



EMORY
UNIVERSITY

Equity and Inclusion
Office of Diversity, Equity,
and Inclusion

Introduction to the Affirmative Action Plan

Brief overview for educational purposes only.



Training Objectives

1. What is an Affirmative Action Plan (AAP)?
2. What is the purpose of an AAP?
3. What are the contents of an AAP?
4. Quantitative Analysis Overview

What is an Affirmative Action Plan (AAP)?

- The AAP is a required document mandated by Executive Order 11246 to ensure non discrimination in employment.
- Executive Order 11246 is enforced by the Office of Federal Contract Compliance Programs (OFCCP).
- Each contractor has to develop and maintain a written affirmative action program, if it has;
 - 50 or more employees and:
 - Has a contract of \$50,00 or more
 - Each contractor has to maintain and make available to OFCCP documentation of our compliance if requested.

Source: E-CFR Part 60-2

Purpose of an Affirmative Action Plan

- Serves as a powerful management tool designed to ensure equal employment opportunity (EEO).
- Ensures EEO by institutionalizing our commitment to equality in every aspect of the employment process.
- Includes policies, practices, and procedures that we implement to ensure that all qualified applicants and employees are receiving an equal opportunity for recruitment, selection, advancement, and every other term and privilege associated with employment.

The premise underlying affirmative action is that, absent discrimination, over time a contractor's workforce, generally will reflect the gender, racial and ethnic profile of the labor pools from which the contractor recruits and selects.

Source: E-CFR Part 60-2

Contents of the Affirmative Action Plan

QUALITATIVE

- Purpose, Policies and Procedures
- Designation of responsibility for implementation
- Identification of problem areas
- Action-oriented programs
- Periodic internal audits

QUANTITATIVE ANALYSES

- Workforce analysis
- Job group analysis
- Placement of incumbents in job groups
- Determining availability
- Comparing incumbency to availability
- Hiring goals

Source: E-CFR Part 60-2

Workforce Analysis

- A workforce analysis is a listing of each job title as it appears on payroll records ranked from the lowest paid to the highest paid within each department.
- For each job title, the total number of incumbents, the total number of male and female incumbents, and the total number of male and female incumbents in each of the following groups must be given: **Blacks, Hispanics, Asians/Pacific Islanders, American Indians/Alaskan Natives, and Two or More Races.**
- The wage rate or salary range for each job title must be given. All job titles, including all managerial job titles, must be listed.

Source: E-CFR Part 60-2

Job Group Analysis

- A job group analysis is a method of combining job titles within the contractor's establishment. This is the first step in the contractor's comparison of the representation of minorities and women in its workforce with the estimated availability of minorities and women qualified to be employed.
- In the job group analysis, jobs at the establishment with similar content, wage rates, and opportunities, must be combined to form job groups.
 - Similarity of content refers to the duties and responsibilities of the job titles which make up the job group.
 - Similarity of opportunities refers to training, transfers, promotions, pay, mobility, and other career enhancement opportunities offered by the jobs within the job group.

Source: E-CFR Part 60-2

University AAP/EEO Job Categories



University Leadership

- Executive and Senior Level Officials and Managers
- First-Level Officials and Managers
- Mid-Level Officials and Managers



Faculty

- Tenured
- Tenure Track
- Non Tenure Track



Staff

- Professionals
- Technicians
- Support Jobs
- Craft Workers
- Laborers
- Service Workers

Source: EEOC: EEO 1 Categories

Hiring Goals

Hiring goals serve as objectives or targets reasonably attainable by means of applying every good faith effort to make all aspects of the entire affirmative action program work.

Hiring goals also are used to measure progress toward achieving equal employment opportunity.

- A goal does not constitute neither a finding nor an admission of discrimination.
- A goal must be at least equal to the availability figure derived for women, minorities, veterans and individuals with disabilities.

Source: E-CFR Part 60-2

Determining Availability

- Availability is an estimate of the number of qualified minorities or women available for employment.
- The purpose of the availability determination is to establish a **benchmark** against the contractor's workforce which can be compared to determine whether barriers to equal employment opportunity may exist. We must determine:
 - The availability of minorities and women for each job group
 - The percentage of minorities and women with requisite skills in the reasonable recruitment area
 - The percentage of minorities and women internally that are promotable, transferable, and trainable and;
 - We must use the most current and discrete statistical information available to derive availability figures i.e. Census data, IPEDS, etc.

Source: E-CFR Part 60-2

Comparing Incumbency to Availability

- The contractor must compare the percentage of minorities and women in each job group with the availability for those job groups.
- When the percentage of minorities or women employed in a particular job group is less than would reasonably be expected given their availability percentage, the contractor must establish a hiring goal.
- Emory uses the 80 percent availability rule for its AAP. That rule applies when the actual employment of minorities or women is less than 80 percent of their availability.

Source: E-CFR Part 60-2

Internal Audit and Reporting System

The contractor must develop and implement an auditing system that periodically measures the effectiveness of its total affirmative action program. The actions listed below are key to a successful affirmative action program:

- Monitor records of all personnel activity, including referrals, placements, transfers, promotions, terminations, and compensation, at all levels to ensure the nondiscriminatory policy is carried out;
- Require internal reporting on a scheduled basis as to the degree to which equal employment opportunity and organizational objectives are attained;
 - **Review report results with all levels of management; and**
 - **Advise top management of program effectiveness and submit recommendations to improve unsatisfactory performance.**

Source: E-CFR Part 60-2

Questions?

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