

# **EXECUTIVE ORDER 11246 AFFIRMATIVE ACTION PLAN (AAP)**

**For**



**401 Golden Shore  
Long Beach, CA 90802  
(562) 951-4000**

**November 1, 2022 - October 31, 2023**

## **PART I: AAP FOR MINORITIES AND WOMEN**

## **PART II: AAP FOR PROTECTED VETERANS AND INDIVIDUALS WITH DISABILITIES**

**AAP Contact:** Arlene Coronel  
Director, HR, Talent Acquisition & Workforce Planning  
The California State University  
Office of the Chancellor  
401 Golden Shore, 1st Floor  
Long Beach, CA 90802  
(562) 951-4070

**EEO Contact:** Karen Bell  
Director, HR Services, Learning and Engagement  
The California State University  
Office of the Chancellor  
401 Golden Shore, 1<sup>st</sup> Floor  
Long Beach, CA 90802  
(562) 951-4070

## **CONFIDENTIAL TRADE SECRET MATERIALS**

This AAP contains confidential information which is subject to the provisions of 18 U.S.C. 1905. Chrysler Corp. v. Brown, 441 U.S. 281, 19 FEP 475 (1979). Copies of this AAP and all related appendices, documents, and support data are made available on loan to the U.S. Government upon the request of said Government on the condition that the Government hold them totally confidential and not release copies to any persons. This AAP and all its supporting documents contain much confidential information which may reveal, directly or indirectly, OFFICE OF THE CHANCELLOR's plans for business or geographical expansion or contraction. OFFICE OF THE CHANCELLOR considers this AAP to be exempt from disclosure, reproduction, and distribution under the Freedom of Information Act upon the grounds, among others, that such material constitutes (1) personnel files, the disclosure of which would constitute a clearly unwarranted invasion of personal privacy, which are exempt from disclosure under 5 U.S.C. 552(b)(6); (2) confidential, commercial, or financial information, which is exempt from disclosure under 5 U.S.C. 552(b)(4); (3) investigatory records compiled for law enforcement purposes, the production of which would constitute an unwarranted invasion of personal privacy, which are exempt from disclosure under 5 U.S.C. 552(b)(7)(C); and (4) matters specifically exempted from disclosure by statute, which are exempt from disclosure under 5 U.S.C. 552(b)(3). Notice is hereby given of a request pursuant to Title 41 Code of Federal Regulations, Part 60-40.3 that portions of this AAP be kept confidential.

OFFICE OF THE CHANCELLOR wishes to make it clear that it does not consent to the release of any information contained in this AAP under the Freedom of Information Act or otherwise. If the U.S. Government, or any agency or subdivision thereof, is considering breaching the conditions under which this AAP was loaned to such Government, or is considering a request for release of this AAP under the Freedom of Information Act, a request is hereby made that the Government immediately notify the Associate Director, HR, Talent Acquisition & Workforce Planning of OFFICE OF THE CHANCELLOR of any and all Freedom of Information Act requests received by the Government or any other contemplated release of this AAP by the Government which relates to information obtained by the Government from the Company. We further request that everyone who has any contact with this AAP, or its supporting data treat such information as totally confidential and that such information not be released to any person. Retention or disclosure of information relating to identifiable individuals may also violate the Privacy Act of 1974.

**THE CALIFORNIA STATE UNIVERSITY AAP  
FOR OFFICE OF THE CHANCELLOR**

**TABLE OF CONTENTS**

**PART I: AFFIRMATIVE ACTION PLAN FOR MINORITIES AND WOMEN.....4**

Table of Contents ..... 5

Chapter 1: Designation of Responsibility ..... 6

Chapter 2: Identification of Problem Areas ..... 10

Chapter 3: Action-Oriented Programs ..... 11

Chapter 4: Internal Audit and Reporting ..... 17

**PART II: AFFIRMATIVE ACTION PLAN FOR PROTECTED VETERANS AND  
INDIVIDUALS WITH DISABILITIES.....18**

Table of Contents ..... 19

Chapter A: Policy Statement..... 20

Chapter B: Review of Personnel Processes ..... 23

Chapter C: Physical and Mental Qualifications..... 24

Chapter D: Reasonable Accommodation to Physical and Mental Limitations..... 25

Chapter E: Harassment ..... 26

Chapter F: External Dissemination of Policy, Outreach and Positive Recruitment ..... 27

Chapter G: Internal Dissemination of Policy ..... 28

Chapter I: Responsibility for Implementation ..... 30

Chapter J: Training ..... 35

Chapter K: Data Collection Analysis..... 36



**PART I: AFFIRMATIVE ACTION PLAN FOR MINORITIES AND WOMEN**

**FOR**

**NOVEMBER 1, 2022 - OCTOBER 31, 2023**

**PART I**

**AAP FOR MINORITIES AND WOMEN**

**TABLE OF CONTENTS**

- CHAPTER 1:** DESIGNATION OF RESPONSIBILITY  
41 C.F.R. § 60-2.17(a)
- CHAPTER 2:** IDENTIFICATION OF PROBLEM AREAS  
41 C.F.R. § 60-2.17(b)
- CHAPTER 3:** ACTION-ORIENTED PROGRAMS  
41 C.F.R. § 60-2.17(c)
- CHAPTER 4:** INTERNAL AUDIT AND REPORTING SYSTEM  
41 C.F.R. § 60-2.17(d)

## **PART I: AAP FOR MINORITIES AND WOMEN**

### **CHAPTER 1: DESIGNATION OF RESPONSIBILITY**

#### **41 C.F.R. § 60-2.17(a)**

As part of its efforts to ensure equal employment opportunity to all individuals, the Chancellor's Office has designated specific responsibilities to various staff to ensure the AAP focuses on all components of the employment system. To that end, the Interim Chancellor, the Vice Chancellor for Human Resources, the Associate Vice Chancellor and Chief of Staff for Human Resources, the Director, HR Services and Learning and Engagement, the Director, HR, Talent Acquisition and Workforce Planning, and those employed as supervisors and managers have undertaken the responsibilities described below.

