AFFIRMATIVE ACTION PLAN (AAP)

EXECUTIVE ORDER 11246

Texas A&M University - Corpus Christi

January 1, 2013 through December 31, 2013

EIN: 74-1760663

PART I: AAP FOR MINORITIES AND WOMEN

PART II: AAP FOR COVERED VETERANS AND PERSONS WITH DISABILITIES

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INTRODUCTION TO PARTS I AND II

BACKGROUND

Texas A&M University - Corpus Christi is a federal government supply and service contractor subject to the affirmative action requirements of Executive Order 11246, the Rehabilitation Act of 1973 as amended, and the Vietnam Veterans' Readjustment Assistance Act of 1974, Section 4212. Because Texas A&M University - Corpus Christi has $50,000 or more in annual contracts with the federal government and employs 50 or more employees, we are required to prepare annual written Affirmative Action Plans (AAP's) for minorities and women, for covered veterans, and for persons with disabilities. Failure to comply with these laws and their implementing regulations, which are enforced by the Office of Federal Contract Compliance Programs (OFCCP), can result in debarment of the University from future contracts and subcontracts.

Affirmative Action is a term that encompasses any measure adopted by an employer to correct or to compensate for past or present discrimination or to prevent discrimination from recurring in the future. Affirmative Action goes beyond the simple termination of a discriminatory practice.

As stipulated in federal regulations, a prerequisite to the development of a satisfactory Affirmative Action Plan is the evaluation of opportunities for protected group members, as well as an identification and analysis of problem areas inherent in their employment. Also, where a statistical analysis of the employee workforce reveals a numeric disparity between incumbency and availability of minorities or women, an adequate AAP details specific affirmative action steps to guarantee equal employment opportunity. These steps are keyed to the problems and needs of protected group members. For minorities and women, such steps include the development of hiring and promotion goals to rectify the disparity between incumbency and availability. It is toward this end that the following AAP of Texas A&M University - Corpus Christi was developed.

APPLICABLE AFFIRMATIVE ACTION LAWS AND REGULATIONS

Texas A&M University - Corpus Christi's AAP for minorities and women (Part I) has been prepared according to Executive Order No. 11246, as amended, and Title 41, Code of Federal Regulations, Part 60-1 (Equal Employment Opportunity Duties of Government Contractors), Part 60-2 (Affirmative Action Programs of Government Non-Construction Contractors; also known as "Revised Order No. 4"), and Part 60-20 (Sex Discrimination Guidelines for Government Contractors).

The Veterans Employment Opportunities Act of 1998 (VEOA), Public Law 105-339, effective October 31, 1998, increased the threshold for coverage under VEVRAA from a contract of $10,000, or more to a contract of $25,000 or more; extended the law’s protections to “veterans who served on active duty during a war or in a campaign for which a campaign badge was authorized; and, provides temporary (up to one year) protection to veterans who do not have a service connected disability, did not see action in a foreign war and did not serve during the Vietnam era.

The Jobs for Veterans Act (JFVA), Public Law 107-288, effective December 1, 2003, increased the threshold for coverage under 38 U.S.C. §4212 from $25,000 to $100,000; grants VEVRAA protection to those veterans who, while serving on active duty in the Armed Forces, participated in a United States military operation for which an Armed Forces service medal was awarded pursuant to Executive Order 12985 (62 Fed. Reg. 1209); changes the definition of “recently separated veteran” to include “any veteran during the three-year period beginning on the date of such veteran’s discharge or release from active duty”; changes “Disabled Veterans” to “Disabled Veterans,” expanding the coverage to conform to 38 U.S.C. § 4211 (3); and, following publication of the final regulations, requires contractors to post job listings with their local employment service delivery system.

PROTECTED GROUPS

Coverage under affirmative action laws and regulations applies to:

Women and minorities who are recognized as belonging to or identifying with the following race or ethnic groups: Blacks/African Americans, Hispanics/Latinos, Asians/Pacific Islanders, and American Indians/Alaskan Natives.

Any veteran 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 who was discharged or released from active duty because of a service-connected disability.

Recently separated veterans: any veteran currently within three-years of discharge or release from active duty.

Veterans who received an “Armed Forces Service Medal.”

Other protected veterans 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

An individual with a disability: a person who has a physical or mental impairment that substantially limits one or more of his/her major life activities; (2) has a record of such impairment, or (3) is regarded as having such an impairment.
PROGRAM TERMINOLOGY

The terms, "comparison of incumbency to availability," "deficiency," and "problem area," appearing in this AAP, are terms Texas A&M University - Corpus Christi is required by government regulations to use. The criteria used in relation to these terms are those specified by the government. These terms have no independent legal or factual significance whatsoever. Although Texas A&M University - Corpus Christi will use the terms in total good faith in connection with its AAP, such use does not necessarily signify that the University agrees that these terms are properly applied to any particular factual situation and is not an admission of non-compliance with EEO laws, regulations, and objectives.

