumés, interview notes, requests for accommodation, etc. in accordance with the University’s Records Retention Schedule.
## SECTION XV
### SUPPORTING DATA

#### 41 CFR 60-300.44(h)

### UNCW Self-Audit (VEVRAA)

<table>
<thead>
<tr>
<th>VEVRAA AAP Component</th>
<th>Requirements</th>
<th>Date last inspected for compliance and Results of Inspection (Compliant (C)/Not Compliant (NC))</th>
<th>Follow-on or remedial actions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Invitation to self-identify at the pre-offer stage (41 CFR 60-300.42(a))</td>
<td>As of 2018 UNCW will invite applicants to self-identify as a protected veteran pre-offer using a form that conforms to OFCCP requirements at 41 CFR 60-300.42(a) and (c)).</td>
<td>December 15, 2017; (C)</td>
<td>Link to form is posted on UNCW employment website.</td>
</tr>
<tr>
<td>Invitation to self-identify at the post-offer stage (41 CFR 60-300.42(b))</td>
<td>UNCW invites applicants to self-identify as a protected veteran post-offer using a form that conforms to OFCCP requirements at 41 CFR 60-300.42(b) and (c)).</td>
<td>December 15, 2017; (C)</td>
<td>Form is presented to employees at New Employee Orientation.</td>
</tr>
<tr>
<td>Policy Statement (41 CFR 60-300.44(a))</td>
<td>Policy Statement posted on bulletin boards.</td>
<td>December 15, 2017; (C)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Policy Statement made available, as needed, in a form that is accessible and understandable to disabled veterans.</td>
<td>December 15, 2017; (C)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Policy Statement contains required non-discrimination and non-retaliation statements.</td>
<td>December 15, 2017 (C)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Policy Statement indicates top executive support for AAP.</td>
<td>December 15, 2017; (C)</td>
<td></td>
</tr>
<tr>
<td>Review of Personnel Processes (41 CFR 60-300.44(b))</td>
<td>UNCW conducts periodic review of personnel processes using procedures designed to facilitate this review.</td>
<td>December 15, 2017; (C)</td>
<td></td>
</tr>
<tr>
<td>VEVRAA AAP Component</td>
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</tr>
<tr>
<td>Physical and Mental Qualifications (41 CFR 60-300.44(c))</td>
<td>UNCW provides and adheres to a schedule for reviewing all physical and mental qualification standards in the AAP. Whenever a new position is created or an existing position is restudied due to changes in the role, physical and mental qualification standards are reviewed. UNCW demonstrates that, if a physical/mental qualification standard tends to screen out qualified disabled veterans, the standards are job-related and consistent with business necessity.</td>
<td>December 15, 2017; (C)</td>
<td></td>
</tr>
<tr>
<td>Reasonable Accommodations (41 CFR 60-300.44(d))</td>
<td>UNCW provides reasonable accommodations for the known physical and mental limitations of otherwise qualified disabled veterans absent undue hardship.</td>
<td>December 15, 2017; (C)</td>
<td></td>
</tr>
<tr>
<td>Harassment (41 CFR 60-300.44(e))</td>
<td>UNCW has developed and implemented procedures to ensure employees are not harassed on the basis of protected veteran status and provided those procedures in the AAP.</td>
<td>December 15, 2017; (C)</td>
<td></td>
</tr>
<tr>
<td>External dissemination of policy, outreach, and positive recruitment (41 CFR 60-300.44(f))</td>
<td>UNCW undertakes appropriate outreach and positive recruitment activities that are reasonably designed to effectively recruit qualified protected veterans. UNCW documents all outreach and recruitment activities and retains such documents for a period of three years. UNCW conducts an assessment of each outreach and recruitment activity, and an assessment of the effectiveness of the totality of these activities that meets these requirements:</td>
<td>December 15, 2017; (C)</td>
<td>Began documenting outreach and recruitment activities during 2015 period; (C)</td>
</tr>
</tbody>
</table>