#### Interim Chancellor

The primary responsibility and accountability for implementing the AAP rests with the Interim Chancellor. This person is responsible, through the Vice Chancellor for Human Resources, Associate Vice Chancellor and Chief of Staff for Human Resources, Director, HR Services and Learning and Engagement, and Director, HR, Talent Acquisition and Workforce Planning, for adherence to the Chancellor's Office's policy of equal employment opportunity and affirmative action. This role includes, but is not limited to, the following duties:

1. Designate appropriate personnel with the responsibility for overseeing, administering, implementing, and monitoring the Chancellor's Office's AAP. Ensure that these personnel are identified in writing by name and job title.
2. Ensure that those designated personnel responsible for all AAP components are given the necessary authority and top management support and staffing to successfully implement their assigned responsibilities.
3. Impart the personal direction that ensures total involvement and commitment to equal employment opportunity programs through the Chancellor's Office's AAP.

#### Vice Chancellor for Human Resources and Associate Vice Chancellor and Chief of Staff for Human Resources

The Vice Chancellor for Human Resources and Associate Vice Chancellor and Chief of Staff for Human Resources are responsible for overall supervision of the AAP and ensure, through the Director, HR Services and Learning and Engagement, the Director, HR, Talent Acquisition and Workforce Planning, and department managers and supervisors, that all relevant policies and procedures are adhered to. Successful implementation of this program is a basis for evaluating the Director, HR Services and Learning and Engagement, and the Director, HR, Talent Acquisition and Workforce Planning' effective work performance. Responsibilities include, but are not limited to, the following:

1. Ensure that the Chancellor's Office adheres to the stated policy of equal employment opportunity and monitors the application of equal employment opportunity policies.
2. Ensure that the AAP is reviewed and updated annually in accordance with the Chancellor's Office's stated policy.
3. Participate in periodic discussions with management, supervision, and all other employed personnel to ensure AAP and equal employment opportunity policies are being followed.
4. Ensure that all current employees are aware of the Chancellor's Office's equal employment opportunity policy and are informed with regard to the AAP and its objectives.
5. Ensure that recruitment advertising is placed in minority and female-oriented publications, as applicable.
6. Responsible for the design and effective implementation of the AAP at all establishments.

Director, HR Services and Learning and Engagement, and Director, HR, Talent Acquisition and Workforce Planning

The Director, HR Services and Learning and Engagement, and the Director, HR, Talent Acquisition and Workforce Planning are responsible for ensuring the directives of the Chancellor, the Vice Chancellor for Human Resources, and the Associate Vice Chancellor and Chief of Staff for Human Resources are implemented. The duties of the Director, HR Services and Learning and Engagement, and Director, HR, Talent Acquisition and Workforce Planning include, but are not limited to, the following:

1. Provide direction to the Chancellor's Office's employees, as necessary, to carry out all actions required to meet the Chancellor's Office's equal employment opportunity and affirmative action commitments.
2. Review, report on, and update the Chancellor's Office's AAP at least on an annual basis in accordance with stated policy.
3. Develop, implement, and maintain audit and reporting systems to measure effectiveness of equal employment opportunity programs, including those that will indicate the need for remedial action and determine the degree to which goals and objectives have been obtained.
4. Advise management in the modification and development of the Chancellor's Office's policies to ensure the enhancement of equal employment opportunity for all employees and potential employees within existing equal employment opportunity guidelines.

5. Conduct periodic audits to ensure all required posters and those advertising the Chancellor's Office's equal employment opportunity policies and AAP are displayed and that the Chancellor's Office's equal employment opportunity and AAP policies are being thoroughly communicated.
6. Assist in review and revision of all policies, procedures, and rules to ensure they are not in violation of federal or state laws and regulations.
7. Review the qualifications of all employees to ensure equitable opportunity, based on job-related employment practices, is given to all for transfers and promotions.
8. Conduct periodic audits of: 1) training programs and hiring and promotion patterns to remove impediments to the attainment of AAP goals and objectives, 2) facilities to ensure they are maintained for the use and benefit of all employees and integrated both in policy and practice, and 3) sponsored educational, training, recreational, and social activities to ensure that all employees are encouraged to participate in accordance with policies on non-discrimination.
9. Periodically analyze applicant flow to determine the mix of persons applying for employment by race/ethnic origin and gender.
10. Review all job descriptions and specifications to ensure they are free of discriminatory provisions and artificial barriers. Ensure that all requirements are job-related, that they are realistic, and that they reflect the actual work requirements of the essential job duties.

### Managers and Supervisors

In their direct day-to-day contact with the Chancellor's Office's employees, managers and supervisors have assumed certain responsibilities to help the Chancellor's Office ensure compliance with equal employment opportunity programs and effective implementation of the AAP. These include, but are not limited to, the following:

1. Aggressively adhere to the Chancellor's Office's equal employment opportunity and affirmative action policy.
  - a. Support and assist the Vice Chancellor for Human Resources, the Associate Vice Chancellor and Chief of Staff for Human Resources, the Director, HR Services and Learning and Engagement, and the Director, HR, Talent Acquisition and Workforce Planning in developing, maintaining, and successfully implementing the AAP.
  - b. Complete progress reports regarding the status of goal achievement.
  - c. Take action to prevent harassment of employees placed through affirmative action efforts.
2. Assign employees to significant jobs that might lead to greater personal growth and value, and counsel them with respect to what is needed for upward mobility within the employment structure.