The comparison of incumbency to availability contained herein is required by Government regulations to be based on certain statistical comparisons. Geographic areas and sources of statistics used herein for these comparisons were used in compliance with Government regulations, as interpreted by Government representatives. The use of certain geographic areas and sources of statistics does not indicate Texas A&M University - Corpus Christi’s agreement that the geographic areas are appropriate in all instances of use or that the sources of statistics are the most relevant. The use of such geographic areas and statistics may have no significance outside the context of this AAP. Such statistics and geographic areas will be used, however, in total good faith with respect to this AAP.

The grouping of job titles into a given job group does not suggest that Texas A&M University - Corpus Christi believes the jobs so grouped are of comparable worth.

Whenever the term "goal" is used, it is expressly intended that it "should not be used to discriminate against any applicant or employee because of race, color, religion, gender, or national origin," as stated in Title 41 Code of Federal Regulations, Part 60-2.16(e)(2).

This AAP is not intended to create any contractual or other rights in any person or entity.

RELIANCE ON EEOC'S GUIDELINES

Although Texas A&M University - Corpus Christi does not believe any violation of Title VII of the Civil Rights Act exists, it has developed this AAP in accordance with and in reliance upon the EEOC's Guidelines on Affirmative Action, Title 29 Code of Federal Regulations, Part 1608.

REPORTING PERIOD

This AAP is designed to cover the following reporting period: 1/01/2013 – 12/31/2013.
STATEMENT OF PURPOSE FOR PARTS I AND II

This AAP has been designed to bring women and members of minority groups into all levels and segments of Texas A&M University - Corpus Christi's workforce in proportion to their representation in the qualified relevant labor market.

The AAP, therefore, is a detailed, results-oriented set of procedures which, when carried out, results in full compliance with equal employment opportunity requirements through the equal treatment of all people.

The manner in which this is to be accomplished becomes technical and somewhat complicated. There are several reasons for this. First, Texas A&M University - Corpus Christi is subject to and must address a variety of State and Federal laws and guidelines dealing with equal employment opportunity and affirmative action. These guidelines and requirements are in themselves somewhat technical and complex. In addition, relevant court decisions, which are often useful in interpreting, but sometimes conflicting with these requirements and guidelines, must be taken into account when developing and implementing the AAP. Furthermore, in determining Texas A&M University - Corpus Christi's current equal employment opportunity and affirmative action position and its desired future achievements, numbers, percentages, statistics, and numerous calculations and computations must come into play.

The technical, legal, and mathematical aspects of the AAP, however, all have one common purpose—to allow us to properly identify three key concepts:

1. Where we stand now,
2. Where we must go,
3. How best to get there.

These three concepts are further examined in the Affirmative Action Plan.
PART I: AFFIRMATIVE ACTION PLAN FOR MINORITIES AND WOMEN

1/01/2013 – 12/31/2013
PART I

AAP FOR MINORITIES AND WOMEN

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WORKFORCE ANALYSIS

Texas A&M University - Corpus Christi conducted a workforce analysis to identify by gender and race/ethnicity in each job title. The data was collected from payroll records dated 12/31/2013.

Job titles are listed by organizational unit. Job titles are listed from lowest to highest paid. The list includes all job titles, including departmental supervision, exempt, and nonexempt titles. For each job title, the lower threshold of the salary range is provided.

For each job title, Texas A&M University - Corpus Christi identified the total number of employees, the number of male and female employees, the total number of minority employees, the male and female minority employees, the total number of White, Black, Hispanic, Asian or Pacific Islander, American Indian or Alaskan Native employees, and the male and female employees within each of these race/ethnic groups.

Texas A&M University - Corpus Christi carefully analyzed the workforce analysis to identify problem areas needing correction, such as concentrations or segregation of minorities or women by organizational unit, job, or pay. Problems, if any, are identified in Chapter 8: Identification of Problem Areas; programs to correct the identified problems are identified in Chapter 9: Action-Oriented Programs.

See Exhibit 1 for a copy of the Workforce Analysis for each organizational unit.
CHAPTER 2: JOB GROUP ANALYSIS
41 C.F.R. § 60-2.12

Although the workforce analysis was conducted individually for every job title, after it was completed, job titles were grouped for the comparison of incumbency to availability and for setting goals. There were several reasons for grouping jobs.

Many job titles are so similar in content that handling them individually in the AAP is not necessary. Grouping together these very similar titles is appropriate for the comparison of incumbency to availability. For many job titles, the availability data that can be collected is limited, and the same data must be used for several related jobs. Therefore, grouping these related titles together is logical. Also, many job titles have so few incumbents in them that identifying disparities between incumbency and availability by job title is meaningless—as problem areas would be identified in terms of fractions of people. By grouping several similar titles and increasing the number of employees involved, a meaningful comparison can be conducted; any identified problem areas are more likely to be in terms of whole people. Consequently, goals established to correct problem areas are also more likely to be in terms of whole people.

The three reasons for grouping job titles all discuss "similar" or "related" jobs. That is the most critical guideline in creating job groups. Above all, the job titles placed into a job group must be more similar or related to each other than the job titles in other job groups.

Job groups must have enough incumbents to permit meaningful comparisons of incumbency to availability and goal setting. Ideally, if a job group is identified as containing a problem area, it should be large enough that a goal of a least one whole person can be established. No minimum size has been established for this purpose, however, since it is dependent not only on the size of the job group, but also on the size of the availability percentage and the number of minorities or women already employed in the job group.