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<table>
<thead>
<tr>
<th>VEVRAA AAP Component</th>
<th>Requirements</th>
<th>Date last inspected for compliance and Results of Inspection (Compliant (C)/Not Compliant (NC))</th>
<th>Follow-on or remedial actions</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>External dissemination of policy, outreach, and positive recruitment (41 CFR 60-300.44(f))</strong></td>
<td>UNCW conducts an overall assessment annually; UNCW documents criteria it uses in its assessment, which includes data collected pursuant to 41 CFR 60-300.44(k) for current year and the two most recent previous years; UNCW evaluates each outreach and recruitment activity using the criteria set out &amp; comes to a reasonable conclusion as to whether each activity is effective in identifying and recruiting protected veterans; UNCW provides an assessment of its overall outreach and recruitment efforts and, if it concludes that these overall efforts are not effective, UNCW identifies and implements alternative efforts; and UNCW documents these assessments and retains such documents for three years.</td>
<td>December 15, 2017; (C)</td>
<td>Beginning with data from 2017; (C)</td>
</tr>
<tr>
<td><strong>Internal Dissemination of Policy (41 CFR 60-300.44(g))</strong></td>
<td>UNCW includes its affirmative action policy in the policy manual or makes it otherwise available to employees.</td>
<td>December 15, 2017; (C)</td>
<td></td>
</tr>
<tr>
<td><strong>Audit and Reporting System (41 CFR 60-300.44(h))</strong></td>
<td>UNCW has designed and implemented an audit and reporting system that: (a) measures the effectiveness of UNCW AAP, (b) indicates any need for remedial action, (c) determines whether UNCW’s affirmative action objectives have been reached, (d) determines whether known protected veterans have had the opportunity to participate in all company sponsored educational, training, recreational and social activities, (e) and measures UNCW’s compliance with the AAP’s specific objectives.</td>
<td>Beginning with data from 2017; (C)</td>
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</tr>
<tr>
<td></td>
<td>UNCW documents the actions it takes to comply with audit and reporting system obligations and retains these documents as employment records.</td>
<td>Beginning with data from 2017; (C)</td>
<td></td>
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<tr>
<td></td>
<td>UNCW undertakes necessary action to bring its AAP into compliance if it finds any deficiencies.</td>
<td>Beginning with data from 2017; (C)</td>
<td></td>
</tr>
<tr>
<td><strong>Responsibility for Implementation (41 CFR 60-300.44(i))</strong></td>
<td>UNCW assigns an official the responsibility for implementation of its AAP activities whose identity appears on all internal and external communications regarding the AAP and is supported by senior management and staff to implement the AAP.</td>
<td>December 15, 2017; (C)</td>
<td></td>
</tr>
<tr>
<td>VEVRAA AAP Component</td>
<td>Requirements</td>
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<tr>
<td>Training (41 CFR 60-300.44(j))</td>
<td>UNCW trains all personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes to ensure the commitments in the AAP are carried out.</td>
<td>December 15, 2017; (C)</td>
<td></td>
</tr>
<tr>
<td>Data Collection Analysis (41 CFR 60-300.44(k))</td>
<td>UNCW documents the following computations or comparisons pertaining to applicants and hires on an annual basis and maintains them for a period of three years: 1. The number of applicants who self-identified as protected veterans at the pre-offer stage of UNCW’s employment process; 2. The total number of job openings; 3. Total number of jobs filled; 4. The total number of applicants for all jobs; 5. The number of protected veteran applicants hired; 6. The total number of applicants hired.</td>
<td>Beginning with data from 2017; (C)</td>
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</tr>
<tr>
<td>Hiring Benchmarks (41 CFR 60-300.45)</td>
<td>UNCW establishes a hiring benchmark annually using the national percentage of veterans in the civilian labor force provided by OFCCP and will use the percentage in its next assessment of the effectiveness of UNCW’s outreach and recruitment efforts towards protected veterans.</td>
<td>Beginning with data from 2015; (C)</td>
<td></td>
</tr>
</tbody>
</table>
Personnel Activity (establishment-wide)
VEVRAA