3. Ensure that all interviews, offers of employment and/or wage commitments are consistent with the Systemwide Recruitment Guidelines and the Chancellor's Office's recruitment process guidelines:

- **Technical Letter HR/Appointments 2013-03 Weblink:**

[https://csyou.calstate.edu/Employee-Resources/employment/Recruitment/Resources/Recruitment\\_Hiring\\_Guide\\_for\\_MPP\\_Staff\\_TL-APPT2013-03.pdf](https://csyou.calstate.edu/Employee-Resources/employment/Recruitment/Resources/Recruitment_Hiring_Guide_for_MPP_Staff_TL-APPT2013-03.pdf)

- **CO Recruitment Guidelines Weblink:**

<https://csyou.calstate.edu/Employee-Resources/employment/Recruitment/Pages/default.aspx>

4. Implement the internal promotion and transfer of all employees under their supervision consistent with AAP goals and objectives.
5. Assist in identifying problem areas and provide needed information for establishing and meeting department affirmative action goals and objectives.

**CHAPTER 2: IDENTIFICATION OF PROBLEM AREAS**  
**41 C.F.R. § 60-2.17(b)**

OFFICE OF THE CHANCELLOR performs in-depth analyses of its total employment process to determine whether and where impediments to equal employment opportunity might exist. At a minimum, OFFICE OF THE CHANCELLOR evaluates:

1. The workforce by organizational unit and AAP job group to determine whether there are problems of minority or female utilization (*i.e.*, employment in the unit or AAP group), or of minority or female distribution (*i.e.*, placement in the different jobs within the unit or AAP job group);
2. Personnel activity (applicant flow, hires, terminations, promotions, and other personnel actions) to determine whether there are selection disparities;
3. Compensation systems to determine whether there is gender-, race-, or ethnicity-based disparities.
4. Selection, recruitment, referral, and other personnel procedures to determine whether they result in disparities in the employment or advancement of minorities or women; and
5. Any other areas that might impact the success of the affirmative action program.

In each case where potential problem areas have been identified, affirmative actions, as appropriate, will be taken consistent with any of the action-oriented programs described in Chapter 3 of this AAP.

**CHAPTER 3: ACTION-ORIENTED PROGRAMS**  
**41 C.F.R. § 60-2.17(c)**

OFFICE OF THE CHANCELLOR tailors our action-oriented programs each year to ensure they are specific to the problem identified.

Action-Oriented Program (AOPs):

The action-oriented programs designed to address the underutilization of women and minorities, the utilization goal set for individuals with disabilities, and the hiring benchmark for the protected veterans are listed below. These action-oriented programs will be carried-out throughout the AAP year. Evaluation of these AOPS will be conducted at least annually. The Interim Chancellor with the help of the managers, will be responsible in ensuring that the following are implemented.

**Recruitment:**

1. OFFICE OF THE CHANCELLOR will continue to place advertisements on job opportunities through local job service offices. The local job service office will be notified concurrent with the placement of any job announcements through other media (e.g., newspapers, using other on-line job posting services such as Indeed.com, Monster.com, LinkedIn, etc.)
2. Due to the extensive technical education and experience required for some positions, OFFICE OF THE CHANCELLOR will also continue to place job opportunity announcements in the university website, and in national newspaper when appropriate.
3. Job advertisements will always carry an appropriate EEO tagline.
4. Minority and female applicants will be considered for all positions for which they are qualified.
5. The Chancellor's Office will attend in-person job fairs if there are sufficient numbers of openings to warrant participation. Please refer to number 8 below for additional information.
6. The Chancellor's Office will continue to provide search committee (SC) training. The SC is responsible for:
  - a. Completing the "Searches in Recruitment in the CSU" training module by SWHR Learning & Development.
  - b. Reviewing a copy of the "What is Unconscious Bias and How to Minimize Unconscious Bias in Recruitment" handout. This will provide hiring managers with a list of various types of unconscious bias.

- c. Reviewing a copy of the Department of Fair Employment and Housing (DFEH) fact sheet. This will provide examples of the types of questions that are acceptable and unacceptable to ask applicants during the interview process.
7. Continue to offer justice, equity, diversity and inclusion (JEDI) training to all employees. This continues to be a priority for the CSU and represents a core component of our mission.
8. The Chancellor's Office commits to attending in-person job fairs to source minority candidates. For this plan year, the CSU and CO was well represented at the 2023 Annual Conference of the American Associate of Blacks in Higher Education as an Exhibitor/Recruiter. We also plan to attend the Asian Pacific Americans in Higher Education (APAHE) and the Hispanic Association of Colleges and Universities (HACU) as an Exhibitor/Recruiter. The Chancellor's Office will also continue to utilize the following recruitment sources: All job postings are on CO Careers, CSU Careers, the Department of Rehabilitation (DOR), Employment Development Department (EDD), Careers in Government, and other specific advertising resources as needed.

**Careers in Government (CIG)**

Their targeted Social Media network reaches 15-million+ users per month. (Twitter, Facebook, Linked In, Instagram. Their partnership with private-sector job boards (Jobs2Careers, Zip Recruiter.com, Glassdoor.com, NEXXT, Appcast, Talroo).

The CSUCO automatically posts all positions on the top (8) eight Diversity websites at:  
africanamericanjobnetwork.com

asianjobnetwork.com

disabilityjobnetwork.com

latinojobnetwork.com

lgbtjobnetwork.com

retirementjobnetwork.com

veteranjobnetwork.netwomensjobnetwork.com

findacaliforniajob.com.

In addition, the following job advertising sources are made available to the hiring manager and search committees to post for an additional fee depending on the type of position.