Texas A&M University - Corpus Christi did not combine job titles with different content, wages, or opportunities if doing so would have obscured problem areas (e.g., job groups which combine jobs in which minorities or women are concentrated with jobs in which they are underrepresented).
CHAPTER 3: PLACEMENT OF INCUMBENTS IN JOB GROUPS
41 C.F.R. § 60-2.13

Each job group appears on a Job Group Report with a job group name and number. The report lists each job title in the job group. For each job title, the worksheet provides the following information: EEO reporting category, pay grade, job title, employee headcounts for each job title, and overall percentages by gender and race/ethnicity as of 12/31/2013.
"Availability" is an estimate of the proportion of each sex and race/ethnic group available and qualified for employment at Texas A&M University - Corpus Christi for a given job group in the relevant labor market during the life of the AAP. Availability indicates the approximate level at which minorities and women could reasonably be expected to be represented in a job group if Texas A&M University - Corpus Christi’s employment decisions are being made without regard to gender, race, or ethnic origin. Availability estimates, therefore, are a way of translating equal employment opportunity into concrete numerical terms. Correct comparisons of incumbency to availability, worthwhile and attainable goals, and real increases in employment for problem groups depend on competent and accurate availability analyses. With valid availability data, we can compare the percentages of those who could reasonably be expected to be employed versus our current employment (from the workforce analysis), identify problem areas or areas of deficiency, and establish goals to correct the problems.

Steps in Comparison of Incumbency to Availability

Identify Availability Factors

The following availability factors are required of federal government contractors for consideration when developing availability estimates for each job group:

   a. Local labor area:
   b. Reasonable labor area: Corpus Christi Metropolitan Statistical Area (MSA), State of Texas, and National as appropriate.

2. Internal Factor: The percentage of minorities or women among those promotable, transferable, and trainable within TAMU-CC.

Assign Internal and External Factor Weights: Weights were assigned to each factor for each job group. A combination of historical data and experience were used to determine the weights. Weights were never assigned in an effort to hide or reduce problem areas.

Identify Final Availability: Weights were multiplied by the component-specific data to produce weighted data for each component. Weighted data for each component was summed. This produced a final availability estimate for each sex and race/ethnic group, as well as for minorities in the aggregate.

See Exhibit 2 for a copy of Availability analysis reports for each job group.
CHAPTER 5: COMPARING INCUMBENCY TO AVAILABILITY
41 C.F.R. § 60-2.15

Once final availability estimates were made for each job group, Texas A&M University - Corpus Christi compared the percentage of incumbents in each job group to their corresponding availability. A comparison was made between the percentage employed as of 12/31/2013 and that group's final availability.

See Exhibit 3 for the percentage Goals for each job group.
CHAPTER 6: PLACEMENT GOALS
41 C.F.R. § 60-2.16

Texas A&M University - Corpus Christi has established a percentage annual placement goal whenever it found that minority or female representation within a job group was less than would reasonably be expected given their availability using the four-fifths (80%) rule. In each case, the goal was set at the availability figure derived for women and/or minorities, as appropriate for that job group. These goals take into account the availability of basically qualified persons in the relevant labor area. They also take into account anticipated employment opportunities with our organization. Texas A&M University - Corpus Christi believes these goals are attainable. These goals will be reached primarily through recruiting and advertising to increase the pool of qualified minority and female applicants and through implementation of our action-oriented programs (see Chapter 9). Selections will occur only from among qualified applicants. Goals do not require the hiring of persons when there are no vacancies or the hiring of a person who is less likely to do well on the job ("less qualified") over a person more likely to do well on the job ("better qualified"), under valid selection procedures. Goals do not require that Texas A&M University - Corpus Christi hire a specified number of minorities or women.

Goals are not rigid and inflexible quotas that must be met, but are instead targets reasonably attainable by means of applying every good faith effort to make all aspects of the entire AAP work. A goal is a guidepost against which Texas A&M University - Corpus Christi, a community group, or a compliance agency can measure progress in remedying identified deficiencies in Texas A&M University - Corpus Christi’s workforce. By setting realistic goals, based on expected vacancies and anticipated availability of skills within the relevant labor area, and using a job-related selection system, Texas A&M University - Corpus Christi should be able to meet the goals, assuming we conduct effective recruitment and advertising efforts to ensure an adequate pool of qualified minority and/or female qualified applicants from which to make selections.

In establishing goals, Texas A&M University - Corpus Christi considered the results that could reasonably be expected from putting forth good faith efforts to make our overall AAP work. Goals were not established that would exclude any gender or race/ethnic group.

See Exhibit 3 for a copy of the Goals report for each job group.
CHAPTER 7: DESIGNATION OF RESPONSIBILITY

As part of its efforts to ensure equal employment opportunity to all individuals, Texas A&M University - Corpus Christi has designated specific responsibilities to various staff to ensure the AAP focuses on all components of the employment system. To that end, the President, the Director, Employee Development & Compliance Services and those employed as supervisors and managers have undertaken the responsibilities described below.