<table>
<thead>
<tr>
<th>Hires</th>
<th>Applicants</th>
<th>Promotions - Into Job Group</th>
<th>Terminations</th>
<th>Layoffs</th>
<th>Recalls</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total</td>
<td>Vets</td>
<td>Total</td>
<td>Vets</td>
<td>Total</td>
<td>Vets</td>
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<tr>
<td>319</td>
<td>7</td>
<td>26,290</td>
<td>720</td>
<td>51</td>
<td>0</td>
</tr>
</tbody>
</table>

Applicant Flow Log
VEVRAA

[Withheld from distribution or public inspection to ensure confidentiality]

<table>
<thead>
<tr>
<th>Name</th>
<th>Race/Ethnicity</th>
<th>Sex</th>
<th>VET (Y/N)</th>
<th>Date of Application</th>
<th>Job Title</th>
<th>Interview (Y/N)</th>
<th>Action Taken (H/NH)</th>
<th>Date Action Taken</th>
</tr>
</thead>
<tbody>
<tr>
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<tr>
<td>SECTION 503 AAP Component</td>
<td>Requirements</td>
<td>Date last inspected for compliance and Results of Inspection (Compliant (C) / Not Compliant (NC))</td>
<td>Follow-on or remedial actions</td>
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</tr>
<tr>
<td>Invitation to self-identify at the pre-offer stage of employment process (41 CFR 60-741.42(a)(1) &amp; (2))</td>
<td>UNCW invites applicants to self-identify as an individual with a disability pre-offer using the invitation form provided by OFCCP.</td>
<td>December 15, 2017; (NC)</td>
<td>Update website to include link to form.</td>
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<tr>
<td>Invitation to self-identify at the post-offer stage of employment process (41 CFR 60-741.42(b)(1) &amp; (2))</td>
<td>UNCW invites applicants to self-identify as an individual with a disability post-offer using the invitation form provided by OFCCP.</td>
<td>December 15, 2017; (NC)</td>
<td>Update website to include link to form.</td>
<td></td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>Employee invitation to self-identify (41 CFR 60-741.42(c))</td>
<td>All UNCW employees received an email on July 8, 2014 to voluntarily self-identify as an individual with a disability. The email contained a link to the electronic self-id form and instructions that they could self-identify at any time. UNCW will extend this invitation to self-identify to employees every five years thereafter.</td>
<td>December 15, 2017; (C)</td>
<td>Issue next invitation to self-identify during the first week of July, 2019.</td>
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</tr>
<tr>
<td>Policy Statement (41 CFR 60-741.44(a))</td>
<td>Policy Statement posted on bulletin boards.</td>
<td>December 15, 2017; (C)</td>
<td></td>
<td></td>
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<tr>
<td>Policy Statement made available, as needed, in a form that is accessible and understandable to individuals with disabilities.</td>
<td>December 15, 2017; (C)</td>
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<td>Policy Statement contains required non-discrimination and non-retaliation statements.</td>
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<tr>
<td>Review of Personnel Processes (41 CFR 60-741.44(b))</td>
<td>UNCW conducts periodic review of personnel processes using procedures designed to facilitate this review.</td>
<td>December 15, 2017; (C)</td>
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<tr>
<td>UNCW provides necessary reasonable accommodations to ensure applicants and employees with disabilities receive equal opportunity in the operation of personnel processes.</td>
<td>December 15, 2017; (C)</td>
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<tr>
<td>SECTION 503 AAP Component</td>
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<td>Date last inspected for compliance and Results of Inspection (Compliant (C) / Not Compliant (NC))</td>
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<td>Physical and Mental Qualifications (41 CFR 60-741.44(c))</td>
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<td>December 15, 2017; (C)</td>
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<td></td>
</tr>
<tr>
<td>Reasonable Accommodations for Physical and Mental Limitations (41 CFR 60-741.44(d))</td>
<td>UNCW provides reasonable accommodations for known physical and mental limitations of otherwise qualified individuals with disabilities, absent undue hardship.</td>
<td>December 15, 2017; (C)</td>
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</tr>
<tr>
<td>Harassment (41 CFR 60-741.44(e))</td>
<td>UNCW has developed and implemented procedures to ensure employees are not harassed on the basis of disability and provided those procedures in the AAP.</td>
<td>December 15, 2017; (C)</td>
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</tr>
<tr>
<td>External dissemination of policy, outreach, and positive recruitment (41 CFR 60-741.44(f))</td>
