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accessible and understandable to applicants and employees and

- Keeping management informed of the latest developments in affirmative action.

The responsibilities of managers and supervisors under this AAP include:

- Taking action to prevent the discrimination and harassment of employees
- Ensuring their departments fully comply with the spirit and letter of the affirmative action program and policies
- Reviewing the qualifications of all applicants and employees to make sure qualified individuals are treated in a nondiscriminatory manner with regard to hire, promotion, transfer, and termination
- Reviewing the job performance of each employee to assess whether personnel actions are justified based on the employee's performance of his or her job duties and responsibilities and
- Working with the Affirmative Action Officer or Human Resources Manager and qualified veteran employees or applicants with known disabilities to determine appropriate reasonable accommodations if they are necessary for performance of the job and/or recruitment process.





## **Review of Personnel Policies**

### **41 C.F.R. 60-300.44(b)**

Emory University periodically reviews its personnel procedures to determine whether they ensure the careful, thorough, and systematic consideration of the job qualifications of employees or job applicants who are protected veterans for jobs filled either through vacancy or promotion and for educational or training opportunities. The University ensures that its personnel processes facilitate the implementation of the Affirmative Action Program.

Vacancies are advertised, and applications are accepted from any interested person. Emory University's employment application, the Careers section of its website, and all advertisements include a link to the non-discrimination statement to further assure applicants of the University's policy of equal employment opportunity. An EEO statement will be included in other recruitment literature should the University use such documents in the future. All non-executive positions lasting three days or more not expected to fill from within will be referred to the appropriate state employment service delivery system. In addition, to ensure protected veterans are aware of our openings, the University will send vacancy announcements to the sources listed in the Outreach, Positive Recruitment, and External Dissemination of Policy section of this Affirmative Action Program.

The University ensures its personnel processes do not limit, segregate, or classify an employee or job applicant in a way that adversely affects employment opportunities or status on the basis of status as a protected veteran. The University makes sure when a protected veteran is considered for an employment opportunity, the University relies only on that portion of the individual's military record, including his or her discharge papers, relevant to the requirements of the opportunity at issue. The University periodically reviews any physical and mental job qualifications to ensure they do not tend to screen out disabled veterans for reasons that are not job related or consistent with business necessity, or do not relate to ensuring the safe performance of the essential functions of the job. The University makes any necessary modifications to ensure applicants and employees receive equal opportunity in the operation of all personnel processes, and protected veterans are not stereotyped in a manner that limits their access to jobs for which they are qualified.

The University ensures applicants and employees who are protected veterans and who meet job qualifications have equal access to its personnel process, including those implemented through information and communication technologies, and provides necessary reasonable accommodation to make sure applicants and employees who are disabled veterans receive equal opportunity in the operation of all personnel processes.

## **Review of Physical and Mental Job Requirements**

### **41 C.F.R. 60-300.44(c)**

Emory University reviews physical and mental job qualification requirements as job qualification requirements are established or revised to ensure qualification requirements do not screen out qualified individuals with disabilities or qualified disabled veterans for reasons that are not job related or consistent with business necessity and the safe performance of the essential functions of the job. This review occurs at regular intervals throughout each calendar year, such as when a job may be advertised or filled through hiring or promotion, when the duties of a position are significantly revised, and when considering requests for reasonable accommodation related to the performance of the functions of the position.

Emory University also regularly reviews its personnel processes to ensure any medical exams or inquiries are conducted in accordance with the Section 503 regulations. Information regarding the medical condition or history of an individual obtained as a result of any such inquiry or exam is collected and maintained on separate forms and in separate medical files and treated as a confidential medical record.

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

To date, no qualification requirements have been identified that are likely to have a screening effect. All job qualification requirements have been found to be job related, consistent with business necessity, or required for the safe performance of the job.





**Compensation**  
**41 C.F.R. 60-300.21(i)**

In offering employment or promotions, Emory University does not reduce the amount of compensation offered to protected veterans because of any disability income, pension, or other benefit the employee receives from another source. Similarly, the University does not reduce the amount of compensation offered to an employee or applicant because of the actual or anticipated cost of a reasonable accommodation needed, requested, or anticipated.







**Training**  
**41 C.F.R. 60-300.44(j)**

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



## **Outreach, Positive Recruitment and External Dissemination of Policy**

### **41 C.F.R. 60-300.44(f)**

Emory University has reviewed its employment practices to determine whether its personnel programs are designed to effectively recruit and advance in employment protected veterans. While the University believes there are no deficiencies in its current employment practices with respect to applicants and employees who are protected veterans, it engages in outreach, positive recruitment, and external dissemination programs to augment its existing affirmative efforts. For example, the University sends written notification of its affirmative action policy to all subcontractors, including subcontracting vendors and suppliers, and requests appropriate action on their part. In addition, the University engages in or has made plans to implement the following activities:

- Emory University makes the Equal Employment Opportunity Clause part of all covered contracts and purchase orders.
- The University posts all job vacancies (other than some executive and senior management positions or positions lasting three days or less) for which it considers outside applicants with the state workforce agency job bank or local employment delivery system where the opening occurs. These postings occur before or concurrently with the use of other recruitment efforts to fill the job and are provided in the manner and format specified by the relevant agency that will allow the agency to provide priority referral of protected veterans.
- Emory University has notified the employment service delivery system in each state where it has establishments that it is a federal contractor and it desires priority referrals of protected veterans for job openings in that state. The University also provided the employment service delivery system with the name and location of all hiring locations within the state and the contact information for an employee who can answer questions about such job listings. The notice also included the names and contact information for job search organizations the University uses to assist in hiring, if any. If any of the information in this disclosure changes, the University sends an update with the next relevant job listing.
- Executives, management officials, supervisors, and other employees of the University are encouraged to assist in the effort to disseminate Emory University's policy of affirmative action to appropriate individuals outside of the University.
- The University will inform recruiting sources of Emory University's policy of affirmative action for protected veterans. Recruiting sources will be requested to actively recruit and refer qualified protected veterans for all positions.
- Emory University will identify local organizations and/or community agencies known to specialize placing and/or developing training programs for protected veterans and send them notices of vacant positions. Examples of these outreach efforts include contacting the following:
  - Veterans' Employment Representative in the employment service center near the facilities covered in this AAP
  - Department of Veterans Affairs Regional office near the facilities covered in this AAP
  - Veterans' coordinators on campuses where the University normally recruits