President

The primary responsibility and accountability for implementing the AAP rests with the President. President, Dr. Flavius Killebrew, is responsible, through the Director, Employee Development and Compliance Services, for adherence to Texas A&M University - Corpus Christi’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 Texas A&M University - Corpus Christi’s AAP. Ensure that these personnel are identified in writing by name and job title. See Exhibit 4 for a copy of President’s Annual Reaffirmation of Commitment to Equal Opportunity, Affirmative Action, and Diversity Letter.

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 insures total involvement and commitment to equal employment opportunity programs through Texas A&M University - Corpus Christi’s AAP.

Director, Employee Development & Compliance Services:

The former Director, Employee Relations & Equal Opportunity position was expanded to the Director, Employee Development & Compliance Services in January 2013. The Director, Employee Development & Compliance Services is responsible for overall supervision of the AAP and for ensuring the guidance of the President’s Cabinet are implemented. The Director, Employee Development & Compliance Services ensures, through the Vice Presidents, Administrators, Deans, Managers and Supervisors, that all relevant policies and procedures are adhered to. Successful implementation of this program is a basis for evaluating the Director's effective work performance. The Director’s responsibilities include, but are not limited to, the following:

1. Ensure that Texas A&M University - Corpus Christi adheres to the stated policy of equal employment opportunity, and monitor the application of equal employment opportunity policies.
2. Ensure that the AAP is reviewed and updated annually in accordance with Federal, State, and TAMUS regulations and policies.

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. Review and monitor all hiring actions to ensure equal opportunity and hiring decisions are based on sound and fair employment practices.

5. Review the qualifications of all employees to ensure equitable opportunity, based on job-related employment practices, is given to all for transfers and promotions.

6. 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.

7. Ensure that all new employees receive orientation to Texas A&M University - Corpus Christi equal employment opportunity policy and are thoroughly informed with regard to the AAP and its objectives.

8. Periodically analyze applicant flow to determine the mix of persons applying for employment by race/ethnic origin and gender.

9. Ensure that recruitment advertising is placed in minority and female-oriented publications, as applicable.

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.

11. Provide direction to Texas A&M University - Corpus Christi's employees, as necessary, to carry out all actions required to meet the University's equal employment opportunity and affirmative action commitments.

12. Develop, implement, and maintain audit and reporting systems for faculty and staff employment 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.

13. Advise management in the modification and development of Texas A&M University - Corpus Christi's policies to ensure the enhancement of equal employment opportunity for all employees and potential employees within existing equal employment opportunity guidelines.
14. Conduct periodic audits to ensure all required posters and those advertising Texas A&M University - Corpus Christi’s equal employment opportunity policies and AAP are displayed and that Texas A&M University - Corpus Christi’s equal employment opportunity and AAP policies are being thoroughly communicated.

15. 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.

16. Ensure that the following must appear in BOLD TEXT in all system member covered Government contracts or subcontracts (and modifications, renewals, or extensions thereof if not included in the original contract):

i. "This contractor and subcontractor shall abide by the requirements of 41 CFR §§ 60-1.4(a), 60-300.5(a) and 60-741.5(a). These regulations prohibit discrimination against qualified individuals based on their status as protected veterans or individuals with disabilities, and prohibit discrimination against all individuals based on their race, color, religion, sex, or national origin. Moreover, these regulations require that covered prime contractors and subcontractors take affirmative action to employ and advance in employment individuals without regard to race, color, religion, sex, national origin, protected veteran status or disability."

Administrators, Deans, Managers and Supervisors

In their direct day-to-day contact with Texas A&M University - Corpus Christi’s employees, Administrators, Deans, Managers and Supervisors have assumed certain responsibilities to help the University ensure compliance with equal employment opportunity programs and effective implementation of the AAP. These include, but are not limited to, the following:

1. Support and promote Texas A&M University - Corpus Christi’s equal employment opportunity and affirmative action policy.

a. Support and assist the Director, Employee Development & Compliance Services in developing, maintaining, and successfully implementing the AAP.

b. Take action to prevent harassment of employees, to prevent any retaliation against employees who avail themselves of their respective complaint and appeal procedures, and prevent retaliation against employees who file a complaint with a federal, state, or local compliance agency.

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 Texas A&M University - Corpus Christi’s policy.
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 8: IDENTIFICATION OF PROBLEM AREAS
41 C.F.R. § 60-2.17(b)

Terminology

The phrases “comparison of incumbency to availability,” and “problem area” appearing in this chapter are terms Texas A&M University – Corpus Christi is required by government regulations to use. The criteria used in relation to these terms are those specified by the government. These terms have no independent legal or factual significance. Although Texas A&M University – Corpus Christi will use the terms in good faith in connection with its AAP, such use does not necessarily signify the University agrees that these terms are properly applied to any particular factual situation and is not an admission of non-compliance with EEO laws, regulations, and objectives. Whenever the term “goal” is used, it is expressly intended that it “should not be used to discriminate against any applicant or employee because of race, color, religion, gender, or national origin,” as stated in Title 41 Code of Federal Regulations, Part 60-2.16(e).