<td>UNCW undertakes appropriate outreach and positive recruitment activities reasonably designed to effectively recruit qualified individuals with disabilities. UNCW documents all outreach and recruitment activities and retains such documents for a period as provided by its Records Retention Policy.</td>
<td>December 15, 2017; (C)</td>
<td>Began documenting outreach and recruitment activities during 2015</td>
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</tr>
<tr>
<td>SECTION 503 AAP Component</td>
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</tr>
<tr>
<td>External dissemination of policy, outreach, and positive recruitment (41 CFR 60-741.44(f))</td>
<td>UNCW conducts an assessment of each outreach and recruitment activity, and an assessment of the effectiveness of the totality of these activities that meets these requirements. UNCW conducts an overall assessment annually. UNCW documents criteria it uses in its assessment, including data collected pursuant to 41 CFR 60-741.44(k) for current year &amp; the two previous years; UNCW evaluates each outreach and recruitment activity using the criteria set out and comes to a reasonable conclusion as to whether each activity is effective in identifying and recruiting qualified individuals with disabilities; UNCW provides an assessment of its overall outreach and recruitment efforts and, if it concludes that these overall efforts are not effective, identifies and implements alternative efforts; and UNCW documents these assessments and retains such documents for 3 years.</td>
<td>Began documenting outreach and recruitment activities during 2015 December 15, 2017; (C) Beginning with data from 2017; (C) December 15, 2017 (C) December 15, 2017; (C) Beginning with data from 2017; (C)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Internal Dissemination of Policy (41 CFR 60-741.44(g))</td>
<td>UNCW includes its affirmative action policy in the policy manual or makes it otherwise available to employees.</td>
<td></td>
<td>December 15, 2017; (C)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Audit and Reporting System (41 CFR 60-741.44(h))</td>
<td>UNCW has designed and implemented an audit and reporting system that: (a) measures the effectiveness of UNCW’s AAP, (b) indicates any need for remedial action, (c) determines whether affirmative action objectives have been reached, (d) determines whether known individuals with disabilities have had the opportunity to participate in all company sponsored educational, training, recreational and social activities, (e) and measures compliance with the AAP’s specific objectives.</td>
<td></td>
<td>December 15, 2017; (C)</td>
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<tr>
<td>SECTION 503 AAP Component</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>Audit and Reporting System (41 CFR 60-741.44(h)) (continued)</td>
<td>UNCW documents the actions it takes to comply with audit and reporting system obligations. It retains these documents as employment records (see § 60-741.80).</td>
<td>Beginning with data from 2017; (C)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>UNCW undertakes necessary action to bring AAP into compliance if it finds any deficiencies.</td>
<td>December 15, 2017; (C)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Responsibility for Implementation (41 CFR 60-741.44(i))</td>
<td>UNCW assigns an official the responsibility for implementation of its AAP activities whose identity appears on all internal and external communications regarding the AAP and is supported by senior management and staff to implement the AAP.</td>
<td>December 15, 2017; (C)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Training (41 CFR 60-741.44(j))</td>
<td>UNCW trains all personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes to ensure the commitments in the AAP are carried out.</td>
<td>December 15, 2017; (C)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Data Collection Analysis (41 CFR 60-741.44(k))</td>
<td>UNCW documents the following computations or comparisons pertaining to applicants and hires on an annual basis and maintains them for a period of three years: 1. The number of applicants who self-identified as individuals with disabilities at the pre-offer stage of the employment process (§ 60-741.42(a)); 2. The total number of job openings; 3. Total number of jobs filled; 4. The total number of applicants for all jobs; 5. The number of applicants with disabilities hired; 6. The total number of applicants hired.</td>
<td>Beginning with data from 2017; (C)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Utilization goals (41 CFR 60-741.45)</td>
<td>UNCW establishes the utilization goal provided by OFCCP for the employment of individuals with disabilities for each job group in UNCW’s workforce and uses this percentage in its assessment of the effectiveness of outreach and recruitment efforts towards individuals with disabilities</td>
<td>Beginning with data from 2017; (C)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
SECTION XVI