**Insight Into Diversity**

11132 South Towne Square, Suite 203

St. Louis, MO 63123

Phone: 800-537-0655

Fax: 314-200-9956

Website: <http://www.insightintodiversity.com/>

**VetJobs.com**

PO Box 71445  
Marietta, GA 30007-1445  
Phone: 770-993-5117 or 877-838-5627  
Fax: 770-993-2875  
Website: <http://www.vetjobs.org>

**Diverse Jobs in Higher Education**

10520 Warwick Avenue, Suite B-8  
Fairfax, VA 22030  
Phone: 800-783-3199 OR 703-385-2981 FAX: 703-385-1839  
Website: <http://www.diversejobs.net>

**American Association of Hispanics  
in Higher Education**

1120 S. Cady Mall, 1<sup>st</sup> Floor, Suite B-159  
Tempe, AZ 85297-6303  
Phone: 480-727-8210  
Fax: 480-965-7165  
Website: <http://www.aahhe.org>

**Business & Professional Women/WA**

18109 96<sup>th</sup> Street Court East  
Boney Lake, WA 98391  
Phone: 206-601-4162  
Website: <https://www.bpwwa.org/>

**NATIONAL COUNCIL OF HISPANIC EMPLOYMENT PROGRAM  
MANAGERS**

Website: <http://www.nationalcouncilhepm.org/>

**National Association of Asian American Professionals**

4850 Sugarloaf Parkway, Ste 209-289  
Lawrenceville, GA 30044  
Phone: 919-625-1207  
Website: <http://www.naaap.org>

**National Black MBA Association, Inc.**

Phone: 404-260-5444  
Website: <http://www.nbmbaa.org>

**NATIONAL CONGRESS OF AMERICAN INDIANS**

Website: <http://www.ncai.org/>

**ADVANCING WOMEN**

7315 Oak Lane Road  
Elkins Park, PA 19027  
Phone: 800-396-0227  
Website: <https://careers.advancingwomen.com/>

**PROSPANICA**

Founded by National society of Hispanic MBAs  
2711 LBJ Freeway, Suite 800  
Dallas, TX 75234  
Phone: 877-467-4622  
Website: <https://www.prospanica.org/>

**Employer Assistance Resource Network on Disability Inclusion**

201 I.U. Willets Road  
Albertson, NY 11507  
Phone: 516- 465-1400  
Website: <http://www.askearn.org>

**The Viscardi Center**

**Employ and empower children and adults with disabilities**

201 I.U. Willets Road  
Albertson, NY 11507  
Phone: 516- 465-1519  
Website: <https://www.viscardicenter.org>

**Goodwill Industries of Southern California (disabled)**

342 San Fernando Road  
Los Angeles, CA 90031  
Phone: 323- 223-1211 or 888-446-6394  
Website: <http://www.goodwillsocal.org>

**MILITARY.COM – A MONSTER COMPANY VETERAN EMPLOYMENT CENTER**

Website:  
<https://hiring.monster.com/solutions/hire-veterans.aspx>

**National Association of Black Accountants, Inc**

7474 Greenway Center Drive, Suite 1120  
Greenbelt, MD 20770  
Phone: 301-474-6222  
Fax: 301-474-3114  
Website: <http://www.nabainc.org>

## **PACIFIC ASIAN CONSORTIUM EMPLOYMENT**

1055 Wilshire Boulevard, Suite 1475

Los Angeles, California 90017

Phone: 213-353-3982

Fax: 213-353-1227

Website: <http://www.pacela.org>

### **Job Specifications/Selection Process:**

1. Develop position descriptions that accurately reflect position functions and are consistent for the same position from one location to another.
2. Develop job or worker specifications that contain academic, experience, and skill requirements that do not constitute inadvertent discrimination. Develop specifications that are free from bias with regard to age, race, color, gender, religion, national origin, sexual orientation, gender identity, disability, or veteran status.
3. Make available approved position specifications and worker specifications to all members of management involved in the recruiting, screening, selection, and promotion process. Copies may also be made available to recruiting sources.
4. OFFICE OF THE CHANCELLOR will continue to use only worker specifications that include job-related criteria.
5. OFFICE OF THE CHANCELLOR will continue to carefully select and counsel all personnel involved in the recruiting, screening, selection, promotion, disciplinary, and related processes to eliminate bias in all personnel actions.

### **Job Advancement:**

1. Minority and female employees can be made available for participation in Career Days and related activities in the community, as desired.
2. OFFICE OF THE CHANCELLOR will continue to post or announce job opportunities.
3. OFFICE OF THE CHANCELLOR will continue to make use of the inventory of our current employee skills, when completed, to determine academic, skill, and experience level of individual employees.
4. Establish, whenever feasible, formal career counseling programs to include professional development, education, aid, job rotation, buddy system, and similar program.
5. Require supervisory personnel to submit justification when qualified minority or female employees are passed over for upgrading.
6. Review seniority practices to ensure such practices are non-discriminatory and do not have discriminatory effect.

7. Encourage all employees to participate in facilities and company-sponsored social and recreational activities.
8. OFFICE OF THE CHANCELLOR will continue to use our formal employee evaluation program. The performance Appraisal is used for annual reviews for all employees.



## **CHAPTER 4: INTERNAL AUDIT AND REPORTING**

### **41 C.F.R. § 60-2.17(d)**

Inherent in the AAP is the need for periodic self-assessment of problems encountered, corrective action taken, and progress made. Self-evaluation requires complex record keeping systems on applicants, employees, and components of the AAP itself. Periodic reports from supervisors, department managers, the Director, HR Services and Learning and Engagement, and the Director, HR, Talent Acquisition and Workforce Planning, and other relevant persons are required.

The objective of all record keeping systems to be implemented is to assess the results of past actions, trends, the appropriateness of goals and objectives, the appropriateness and relevancy of identified solutions to problems, and the adequacy of the Plan as a whole. In addition, a further objective is to identify the proper corrective actions to be made to all components.

In order to fully achieve the objectives of such a record keeping system, the results of it must lead to follow-up through feedback to managers, supervisors, and staff, through reallocation of resources, through modifications to plans and the record keeping system itself, through appropriate recognition of personal achievements as well as punitive actions for discriminatory acts. For any identified deficiencies, appropriate corrective action will be identified and implemented.

The records that are maintained are the basis for updating the affirmative action plan, including revising the availability data and establishing annual numerical goals. The internal audit and reporting system is used as the basis for evaluating systemic, results-oriented programs and affirmative action efforts.

The Chancellor's Office auditing and reporting system periodically measures the effectiveness of its total affirmative action program. The Director, HR Services and Learning and Engagement, and the Director, HR, Talent Acquisition and Workforce Planning:

1. 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;
2. Require internal reporting on a scheduled basis as to the degree to which equal employment opportunity and organizational objectives are attained;
3. Review report results with all levels of management; and
4. Advise top management of program effectiveness and submit recommendations to improve unsatisfactory performance.