Based on analyses of each job group, areas of concern have been identified and are discussed below. In addition to comparing incumbency to availability within job groups, Texas A&M University - Corpus Christi has conducted studies to identify problem areas in each of its selection procedures (i.e., hires, promotions, and terminations) as well as by organizational unit. Texas A&M University - Corpus Christi will continue to monitor and update these studies during each AAP year. 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 9 of this AAP.

Goals are established within each of the job groups at no less than the current availability data for the job group.

41 C.F.R. § 60-2.17(b)(1): Workforce by Organizational Unit and Job Group

An analysis of minority and female distribution within each organizational unit was accomplished by a thorough investigation of the Workforce analysis. See Exhibit 1 for a copy of the Workforce Analysis by organizational unit.

An analysis of minority and female utilization within each job group was accomplished by a thorough investigation of the Placement Goals reports. See Exhibit 2 for the Placement Goals reports for each job group.

41 C.F.R. § 60-2.17(b)(2): Personnel Activity

Applicant flow, hires, promotions, and terminations were analyzed by job group. An analysis of selection disparities in personnel activity between men/women and whites/minorities was accomplished by a thorough examination of transaction data. In order to avoid meaningless results, Impact Ratio Analyses were conducted only if there are at least 5+ transactions that occurred in a job group.
41 C.F.R. § 60-2.17(b)(3): Compensation Systems

Compensation analyses were conducted by comparing the mean salaries for men v. women, and whites v. minorities in each pay grade. Mean tenure within the organization was also considered as a moderating factor. See Exhibit 5 for a copy of the Compensation Analyses conducted for the workforce.
CHAPTER 9: ACTION-ORIENTED PROGRAMS
41 C.F.R. § 60-2.17(e)

Texas A&M University - Corpus Christi tailors our action-oriented programs each year to ensure they are specific to the problem identified. Corrective actions were taken only when the underrepresentation equaled at least one whole person.

Action-Oriented Program:

The Action-Oriented Programs designed to address the underutilization of women and minorities are listed below. These Action-Oriented Programs will be carried-out throughout the AAP year. The Director, Employee Development & Compliance Services, with the help of the managers, will be responsible in ensuring that the following are implemented.

Recruitment:

1. Texas A&M University - Corpus Christi will continue to place advertisements of job opportunities through the local Texas Workforce Commission (TWC) office. The TWC’s service office will be notified concurrent with the placement of a newspaper ad. The Provost and Vice President for Academic Affairs will also post faculty and senior level positions on http://www.higheredjobs.com and the Chronicle of Higher Education at no charge to the hiring departments.

2. Due to the extensive technical education and experience required for some positions, Texas A&M University - Corpus Christi will also continue to place job opportunity announcements in the University website, https://islanderjobs.tamucc.edu/.

   a. And in national sources when appropriate. Employees or applicants may review and/or apply for any openings. Human Resources staff who regularly assist applicants are bilingual and are available to assist Spanish speaking applicants on-site or by phone.

3. Texas A&M University - Corpus Christi will continue to place an ad on our University website https://islanderjobs.tamucc.edu and sending email to all departments for internal postings.

4. Advertisements and newsletters will always carry the Equal Employment Opportunity clause, “Texas A&M University-Corpus Christi is an Equal Opportunity/Affirmative Action/Veterans/Disability Employer.” In paid advertisements this may be shortened to: “EO/AA /Vet/Disabled Employer”

5. Minority and female applicants will be considered for all positions for which they are qualified. The HR staff participates in university sponsored diversity workshops and programs.

6. Online and on-site training programs are available for hiring managers, on subjects including how to conducting effective interviews.

7. Texas A&M University - Corpus Christi will continue to recruit by email to several colleges
and universities, and placing advertisements with Hispanic Serving Institutions, Historically Black Colleges and Universities, the Chronicle of Higher Education, professional discipline-specific journals, and the Texas Workforce Commission, etc.

8. The University will continue to employ work-study students who work during the summer and part-time during the school year. Many of these students are referred by the Financial Aid Office and Career Services Office.

9. Texas A&M University - Corpus Christi will continue to publish recruiting brochures where minority and female members of the workforce are included, as well as in other University literature, and websites.

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, religion, national origin, disability or veteran status.

3. Approved position specifications and worker specifications will be made available to all members of management involved in the recruiting, screening, selection, and promotion process. Copies may also be made available to recruiting sources.

4. Texas A&M University - Corpus Christi will continue to use only worker specifications that include job-related criteria.

5. Texas A&M University - Corpus Christi 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. Texas A&M University - Corpus Christi will continue to post or announce job opportunities. TAMUS Job Posting Policy requires postings of all positions up to the Senior Management level, except in the case of internal promotions and TAMUS only postings.

2. Texas A&M University - Corpus Christi 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.

3. Require supervisory personnel to submit justification when apparently qualified minority or female employees are passed over for upgrading.

4. All employees are actively encouraged to participate in facilities and University -sponsored
social and recreational activities.

5. Texas A&M University - Corpus Christi will continue to use our formal employee evaluation program. The performance appraisal is used for annual reviews for all employees.