**Veterans Data Collection Analysis**

**For Period: 11/1/2015 to 10/31/2016**

	<b>Total</b>
<b>Number of Job Openings</b>	1399
<b>Number of Jobs Filled</b>	1323
<b>Number of Protected Veteran Applicants</b>	1782
<b>Number of Applicants</b>	73514
<b>Number of Protected Veteran Hires</b>	14
<b>Number of Hired Applicants</b>	1323

Confidential - Not subject to inspection by employees or applicants under 41 CFR Section 60-300.41.



## **Monitoring and Reporting Systems**

### **41 C.F.R. 60-300.44(h)**

It is the responsibility of the University's Affirmative Action Officer to monitor employment and personnel practices to ensure compliance with applicable regulations and adherence to the University's Statement of Policy, to report specific problems to the appropriate management personnel, and to measure the effectiveness of Emory University's AAP.

The University's audit and reporting system is designed and implemented to:

- Measure the effectiveness of the AAP
- Identify any need for remedial action
- Determine the degree to which the University's objectives are being attained
- Determine whether individuals who are known protected veterans have had the full opportunity to participate in all University sponsored educational, training, recreational and social activities
- Measure the University's compliance with the AAP's specific obligations, and
- Document the actions taken to monitor the University's compliance with the AAP's specific obligations.

In order to measure the effectiveness of the AAP, the University may take the following actions:

- Audit its voluntary self-identification process to monitor the number of protected veterans who choose to self-identify and evaluates whether changes could be made to University's self-identification process to encourage greater voluntary self-identification by protected veterans
- Establish a hiring benchmark to measure its progress towards achieving equal employment opportunity for protected veterans
- Review available data computations and analyses regarding applicants and hires
- Review the effectiveness of its recruitment and outreach activities
- Regularly assess its personnel processes to ensure that protected veterans have equal opportunity in employment
- Use a schedule to regularly assess any mental and physical qualifications to ensure that they are job-related and consistent with business necessity
- Audit its communications with vendors and subcontractors to ensure that such communications reflect the University's commitment to equal employment opportunity and affirmative action for protected veterans
- Audit its communications with applicants and employees to ensure that such communications reflect the University's commitment to equal employment opportunity and affirmative action for protected veterans
- Audit its job listings to ensure that the postings reflect the University's commitment to equal employment opportunity and affirmative action for protected veterans, and



- Audit its personnel policies to ensure that such policies reflect the University's commitment to equal employment opportunity and affirmative action for protected veterans.

Where the affirmative action program is found to be deficient, the University shall endeavor to undertake necessary action to bring the program into compliance.

## **List of Exhibits**

Exhibit A - Voluntary Veteran Self-Identification Form: Pre and Post Offer Solicitation

Exhibit B - Annual Notification to Vendors



I am not a protected veteran

I decline to disclose my veteran status

If you are disabled veteran, please let us know if there any reasonable accommodations we could make that would enable you to be considered for a job opening or perform the essential functions of the position you hold. We consider requests for accommodation on a case-by-case basis.

## Exhibit B - Annual Notification to Vendors

To Whom It May Concern:

This letter is to inform you Emory University is committed to the principles of equal employment opportunity. Moreover, as a government contractor subject to by Executive Order 11246, as amended, the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended, and Section 503 of the Rehabilitation Act of 1973, as amended, Emory University takes its affirmative action obligations very seriously. Emory University states as its Policy of Affirmative Action the following:

- It will be the policy of Emory University not to discriminate on the basis of sex, gender identity, sexual orientation, race, color, religious creed, national origin, physical or mental disability, protected veteran status, or any other characteristic protected by applicable law. This policy applies to all recruitment, hiring, training, and promotion decisions for all job titles.
- All employment decisions shall be consistent with the principle of equal employment opportunity, and only job related qualifications will be required.
- All personnel actions, such as compensation, benefits, transfers, tuition assistance, social and recreational programs, etc. will be administered without discrimination on the basis of sex, gender identity, sexual orientation, race, color, religious creed, national origin, physical or mental disability, protected veteran status, or any other characteristic protected by applicable law.

As a vendor or subcontractor, you are notified you may be subject to the regulations implementing Executive Order 11246, as amended, the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended, and Section 503 of the Rehabilitation Act of 1973, as amended, including: 41 CFR Section 60-300.5(a); 41 CFR Section 60-741.5(a); 41 CFR Section 60-1.4(a) and (c); 41 CFR Section 60-1.7(a); 41 CFR Part 60-2, 48 CFR Section 52.222-54(e); and 29 CFR Part 471, Appendix A to Subpart A with respect to affirmative action program and posting requirements.

As applicable, you shall abide by these requirements which require that covered entities not discriminate and take affirmative action on the basis of sex, gender identity, sexual orientation, race, color, religious creed, national origin, physical or mental disability, and protected veteran status.

To assure compliance with the University's AAP, Maurice Middleton, Affirmative Action Officer, has been designated to administer and monitor the Program and make reports to Senior Management.