**PART II: AFFIRMATIVE ACTION PLAN FOR PROTECTED VETERANS AND  
INDIVIDUALS WITH DISABILITIES**

**FOR**

**NOVEMBER 1, 2022 - OCTOBER 31, 2023**

## **PART II**

### **AAP FOR PROTECTED VETERANS AND INDIVIDUALS WITH DISABILITIES**

#### **TABLE OF CONTENTS**

- CHAPTER A:** POLICY STATEMENT  
41 C.F.R. §§ 60-300.44(a); 60-741.44(a)
- CHAPTER B:** REVIEW OF PERSONNEL PROCESSES  
41 C.F.R. §§ 60-300.44(b); 60-741.44(b)
- CHAPTER C:** PHYSICAL AND MENTAL QUALIFICATIONS  
41 C.F.R. §§ 60-300.44(c); 60-741.44(c)
- CHAPTER D:** REASONABLE ACCOMMODATION TO PHYSICAL AND MENTAL LIMITATIONS  
41 C.F.R. §§ 60-300.44(d); 60-741.44(d)
- CHAPTER E:** HARASSMENT  
41 C.F.R. §§ 60-300.44(e); 60-741.44(e)
- CHAPTER F:** EXTERNAL DISSEMINATION OF POLICY, OUTREACH AND POSITIVE RECRUITMENT  
41 C.F.R. §§ 60-300.44(f); 60-741.44(f)
- CHAPTER G:** INTERNAL DISSEMINATION OF POLICY  
41 C.F.R. §§ 60-300.44(g); 60-741.44(g)
- CHAPTER H:** AUDIT AND REPORTING SYSTEM  
41 C.F.R. §§ 60-300.44(h); 60-741.44(h)
- CHAPTER I:** RESPONSIBILITY FOR IMPLEMENTATION  
41 C.F.R. §§ 60-300.44(i); 60-741.44(i)
- CHAPTER J:** TRAINING  
41 C.F.R. §§ 60-300.44(j); 60-741.44(j)

**CHAPTER A: POLICY STATEMENT**  
**41 C.F.R. §§ 60-300.44(a); 60-741.44(a)**

It is the policy of OFFICE OF THE CHANCELLOR and my personal commitment that equal employment opportunity be provided in the employment and advancement for all persons regardless of race, religion, color, national origin, sex, age, sexual orientation/gender identity and status as a protected veteran or individual with a disability at all levels of employment, including the executive level. OFFICE OF THE CHANCELLOR does not and will not discriminate against any applicant or employee regardless of race, religion, color, national origin, sex, age, sexual orientation/gender identity and status as a protected veteran and/or individual with a disability to any position for which the applicant or employee is qualified. In addition, OFFICE OF THE CHANCELLOR is committed to a policy of taking affirmative action to employ and advance in employment qualified protected veteran employees and qualified employees with disabilities at all levels, including the executive level. Such affirmative action shall apply to all employment practices, including, but not limited to hiring, upgrading, demotion or transfer, recruitment, recruitment advertising, layoff or termination, rates of pay or other forms of compensation, and selection for training, including apprenticeship and on-the-job training. Decisions related to personnel policies and practices shall be made based on an individual's capacity to perform a particular job and the feasibility of any necessary job accommodation. OFFICE OF THE CHANCELLOR will make every effort to provide reasonable accommodations to any physical and mental limitations of individuals with disabilities and to disabled veterans.

1. Employees and applicants shall not be subjected to harassment, intimidation, threats, coercion, or discrimination because they have engaged in or may engage in any activity protected by state, federal or local anti-discrimination laws including the following activities:
2. Filing a complaint;
3. Assisting or participating in an investigation, compliance evaluation, hearing, or any other activity related to the administration of the affirmative action provisions of the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended (VEVRAA) or any other Federal, state or local law requiring equal opportunity for disabled veterans, recently separated veterans, active wartime or campaign badge veterans, or Armed Forces service medal veterans or Section 503 of the Rehabilitation Act of 1973, as amended (Section 503) or any other federal, state or local law requiring equal opportunity for disabled persons;
4. Opposing any act or practice made unlawful by VEVRAA or its implementing regulations or any other federal, state, or local law requiring equal opportunity for disabled veterans, recently separated veterans, active wartime or campaign badge veterans, or Armed Forces service medal veterans or section 503 or its implementing regulations or any other federal, state, or local law requiring equal opportunity for disabled persons; or

5. Exercising any other right protected by VEVRAA or Section 503 or their implementing regulations.

Our obligations in this area stem from not only adherence to various state and federal regulations, but also from our commitment as an employer in this community to provide job opportunities to all persons regardless of race, religion, color, national origin, sex, age, sexual orientation, gender identity and status as a protected veteran or an individual with disability. OFFICE OF THE CHANCELLOR's EEO policy and affirmative action obligations include the full support from Interim Chancellor, Jolene Koester.

Director, HR, Talent Acquisition & Workforce Planning has been delegated as the person in charge of overseeing the annual preparation and implementation of the Affirmative Action Program. OFFICE OF THE CHANCELLOR will also continually design and implement audit and reporting systems that will measure the effectiveness and the compliance of the AAP, identify the need for remedial actions, determine if objectives were attained, and determine if opportunities to participate in company-sponsored activities were extended to all employees and applicants.

The OFFICE OF THE CHANCELLOR is also committed to abiding with the Pay Transparency Nondiscrimination Provisions and therefore, will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. The OFFICE OF THE CHANCELLOR's employees who have access to the compensation information of other employees or applicants as part of their essential job functions are informed and trained to not disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) a response to a formal complaint or charge; (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with the OFFICE OF THE CHANCELLOR's legal duty to furnish the information.