APPLICANT AND HIRING DATA

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

[Withheld from distribution or public inspection to ensure confidentiality]

Protected Veterans

UNCW has always engaged in positive outreach and recruitment for protected veterans as required by OFCCP regulations. To comply with requirements of 41 CFR 60-300.44(k) it has modified its applicant flow logs. It has adopted OFCCP’s current 6.9% hiring benchmark goal for protected veterans. UNCW collects employee data pertaining to protected veterans in order to assess the effectiveness of UNCW’s outreach and recruitment efforts. UNCW invites applicants to voluntarily inform us whether they believe they are protected veterans in compliance with the VEVRAA requirements.

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

1. The number of applicants who self-identify 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
5. The total number of applicants hired

<table>
<thead>
<tr>
<th>Applicant/Hiring Data</th>
<th>2016</th>
<th>2017</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of applicants who self-identify as protected veterans before an offer of employment is made</td>
<td>930</td>
<td>940</td>
</tr>
<tr>
<td>Total number of job openings</td>
<td>313</td>
<td>397</td>
</tr>
<tr>
<td>Total number of jobs filled</td>
<td>318</td>
<td>329</td>
</tr>
<tr>
<td>Total number of applicants for all jobs</td>
<td>22,253</td>
<td>26,290</td>
</tr>
<tr>
<td>Number of protected veteran applicants hired</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total number of applicants hired</td>
<td>225</td>
<td>250</td>
</tr>
</tbody>
</table>
**Individuals with Disabilities**

UNCW maintains data regarding the recruitment and hiring of individuals who self-identify as individuals with disabilities. UNCW uses this data to evaluate the representation of individuals with disabilities in its workforce. UNCW assesses its efforts to attain OFCCP’s 7% utilization goal for the recruitment of individuals with disabilities on an annual basis. UNCW invites applicants to voluntarily inform it whether they believe they are individuals with disabilities in compliance with the Section 503 requirements.

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

1. The number of applicants who self-identify 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
5. The total number of applicants hired

<table>
<thead>
<tr>
<th>Applicant/Hiring Data</th>
<th>2016</th>
<th>2017</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of applicants who self-identify with disabilities before an offer of employment is made</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total number of job openings</td>
<td>313</td>
<td>397</td>
</tr>
<tr>
<td>Total number of jobs filled</td>
<td>318</td>
<td>329</td>
</tr>
<tr>
<td>Total number of applicants for all jobs</td>
<td>22,253</td>
<td>26,290</td>
</tr>
<tr>
<td>Number of applicants with disabilities hired</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total number of applicants hired</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Data Collection and Analysis for Protected Veterans

UNCW will evaluate the results of each outreach and recruitment activity for protected veterans using the following criteria, which includes data collected under 41 CFR 60-300.44(k), to see if it is producing measurable results:

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 UNCW’s outreach to individuals with protected status in the community?
4. Did the activity increase our ability to include individuals with protected veteran status in its workforce?

UNCW began accessing its outreach and recruitment efforts in 2016, using the above stated evaluation criteria.

<table>
<thead>
<tr>
<th>Activity</th>
<th>Did activity attract qualified applicants with protected veteran status?</th>
<th>Did activity result in hiring of qualified individuals with protected status?</th>
<th>Did activity expand UNCW’s outreach to individuals with protected status in the community?</th>
<th>Did activity increase UNCW’s ability to include individuals with protected status in its workforce?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hire our Heroes (5/16/16)</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>UNCW Hire Heroes Career Event (8/23/16)</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Send all postings to Local Job Network’s list of veteran organizations (ongoing)</td>
<td>Yes</td>
<td>Unknown</td>
<td>Yes</td>
<td>Yes</td>
</tr>
</tbody>
</table>

In 2015 we began using Local Job Networks to expand our reach to protected veterans seeking employment. This activity is ongoing.
Some examples of the outreach areas for veterans where UNCW’s job postings are regularly sent include:

