

Oklahoma Panhandle State University
AFFIRMATIVE ACTION PROGRAM

July 1, 2010 through June 30, 2011

Prepared in accordance with 41 CFR Chapter 60 - 2

Cheryl Ashpaugh
EEO Officer

Dr. David A. Bryant
President



Prepared By RPL Management Resources, Inc.

Oklahoma Panhandle State University

President:	Dr. David A. Bryant
EEO Officer:	Cheryl Ashpaugh
Address:	P.O. Box 430 Goodwell, OK 73939
Telephone Number:	580-349-2611
EI#	73-6017987
EEO#	
D&B#	
Number of Employees:	146
Number of Departments:	2

This Affirmative Action Program contains confidential, commercial, trade secret information and is protected from disclosure by government agencies pursuant to the Trade Secrets Act (18 U.S.C. 1905). Exemptions 3, 4 and 6 of the Freedom of Information Act also protect this information from mandatory disclosure. (Cf. Chrysler v. Brown, 441 U.S. 281 - 1979; & National Parks and Conservation Assn. v. Morton, 498 F.2d 765 (D.C. Cir. 1974))

INTRODUCTION

Oklahoma Panhandle State University has developed an Affirmative Action Program meeting all requirements of Executive Order 11246, 41 CFR 60-1 and 2 (Affirmative Action Programs), 60-20 (Sex Discrimination Guidelines), and 60-50 (Guidelines on Discrimination Because of Religion or National Origin), 60-250 (Vietnam Era Veterans Readjustment Assistance Act of 1974), and 60-741 (Rehabilitation Act of 1973).

Oklahoma Panhandle State University is required to act affirmatively in all employment actions and to prepare an Affirmative Action Program that will be administered without regard to race, color, religion, sex, age, national origin, veteran or handicap status. Overall administration and monitoring of the program has been delegated to Cheryl Ashpaugh, EEO Officer.

The Affirmative Action Program describes the policies, practices and procedures implemented by Oklahoma Panhandle State University to employ and advance in employment, at all levels of management and non-management, qualified individuals without regard to race, color, religion, sex, age, national origin, veteran or handicap status.

EQUAL EMPLOYMENT OPPORTUNITY POLICY STATEMENT

It is my position, as well as that of all company management, that the success of Oklahoma Panhandle State University is largely dependent on the support and contribution of its employees. We consider them to be its most valuable resource. Because of this belief, I affirm personally and in behalf of our organization, Oklahoma Panhandle State University's commitment to the equitable treatment of all employees and applicants for employment without regard to race, color, sex, religion, age, national origin, Vietnam era veteran, disabled veteran or disabled status. This policy applies to all personnel actions and includes, but is not limited to, recruitment, hiring, classification, benefits, compensation, promotion, transfer, layoff and return from layoff, termination, training and education assistance, social and recreational programs.

To ensure Oklahoma Panhandle State University's policies, procedures and practices are effectively implemented, we have designated Cheryl Ashpaugh, our Equal Employment Opportunity Officer. The EEO Officer will be responsible for implementing and directing our affirmative action plan (AAP) and its internal and external reporting requirements. Our AAP is available for review by employees and applicants for employment. It can be reviewed at the Human Resources Dept. on workdays between 9:00 a.m. and 3:00 p.m.

Dr. David A. Bryant
President

RESPONSIBILITIES FOR IMPLEMENTATION 41 CFR 60-2.17(a)

A. Responsibilities of the EEO Officer:

Cheryl Ashpaugh is the EEO Officer of Oklahoma Panhandle State University. The support of top management and staff will be given to the Equal Employment Opportunity Officer to execute responsibilities effectively. The responsibilities include, but are not limited to:

1. Developing policy statements, affirmative action programs and internal communication techniques.
2. Assisting in the identification of problem areas.
3. Assisting line management in arriving at solutions to problems.
4. Designing and implementing audit and reporting systems that will:
 - a) Measure effectiveness of programs.
 - b) Indicate need for remedial action.
 - c) Determine the degree to which goals and objectives have been attained.
5. Serving as liaison between the organization and enforcement agencies.
6. Serving as liaison between the company and minority organizations, women's organizations, and community action groups concerned with employment opportunities of minorities and women.
7. Keeping management informed of the latest developments in the entire equal opportunity area to the best of our knowledge.