6. Employees can choose online training courses through the HR Connect and include them in their career development plan.

https://sso.tamus.edu

7. Tuition Assistance Scholarship is offered to all full time budgeted employees who have completed an initial 3-month employment period who are interested in pursuing an undergraduate degree or an advance degree, with certain limitations.
CHAPTER 10: 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, Employee Development & Compliance Services, 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 Texas A&M University - Corpus Christi auditing and reporting system periodically measures the effectiveness of its total affirmative action program. The Director, Employee Development & Compliance Services:

1. Monitors 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. Requires internal reporting on a scheduled basis as to the degree to which equal employment opportunity and organizational objectives are attained;

3. Reviews report results with all levels of management; and

4. Advises top management of program effectiveness and submit recommendations to improve unsatisfactory performance.
PART II: AFFIRMATIVE ACTION PLAN FOR DISABLED VETERANS, OTHER VETERANS, AND PERSONS WITH DISABILITIES

FOR

January 1, 2013 through December 31, 2013
PART II

AAP FOR DISABLED VETERANS, OTHER VETERANS, AND PERSON WITH DISABILITIES

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

It is the policy of Texas A&M University System (TAMUS) that equal employment opportunity is provided in the employment and advancement of covered veterans and individuals with a disability at all levels of employment, including the executive level. Covered veterans are disabled veterans, recently separated veterans, other protected veterans, and armed forces service medal veterans. As a member of the TAMUS, Texas A&M University - Corpus Christi does not and will not discriminate against any applicant or employee because he or she is a covered veteran or because of a physical or mental disability in regard to any position for which the applicant or employee is qualified. In addition, Texas A&M University - Corpus Christi is committed to a policy of taking affirmative action to recruit, hire, train and promote all qualified covered veterans and individuals with a disability. Such affirmative action applies to all employment practices, including but not limited to, hiring, promotion, 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 are made on the basis of an individual's capacity to perform a particular job and the reasonableness of any necessary job accommodation. Texas A&M University - Corpus Christi will make every effort to provide reasonable accommodations to any physical and mental limitations of individuals with a disability and to disabled veterans.

Our obligations in this area stem not only from adherence to TAMUS, state and federal regulations, but also from our commitment to the community to provide job opportunities to covered veterans and individuals with a disability.

Any questions regarding our equal employment opportunity policies or complaint procedures, should be directed to Mr. Samuel Ramirez, Director, ED&CS at 361-825-5826 or samuel.ramirez@tamucc.edu.

Flavius C. Killebrew
President/CEO
To ensure that all personnel activities are conducted in a job-related manner that provides and promotes equal employment opportunity for all known covered veterans and individuals with a disability (employees and applicants), reviews of the University’s selection methods to identify barriers to employment, training, and promotion are made periodically. We will ensure that our personnel processes do not stereotype disabled individuals, recently separated veterans, other protected veterans, and Armed Forces service medal veterans in a manner that limits their access to all jobs for which they are qualified.

Review of Policies, Practices, and Procedures

1. Selection procedures for employment, promotion, and training are reviewed to ensure careful, thorough, and systematic consideration of the qualifications of known individuals with a disability and covered veterans.

2. The following actions are being taken to ensure systematic consideration of known individuals with a disability and covered veterans:
   a. In each case where a covered employee or applicant is rejected for employment, promotion, or training, a statement of reason is maintained; and
   b. When covered applicants or employees are selected for hire, promotion, or training and any resulting accommodation is undertaken, the accommodation is properly documented.
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 known individuals with a disability and covered veterans, reviews are periodically made of the organization's physical and mental qualifications and requirements as they relate to employment, training, and promotion.

Proper Consideration of Qualifications

1. Physical and mental job qualification requirements contained in position descriptions are periodically reviewed to ensure all physical and mental job qualification standards to ensure that, to the extent qualification standards tend to screen out qualified individuals with disabilities, they are job-related for the position in question and are consistent with business necessity and safety.

2. The burden of proof to demonstrate the necessity of any qualification requirement that may disqualify a covered veteran or an individual with a disability rests with Texas A&M University - Corpus Christi.
CHAPTER D: REASONABLE ACCOMMODATIONS FOR PHYSICAL AND MENTAL IMPAIRMENTS
41 C.F.R §§ 60-300.44(d); 60-741.44(d)

Accommodations for Individuals with a Disability

All reasonable efforts will be made to accommodate the physical or mental impairments of known individuals with a disability and covered veterans unless it can be demonstrated that such an accommodation would impose an undue hardship on conducting Texas A&M University - Corpus Christi operations. In determining the extent of obligation to provide such accommodation, factors such as financial cost and organizational necessity will be considered.

If an employee with a known disability or a known covered veteran 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, Texas A&M University - Corpus Christi shall confidentially notify the employee of the performance problem and inquire whether the problem is related to the employee's disability; if the employee responds affirmatively, Texas A&M University - Corpus Christi shall confidentially inquire whether the employee is in need of a reasonable accommodation.