<table>
<thead>
<tr>
<th>Veterans Organizations</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>Army Career and Alumni Program (ACAP) - Fort Bragg - 82nd Airborne</td>
<td>Fort Bragg, NC</td>
</tr>
<tr>
<td>Brunswick County Veteran Services</td>
<td>Bolivia, NC</td>
</tr>
<tr>
<td>Coastal Carolina Community College</td>
<td>Jacksonville, NC</td>
</tr>
<tr>
<td>Columbus County Veteran Services</td>
<td>Whiteville, NC</td>
</tr>
<tr>
<td>Cumberland County Veteran Services</td>
<td>Fayetteville, NC</td>
</tr>
<tr>
<td>Cumberland County JobLink Career Center</td>
<td>Fayetteville, NC</td>
</tr>
<tr>
<td>Displaced Homemaker Program – Brunswick</td>
<td>Bolivia, NC</td>
</tr>
<tr>
<td>Displaced Homemaker Program – Columbus</td>
<td>Whiteville, NC</td>
</tr>
<tr>
<td>Displaced Homemaker Program – New Hanover</td>
<td>Wilmington, NC</td>
</tr>
<tr>
<td>Domestic Violence Shelter and Services, Inc.</td>
<td>Wilmington, NC</td>
</tr>
<tr>
<td>Fayetteville State University</td>
<td>Fayetteville, NC</td>
</tr>
<tr>
<td>Greater Jacksonville-Onslow Chamber of Commerce</td>
<td>Jacksonville, NC</td>
</tr>
<tr>
<td>Greater Wilmington Chamber of Commerce</td>
<td>Wilmington, NC</td>
</tr>
<tr>
<td>High Point JobLink Career Center</td>
<td>High Point, NC</td>
</tr>
<tr>
<td>Lenoir County Veteran Services</td>
<td>Kinston, NC</td>
</tr>
<tr>
<td>NC Employment Security Commission – Shallotte</td>
<td>Shallotte, NC</td>
</tr>
<tr>
<td>New Hanover County Veteran Services</td>
<td>Wilmington, NC</td>
</tr>
<tr>
<td>New Hanover County Workforce Center – Veteran Services</td>
<td>Wilmington, NC</td>
</tr>
<tr>
<td>Pender County Veteran Services</td>
<td>Burgaw, NC</td>
</tr>
<tr>
<td>South Brunswick Islands Chamber of Commerce</td>
<td>Shallotte, NC</td>
</tr>
<tr>
<td>The Museum of the Native American Resource Center</td>
<td>Pembroke, NC</td>
</tr>
<tr>
<td>Vocational Rehabilitation – Fayetteville</td>
<td>Fayetteville, NC</td>
</tr>
<tr>
<td>Vocational Rehabilitation – Jacksonville</td>
<td>Jacksonville, NC</td>
</tr>
<tr>
<td>Whole Vet</td>
<td>Morrisville, NC</td>
</tr>
<tr>
<td>US Military Pipeline (job posting online website)</td>
<td>National</td>
</tr>
</tbody>
</table>

UNCW participated in a conference hosted by regional veteran advocacy groups to build outreach efforts and identify improved processes for connecting with recently separated veterans and disabled veterans. It worked collaboratively with NC4ME and institutions within the University of North Carolina to create a combined targeted job fair for protected veterans in May 2016. UNCW will continue to expand its outreach and positive recruitment efforts in 2018.

**Data Collection and Analysis for Individuals with Disabilities**

The University of North Carolina General Administration 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 UNCW’s outreach to individuals with disabilities in the community?

4. Did the activity increase UNCW’s ability to include individuals with disabilities in its workforce?

UNCW assessed its outreach and recruitment efforts using the above stated evaluation criteria and documented its assessment below:

<table>
<thead>
<tr>
<th>Activity</th>
<th>Did activity attract qualified applicants with disabilities?</th>
<th>Did activity result in hiring of qualified Individuals with disabilities?</th>
<th>Did activity expand UNCW’s outreach to individuals with disabilities in the community?</th>
<th>Did activity increase UNCW’s ability to include individuals with disabilities in its workforce?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Send all postings to Local JobNetwork’s list of disability-focused organizations (ongoing)</td>
<td>Yes</td>
<td>Not able to track in PeopleAdmin unless an applicant provides additional information</td>
<td>Yes</td>
<td>Yes</td>
</tr>
</tbody>
</table>

In 2015, we began using Local JobNetworks to expand our reach to individuals with disabilities seeking employment. This activity is ongoing.