It is also OFFICE OF THE CHANCELLOR's policy not to discriminate because of a person's relationship or association with a protected veteran. This includes spouses and other family members. Also, OFFICE OF THE CHANCELLOR will safeguard the fair and equitable treatment of protected veteran spouses and family members regarding all employment actions and prohibit harassment of applicants and employees because of their relationship or association with a protected veteran.

If you have any questions regarding our equal employment opportunity, harassment policies or the complaint procedure, you may contact your local Human Resources representative. Parts of the Affirmative Action Plan may be reviewed, as appropriate, by making an appointment with a local Human Resources representative.



---

(Signature)

Jolene Koester  
Interim Chancellor

11/01/2022

**CHAPTER B: REVIEW OF PERSONNEL PROCESSES**  
**41 C.F.R. §§ 60-300.44(b); 60-741.44(b)**

To ensure that all personnel activities are conducted in a job-related manner which provides and promotes equal employment opportunity for all known protected veterans and employees and applicants with disabilities, reviews are periodically made of the Company's examination and selection methods to identify barriers to employment, training, and promotion.

1. OFFICE OF THE CHANCELLOR periodically conducts a review of its employment processes to ensure thorough and systematic consideration of the job qualifications of 1) known protected veteran applicants and employees; and 2) applicants and employees with disabilities for job vacancies filled either by external hiring or internal promotions/transfers, as well as for all training opportunities available. To determine whether an individual is qualified for a particular job, a close examination of the content of the job is made, as well as a review of the job qualifications of known protected veterans and individuals with disabilities, both applicants and employees. In determining the qualifications of a protected veteran, consideration is given only to that portion of the military record, including discharge papers, relevant to the job qualifications for which the veteran is being considered.
2. The company ensures that its personnel processes do not stereotype individuals with disabilities or protected veterans in a manner which limits their access to jobs for which they are qualified.
3. The company ensures that applicants and employees with disabilities have equal access to its personnel processes, including those implemented through information and communication technologies.
4. The company provides reasonable accommodations, unless such accommodations will cause undue hardship to the company, to applicants and employees with disabilities to ensure that equal employment opportunity are extended in the operation of its personnel processes.
5. The company ensures that information and communications systems are accessible to all employees and applicants with disabilities even in the absence of a specific request for accommodation.

**CHAPTER C: PHYSICAL AND MENTAL QUALIFICATIONS**  
**41 C.F.R. §§ 60-300.44(c); 60-741.44(c)**

To ensure that all physical and mental qualifications and requirements are job-related and promote equal employment opportunity for all known protected veterans and employees and applicants with qualified disabilities, reviews are periodically made of the Company's physical and mental qualifications and requirements as they relate to employment, training, and promotion.

The Chancellor's Office's physical and mental job requirements are reviewed to determine whether they are job-related and consistent with business necessity and safe performance on the job.

Schedule for Review: Any previously reviewed classification will be reviewed again if there is a change in working conditions which affects the job's physical or mental requirements (e.g., new requirements, new equipment, etc.)



**CHAPTER D: REASONABLE ACCOMMODATION TO PHYSICAL AND  
MENTAL LIMITATIONS**

**41 C.F.R §§ 60-300.44(d); 60-741.44(d)**

OFFICE OF THE CHANCELLOR will make every effort to provide reasonable accommodations to physical and mental limitations of applicants and employees with disabilities or who are disabled veterans unless it can demonstrate that the accommodations would impose an undue hardship on the operation of business. Such reasonable accommodations are implemented in the company's electronic and/or online application systems. The company ensures that qualified applicants and employees with disabilities, who are unable to fully utilize the system, are provided equal opportunities to apply and be considered for all jobs. OFFICE OF THE CHANCELLOR will confidentially review performance issues of employees with known disabilities to determine whether a reasonable accommodation is needed when: (a) the employee is having significant difficulty with job performance, and (b) it is reasonable to conclude that the problem is related to the known disability.

Employees may notify their direct supervisor or contact the HR department at any time to formally request an accommodation.

**CHAPTER E: HARASSMENT**  
**41 C.F.R. §§ 60-300.44(e); 60-741.44(e)**

OFFICE OF THE CHANCELLOR has developed and implemented a set of procedures to ensure that its employees with disabilities and protected veterans are not harassed due to protected characteristics. A copy of the policy prohibiting discrimination, harassment, sexual misconduct, sexual exploitation, dating violence, domestic violence, stalking, and retaliation (Nondiscrimination Policy), which includes a section prohibiting harassment of individuals with disabilities and/or protected veterans are available for distribution to new as well as to existing employees.

The Chancellor's Office also takes affirmative steps to ensure policies and procedures are implemented to meet the State of California laws prohibiting discrimination and harassment in employment.

**CHAPTER F: EXTERNAL DISSEMINATION OF POLICY, OUTREACH AND  
POSITIVE RECRUITMENT**

**41 C.F.R. §§ 60-300.44(f); 60-741.44(f)**

Based upon OFFICE OF THE CHANCELLOR's review of its personnel policies as described in Chapter B, the following activities will be implemented or continued to further enhance our affirmative action efforts. All activities are the responsibility of the Director, HR, Talent Acquisition & Workforce Planning.

1. Undertake appropriate outreach and positive recruitment activities that are reasonably designed to effectively recruit protected veterans and individuals with disabilities.
2. List with the State Employment Development Department all suitable job openings.

The exemptions for posting jobs are when positions are,

- a. executive and top management positions,
  - b. positions that will be filled from within the contractor's organization,
  - c. and positions lasting three days or less.
3. Send written notification of the Chancellor's Office's affirmative action policy to all subcontractors, vendors, and suppliers requesting appropriate action on their part.
  4. Annually review the outreach and recruitment efforts taken over the previous twelve months to evaluate their effectiveness in identifying and recruiting qualified protected veterans and individuals with disabilities. Identify and implement alternative efforts, if previous efforts are not effective.
  5. Ensure that activities undertaken to comply with the obligations of this section are documented and such documents are retained for a period of three (3) years.