Employees may also contact the following at any time to formally request an accommodation:

Name: Samuel Ramirez, SPHR, Sr. CAAP
Title: Director, Employee Development & Compliance Services (ED&CS)
361-825-5826
Samuel.Ramirez@tamucc.edu
CHAPTER E: HARASSMENT
41 C.F.R. §§ 60-300.44(e); 60-741.44(e)

Texas A&M University - Corpus Christi has developed and implemented a set of procedures to ensure that its employees who have a disability or are covered veterans are not harassed due to those conditions. All new employees are required to complete online nondiscrimination training ("Creating a discrimination free workplace") as part of the onboarding process, and to maintain currency through biannual training requirements.
CHAPTER F: OUTREACH, POSITIVE RECRUITMENT, AND EXTERNAL POLICY DISSEMINATION
41 C.F.R. §§ 60-300.44(f); 60-741.44(f)

Based upon the university’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.

1. Each advertisement for a vacant position will continue to affirm our commitment to affirmative action by including an appropriate phrase at the end of the communication “Texas A&M University - Corpus Christi is an Equal Opportunity/Affirmative Action/Veterans/Disability Employer.” In paid advertisements this may be shortened to: “EO/AA/Vet/Disabled Employer”.

2. The Texas A&M University - Corpus Christi statement on equal opportunity and affirmative action is communicated in all recruitment efforts to all prospective employees through its inclusion on job postings and the official application for employment.

3. Texas A&M University - Corpus Christi positions will continue to be listed with and communicated to appropriate organizations, agencies, and local public and private educational institutions having special interests in alignment with our policies and goals, including working with our campus Disability Services and Veteran’s Affairs Offices, and our Student Veteran Organization.

4. Texas A&M University - Corpus Christi will promote veterans and disabled individuals in consumer, promotional and recruitment, marketing and advertising.

5. Send written notification of the University’s affirmative action policy to all subcontractors, vendors, and suppliers requesting appropriate action on their part.
CHAPTER G: INTERNAL POLICY DISSEMINATION
41 C.F.R. §§ 60-300.44(g); 60-741.44(g)

In order to gain positive support and understanding for the affirmative action program for disabled individuals and covered veterans, Texas A&M University - Corpus Christi will execute and/or continue to implement the following internal dissemination procedures. The following policies and procedures are designed to foster support and understanding from Texas A&M University - Corpus Christi’s executive staff, management, supervisor’s, and other employees in an effort to encourage all employees to take the necessary actions to aid Texas A&M University - Corpus Christi in meeting its obligations.

1. Annual Memorandum: Each year the President will send a memorandum reaffirming the AA/EEO Policy Statement to all employees.

2. Affirmative Action Program: The University’s affirmative action program will continue to be revised annually by the Affirmative Action Officer. Periodic updates will be provided to management as appropriate. The Equal Employment Opportunity Policy and federally required EEO posters affirming our nondiscrimination policy are posted on bulletin boards in public locations. Copies will also be posted in the Spanish language.

3. Schedule training sessions for all employees involved in recruiting, selection, promotion, and other related employment issues for disabled veterans, other veterans, and individuals with disabilities.

4. Include articles and visual marketing materials that include covered veterans and disabled employees in University publications and on our website.

5. Post the discrimination and harassment policies and rules on the University website and bulletin boards.

6. Discuss the policy thoroughly in both employee orientation and management training programs. The University informs management employees about the University’s EEO/AA programs through University-sponsored training seminars, which include supervisory skills and the hiring process. Online orientation and training is available on the TAMU-CC website: http://tder.tamucc.edu/Professional%20Development%20Information.html.
CHAPTER H: AUDIT AND REPORTING SYSTEM
41 C.F.R. §§ 60-300.44(h); 60-741.44(h)

Texas A&M University - Corpus Christi will execute and/or continue to implement an audit and reporting system that addresses the following:

1. Measures the effectiveness of the overall Affirmative Action Plan and whether the university is in compliance with specific obligations.
2. Indicates the need for remedial action.
3. Measures the degree to which objectives are being met.
4. Identifies hurdles for disabled individuals and covered veterans and how to correct them.
5. Where deficiencies are found, corrective action will be taken to bring our AAP into compliance.
CHAPTER I: RESPONSIBILITY FOR IMPLEMENTATION
41 C.F.R. §§ 60-300.44(i); 60-741.44(i)

The President and Chief Executive Officer of Texas A&M University - Corpus Christi has ultimate responsibility for the commitment to and success of the Affirmative Action Program for covered veterans and individuals with a disability. The President and Chief Executive Officer has delegated specific authority and overall supervision for the Affirmative Action Plan to the Director of the Employee Development & Compliance Services Department.

Director, Employee Development & Compliance Services

The Director will work with the Department Administrators, Deans, Managers and Supervisors, to ensure all relevant policies and procedures are observed and followed.