Some examples of the outreach areas for individuals with disabilities where UNCW’s job postings are regularly sent include:

<table>
<thead>
<tr>
<th>People with Disabilities</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alliance of Disability Advocates – ADA</td>
<td>Raleigh, NC</td>
</tr>
<tr>
<td>Disability Rights North Carolina</td>
<td>Raleigh, NC</td>
</tr>
<tr>
<td>Disabled American Veterans – Vance County Chapter #97</td>
<td>Fayetteville, NC</td>
</tr>
<tr>
<td>Vocational Rehabilitation Offices</td>
<td>North Carolina locations: Elizabethtown, Fayetteville, Jacksonville, Kinston.</td>
</tr>
</tbody>
</table>
section xviii

utilization analysis

41 CFR §60-741.45(d)
41 CFR §60-741.45(d)(2)

human resources has conducted a job group analysis to ensure UNCW job titles were assigned to the appropriate job group codes. (Exhibit 13). The resulting job group assignments were used in UNCW’s utilization analysis. The utilization analysis is found in Exhibits 12, 13, 14, and 15. In cases where employment was below availability, further analysis was conducted to determine if there was underutilization. Job groups have been identified which have placement goals for women and minorities, veterans, and individuals with disabilities. The statistical method used to determine underutilization by comparing employment with availability was 2 standard deviations.

All placement goals are set to be equal to availability and good faith efforts will be made to attain these goals. We want to emphasize that these goals are not quotas, which are prohibited by statute (41 C.F.R. § 60-2.16(e)).
SECTION XIX
HIRING BENCHMARKS

41 CFR 60-300.45

Establishment of Hiring Benchmarks

UNCW has adopted the national percentage of veterans in the civilian labor force provided by OFCCP, currently 6.9%, as its hiring benchmark for the 2017 AAP year. UNCW has analyzed its success in hiring protected veterans during the course of this AAP year based on this benchmark and will use its analysis as one of the criteria in its assessment of the effectiveness of its outreach and recruitment efforts.
As required by applicable regulations, UNCW:

1. Will include the equal opportunity clause in each of our covered contracts and purchase orders, either in totality or by incorporation by reference. 41 CFR §60-741.5, 41 CFR §60-300.5

2. Will post in conspicuous places, available to applicants and employees, notices in the form prescribed by the Department of Labor which state UNCW’s obligation under the law to refrain from discrimination and to engage in affirmative action with respect to qualified individuals with disabilities and qualified protected veterans. 41 CFR §60-741.5, 41 CFR §60-300.5.

3. Will not, when employing or promoting qualified protected veterans reduce the amount of compensation offered because of any disability income, pension or other benefit the applicant or employee receives from another source. 41 CFR §60-741.21(i), 41 CFR §60-300.21 (i)

4. Will not deny a qualified individual with a disability equal access to insurance or subject such individual to different terms or conditions of insurance based on disability alone, if the disability does not pose increased risks. 41 CFR §60-741.25, 41 CFR §60-300.25

5. Will make this Affirmative Action Plan available on our website.
SECTION XXI

EXHIBITS

1. Policy on Equality of Opportunity in the University, Office of State Human Resources
   Equity Opportunity Policy, and the UNCW Equal Employment Opportunity Policy
2. Chancellor’s Reaffirmation of Commitment to Equal Education and Employment
   Opportunity
3. State of North Carolina General Contract Terms and Conditions
4. Reduction in Force Guidelines for SHRA Employees
5. Career Banding Salary Administration Plan
6. Merit Based SHRA Recruitment and Selection Plan
7. Workforce Analysis Summary
8. Job Group Analysis Summary
9. Factor Availabilities
10. Availability Analysis
11. Incumbency v. Estimated Availability Summary
12. Annual Placement Goals
13. Job Groups, EEO Codes, and Census Occupations Assigned to Job Titles
14. Veteran Incumbency v. Benchmark Summary
15. Disability Incumbency v. Goal Summary
16. Notice of Right of Inspection