**CHAPTER G: INTERNAL DISSEMINATION OF POLICY**  
**41 C.F.R. §§ 60-300.44(g); 60-741.44(g)**

To gain positive support and understanding for the affirmative action program for protected veterans and individuals with disabilities OFFICE OF THE CHANCELLOR will implement or continue to implement the following internal dissemination procedures, all of which are the responsibility of the Director, HR, Talent Acquisition & Workforce Planning. The following policies and procedures are designed to foster support and understanding from OFFICE OF THE CHANCELLOR's executive staff, management, supervisors, and other employees to encourage all employees to take the necessary actions to aid OFFICE OF THE CHANCELLOR in meeting its obligations.

1. Include the policy in the OFFICE OF THE CHANCELLOR's policy manual and other in-house publications.
2. Schedule training sessions for all employees involved in recruiting, selection, promotion, and other related employment issues for protected veterans and individuals with disabilities.
3. Discuss the policy thoroughly in both employee orientation and management training programs.
4. If applicable, inform union officials of the contractor's policy, and request their cooperation.
5. Post the policy on Company bulletin boards, along with the Company's harassment policy which includes protection from harassment on the basis of disability.

**CHAPTER H: AUDIT AND REPORTING SYSTEM**  
**41 C.F.R. §§ 60-300.44(h); 60-741.44(h)**

OFFICE OF THE CHANCELLOR has developed and currently implements an audit and reporting system that addresses the following:

1. Measures the effectiveness of OFFICE OF THE CHANCELLOR's overall affirmative action program and whether the company is in compliance with specific obligations.
2. Indicates the need for remedial action. Any corrective actions will be the responsibility of the Director, HR, Talent Acquisition & Workforce Planning.
3. Measures the degree to which OFFICE OF THE CHANCELLOR's objectives are being met.
4. Whether there are any undue hurdles for individuals with disabilities and protected veterans regarding company sponsored educational, training, recreational, and social activities. This will also include, but not limited, to the review of the on-line and electronic application system to determine their accessibility and ensuring that procedures to request for accommodations are prominently displayed and that individuals with disabilities can readily obtain the needed accommodation.
5. Ensures that outreach activities are documented and that such documents are kept for at least a period of three (3) years.

**CHAPTER I: RESPONSIBILITY FOR IMPLEMENTATION**  
**41 C.F.R. §§ 60-300.44(i); 60-741.44(i)**

As part of its efforts to ensure equal employment opportunity to protected veterans and individuals with disabilities, OFFICE OF THE CHANCELLOR has designated Director, HR, Talent Acquisition & Workforce Planning with overall responsibility of preparing and implementing the organization's annual affirmative action programs in accordance with the OFCCP's regulations.

Chancellor

The Chancellor is responsible for providing top management support for the Chancellor's Office's AAP. This person issues a memo annually to reaffirm the Chancellor's Office's Equal Employment Opportunity Policy and to make known to all employees and applicants the commitment of Senior Management to EEO and affirmative action. Additional responsibilities include, but are not limited to:

1. Designating appropriate personnel with the responsibility for overseeing, administering, implementing, and monitoring the Chancellor's Office's AAP. Ensuring that these personnel are identified in writing by name and job title.
2. Ensuring that designated personnel responsible for all AAP components are given the necessary authority and top management support and staffing to successfully implement their assigned responsibilities.
3. Imparting the personal direction that ensures total involvement and commitment to equal employment opportunity programs through the Chancellor's Office's AAP.

Vice Chancellor for Human Resources and Associate Vice Chancellor and Chief of Staff for Human Resources

The Vice Chancellor for Human Resources and the Associate Vice Chancellor and Chief of Staff for Human Resources are responsible for overall supervision of the AAP and ensure, through the Director, HR Services and Learning and Engagement, the Director, HR, Talent Acquisition and Workforce Planning, and department managers and supervisors, that all relevant policies and procedures are adhered to. Successful implementation of this program is a basis for evaluating the Director, HR Services and Learning and Engagement, and the Director, HR, Talent Acquisition and Workforce Planning' effective work performance. Responsibilities include, but are not limited to, the following:

1. Presenting all needed recommendations and procedural changes to Senior Management concerning EEO and affirmative action and ensuring that Senior Management is kept informed of the Chancellor's Office's compliance status.
2. Maintaining Company-wide management support and cooperation for the Chancellor's Office's AAP.

3. Collaborating with Senior Management on EEO and AAP issues.
4. Responsible for ensuring overall the Chancellor's Office's compliance with the AAP.
5. Ensuring that the AAP is updated annually for all establishments.
6. Providing guidance and direction to the Director, HR Services and Learning and Engagement, and the Director, HR, Talent Acquisition and Workforce Planning.
7. Ensuring that relevant staff, (i.e., Director, HR Services and Learning and Engagement, Director, HR, Talent Acquisition and Workforce Planning, managers, and supervisors) are aware that their work performance is being evaluated in part on the basis of their equal employment opportunity efforts and results.
8. Ensuring the Chancellor's Office's VETS-4212 form is filed annually with the Veterans' Employment and Training Service (VETS).

Director, HR Services and Learning and Engagement and Director, HR, Talent Acquisition and Workforce Planning

The Director, HR Services and Learning and Engagement, and the Director, HR, Talent Acquisition and Workforce Planning are also responsible for ensuring that the directives of the Chancellor, the Vice Chancellor for Human Resources, and the Associate Vice Chancellor and Chief of Staff for Human Resources are implemented. Duties of the Director, HR Services and Learning and Engagement, and the Associate Director, HR, Talent Acquisition and Workforce Planning include, but are not limited to, the following:

1. Providing direction to the Chancellor's Office's employees, as necessary, to carry out all actions required to meet the Chancellor's Office's equal employment opportunity and affirmative action commitments.
2. Responsible for the design and effective implementation of the AAP at all establishments.
3. Developing, implementing, and maintaining audit and reporting systems to measure effectiveness of equal employment opportunity programs, including those that will
  - a. Indicate need for remedial action,
  - b. Determine degree to which goals and objectives have been obtained.
4. Advising management in the modification and development of the Chancellor's Office's policies to ensure the enhancement of equal employment opportunity for all employees and potential employees within existing equal employment opportunity guidelines.
5. Identifying problem areas and establishing procedures, goals and objectives to solve these problems.