The Director’s responsibilities include, but are not limited to, the following:
1. Presenting all needed recommendations and procedural changes to Vice Presidents concerning EEO and affirmative action and ensuring that Administrators, Deans, Managers and Supervisors are kept informed of the compliance status.
2. Maintaining University-wide management support and cooperation for the AAP.
4. Assisting line management in arriving at solutions to EEO/AA problems.
5. Reviewing results of audit and reporting systems to assess the effectiveness of the AAP program and to direct corrective action where necessary.
6. Ensuring that the AAP is updated annually for all establishments.
7. Providing guidance to Administrators, Deans, 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.
8. Ensuring that relevant employees, (i.e., Director ED&CS, managers, and supervisors) are aware that performance is being reviewed and evaluated regarding equal employment opportunity efforts and results.
9. Ensuring the review of qualifications of all applicants and employees to ensure equitable opportunity, based on job-related employment practices; and ensuring review of qualification to ensure equitable opportunity for all transfers and promotions.
10. Conducting periodic assessments of: 1) training programs and hiring and promotion patterns to remove impediments to the attainment of AAP goals and objectives; and 2) 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 covered veterans and employees with disabilities have had the opportunity to participate in all University-sponsored educational, training, recreation and social activities.
11. Reviewing all job descriptions and specifications to ensure they are free of discriminatory provisions and artificial barriers. Ensuring that all requirements are job-related and realistic, and they reflect the actual requirements of the essential job duties.
12. Ensuring the VETS-100 form is filed annually with the Secretary of Labor.
13. Providing direction to the all employees, as necessary, to carry out all actions required to meet the equal employment opportunity and affirmative action commitments.
14. Designing and effectively implementing the AAP.
15. Developing, implementing, and maintaining assessment and reporting systems to measure effectiveness of equal employment opportunity programs, including those that will:
   a. Indicate need for remedial action, and
   b. Determine degree to which goals and objectives have been obtained.
16. Advising management in the modification and development of the University's policies to ensure the enhancement of equal employment opportunity for all employees and potential employees within existing equal employment opportunity guidelines.
17. Identifying AAP problem areas and establishing procedures, goals and objectives for future use.
18. Ensuring all required posters and those advertising the University's equal employment opportunity policies and AAP, as well as the Invitation to Self-Identify for disabled individuals and covered veterans are displayed and that the equal employment opportunity and AAP policies are being thoroughly communicated.
19. Developing policy statements, affirmative action programs, internal and external communication techniques.
20. Assisting employees in arriving at solutions for issues addressed in the AAP and future prevention.
21. Serving as the primary liaison between Texas A&M University-Corpus Christi and various System enforcement agencies.
22. Serving as the primary liaison between Texas A&M University-Corpus Christi and organizations, agencies and community action groups for individuals with disabilities, and covered veterans, in addition to ensuring that representatives are involved in community service programs of local organizations for covered veterans and persons with disabilities.
23. Keeping management informed of the developments in the equal employment opportunity area.
24. Reviewing, reporting, and updating the AAP annually in accordance with stated policy. Informing employees and applicants of changes.
25. Working closely with the Administrators, Deans, Managers and Supervisors in coordinating the effective implementation of all identified affirmative actions.
26. 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.
27. Ensure that the following must appear in BOLD TEXT in all system member covered Government contracts or subcontracts (and modifications, renewals, or extensions thereof if not included in the original contract):

"This contractor and subcontractor shall abide by the requirements of 41 CFR §§ 60-1.4(a), 60-300.5(a) and 60-741.5(a). These regulations prohibit discrimination against qualified individuals based on their status as protected veterans or individuals with disabilities, and prohibit discrimination against all individuals based on their race, color, religion, sex, or national origin. Moreover, these regulations require that covered prime contractors and subcontractors take affirmative action to employ and advance in employment individuals without regard to race, color, religion, sex, national origin, protected veteran status or disability."

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29. Responsible for ensuring the University's compliance with the AAP.

Administrators, Deans, Managers and Supervisors

In day-to-day contact with the Texas A&M University – Corpus Christi's employees, applicants and visitors, the Administrators, Deans, Managers and Supervisors have assumed certain responsibilities to help 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 University's equal employment opportunity policy.
2. Supporting and assisting the Director of ED&CS 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 applicants and employees through affirmative action efforts.
5. Assigning employees to significant jobs and training 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 policy.
7. Implementing the internal promotion and transfer of all employees consistent with AAP goals and objectives.
8. Assisting in identifying problem areas and providing needed information for establishing and meeting affirmative action goals and objectives.
9. Seeking and sharing information on feasible accommodations that have been or could be made for known covered veterans and individuals with disabilities.
CHAPTER J: TRAINING
41 C.F.R. §§ 60-300.44(j); 60-741.44(j)

All Texas A&M University -- Corpus Christi employees involved in the recruitment, screening, selection, promotion, discipline, training, and related processes shall be trained to ensure the commitment in the AAP program are implemented. New employees will receive training & information during their orientation programs. Additionally, each new employee will complete the TrainTraq online module entitled, “Creating a discrimination free workplace.” Afterwards, employees will complete refresher training every two years in accordance with TAMUS regulations.
CHAPTER K: COMPENSATION
41 C.F.R. §§ 60-300.21(i); 60-741.21(i)

It is the policy of Texas A&M University – Corpus Christi that when offering employment or promotion to covered veterans or individuals with a disability, the amount of compensation offered will not be reduced because of any disability income, pension, or other benefit the applicant or employee receives from any another source.