6. Providing guidelines in the development, preparation, and implementation of career counseling programs for known protected veterans and employees with disabilities.
7. The Chancellor's Office conducts periodic audits to ensure that all required posters and the equal employment opportunity policies and AAP are displayed properly. The Chancellor's Office also conducts audits to ensure that the Invitation to Self-Identify (pre and post-offer) for protected veterans and individuals with disabilities, the Chancellor's Office's equal employment opportunity, and AAP policies are being utilized appropriately and thoroughly communicated.
8. Ensure that employees are re-surveyed regarding their disability status every five (5) years and send out reminders to employees, at least once during the five (5) year intervals, that they may voluntarily update their disability status at any time.
9. Developing policy statements, affirmative action programs, internal and external communication techniques.
10. Assisting line management in arriving at solutions to problems.
11. Serving as the liaison between the Chancellor's Office and enforcement agencies.
12. Serving as the liaison between the Chancellor's Office and organizations and community action groups for protected veterans and individuals with disabilities, in addition to ensuring that representatives are involved in community service programs of local organizations for protected veterans and individuals with disabilities.
13. Keeping management informed of the latest developments in the equal employment opportunity area.
14. Reviewing, reporting on, and updating the AAP annually in accordance with stated policy. Informing employees and applicants of significant changes.
15. Working closely with the Vice Chancellor for Human Resources, the Associate Vice Chancellor and Chief of Staff for Human Resources, and department managers and supervisors in coordinating the effective implementation of all identified affirmative actions.
16. Assisting in review and revision of all policies, procedures, and rules to ensure they are not in violation of federal or state laws and regulations.
17. Assisting line management in arriving at solutions to EEO/AA problems.
18. Reviewing results of audit and reporting systems to assess the effectiveness of the Chancellor's Office's AA programs and to direct corrective actions where necessary.



19. Providing guidance to managers and supervisors in taking proper action to prevent employees from being harassed in any way, through one-on-one contact, training, and disciplinary action.
20. Reviewing the qualifications of all employees to ensure equitable opportunity, based on job-related employment practices, is given to all for transfers and promotions.
21. Conducting periodic audits of: 1) training programs and hiring and promotion patterns to remove impediments to the attainment of AAP goals and objectives, and 2) the Chancellor's Office's sponsored educational, training, recreational, and social activities to ensure that all employees are encouraged to participate in accordance with policies on non-discrimination. Determine whether known protected veterans and employees with disabilities have had the opportunity to participate in all Company-sponsored educational, training, recreation and social activities.
22. Reviewing all job descriptions and specifications to ensure they are free of discriminatory provisions and artificial barriers. Ensuring that all requirements are job-related, that they are realistic, and that they reflect the actual work requirements of the essential job duties.

#### Managers and Supervisors

In their direct day-to-day contact with the Chancellor's Office's employees, managers and supervisors have assumed certain responsibilities to help the Chancellor's Office ensure compliance with equal employment opportunity programs and effective implementation of the AAP. These include, but are not limited to the following:

1. Aggressively adhering to the Chancellor's Office's equal employment opportunity policy.
2. Supporting and assisting the Vice Chancellor for Human Resources, the Associate Vice Chancellor and Chief of Staff for Human Resources, the Director, HR Services and Learning and Engagement, and the Director, HR, Talent Acquisition and Workforce Planning in developing, maintaining, and successfully implementing the AAP.
3. Completing progress reports regarding the status of affirmative action programs.
4. Taking action to prevent harassment of employees placed through affirmative action efforts.
5. Assigning employees to significant jobs that might lead to greater personal growth and value, and counsel them with respect to what is needed for upward mobility within the employment structure.
6. Ensuring that all interviews, offers of employment and/or wage commitments are consistent with the Chancellor's Office's policy.

7. Implementing the internal promotion and transfer of all employees under their supervision consistent with AAP goals and objectives.
8. Assisting in identifying problem areas and providing needed information for establishing and meeting department affirmative action goals and objectives.
9. Seeking and sharing information on feasible accommodations which have been or could be made for known disabilities.

**CHAPTER J: TRAINING**  
**41 C.F.R. §§ 60-300.44(j); 60-741.44(j)**

OFFICE OF THE CHANCELLOR trains all employees involved with the recruitment, selection, promotion, disciplinary actions, training, and related processes of individuals with disabilities or protected veterans to ensure commitment to the company's stated affirmative action goals.

**CHAPTER K: DATA COLLECTION ANALYSIS**  
**41 C.F.R. §§ 60-300.44(k); 60-741.44(k)**

CSU Office of the Chancellor has adopted the current national percentage of veterans in the civilian labor force of 5.5% as its hiring benchmark for protected veterans. OFFICE OF THE CHANCELLOR will update its hiring benchmark as new data is published and updated via the OFCCP's website. The 5.5% hiring benchmark is applied to each job group within OFFICE OF THE CHANCELLOR.

CSU Office of the Chancellor also adopted the current national utilization goal of 7.0% for qualified individuals with disabilities. CSU Office of the will update its utilization goal as new data becomes available, updated and published. The 7.0% utilization goal is applied *to each job group* within CSU Office of the Chancellor.

CSU Office of the Chancellor has collected the required data and conducted studies to identify areas of opportunities in the employment of protected veterans and individuals with disabilities. CSU Office of the will continue to monitor and update these studies periodically during each AAP year. In each case where the hiring benchmark for protected veterans and/or the utilization goal for individuals with disabilities are not met, affirmative actions, as appropriate, will be taken consistent with the activities mentioned in Chapter F (External Dissemination of Policy and Outreach and Positive Recruitment) and measures described in Chapter H (Internal Audit and Reporting) of this AAP.