B. Line management's responsibilities include, but are not limited to:

1. Assisting in the identification of problem areas and the establishment of local unit goals and objectives.
2. Being actively involved with local minority organizations, women's organizations, community action groups, and community service programs.
3. Periodically auditing training programs, hiring and promotion patterns to remove impediments to the attainment of goals and objectives.
4. Having regular discussions with local managers, supervisors and employees to be certain the company's policies are being followed.
5. Reviewing the qualifications of all employees to ensure that minorities and women are given full opportunities for transfers and promotions.
6. Career counseling for all employees.
7. Periodically auditing each location to ensure that they are in compliance in areas such as:
 - a) Posters are properly displayed.
 - b) All facilities, including company housing, which the contractor maintains for the use and benefit of our employees, are in fact desegregated, both in policy and in use.
 - c) Minority and female employees are afforded full opportunity and are encouraged to participate in all Oklahoma Panhandle State University sponsored educational, training, recreational and social activities.
8. Understanding that their work performance is being evaluated on the basis of their equal employment opportunity efforts and results, as well as other criteria.
9. Taking action to prevent harassment of those employees placed through affirmative action efforts.

C. Employee's responsibilities include, but are not limited to:

1. Assisting in the identification of problem areas and the establishment of local unit goals and objectives.
2. Being actively involved with local minority organizations, women's organizations, community action groups, and community service programs.
3. Taking action to prevent harassment of those employees placed through affirmative action efforts.
4. Taking responsibility for personal behavior in interacting with other employees, being especially aware of the problems of harassment, discrimination, and other difficulties faced by females and minorities in the work place.

WORK FORCE ANALYSIS

Work Force Analysis 41 CFR 60-2.11

This chapter contains the Work Force Analysis. Each department in the company is included and all job titles are listed as required by the regulations from the highest to the lowest paid jobs. The format used in presenting this information is designed to demonstrate the work force participation as clearly as possible. The format displays the job title, the job group to which the job belongs, salary range, IPEDS Code, male and female participation in the job title and total of all employees working in that job title. Additionally, the form identifies the race and sex of incumbents with totals for each job title. This analysis becomes the base data source for several additional analyses found in subsequent chapters.

WORKFORCE ANALYSIS

2010 AAP YEAR

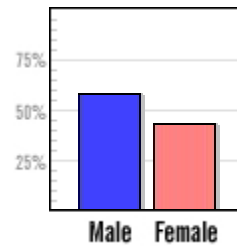
Company Name: Oklahoma Panhandle State University	B - Black AI - American Indian A - Asian H - Hispanic or Latino PI - Native Hawaiian / Pacific Islander +2 - Two or more races
Department:	
Date: July 1, 2010	

% Participation

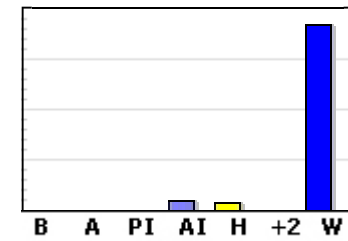
Female	
42.86%	
Black	0%
Asian	0%
PI / H	0%
Am In	3.17%
Hispanic	0%
+2	0%
Male	57.14%

Minority	
7.94%	
Black	0%
Asian	0%
PI / H	0%
Am In	4.76%
Hispanic	3.17%
+2	0%
White	92.06%

Female Participation



Minority Participation



WORKFORCE ANALYSIS

2010 AAP YEAR

Company Name: Oklahoma Panhandle State University					B - Black AI - American Indian																			
Department: Staff - continued					A - Asian H - Hispanic or Latino																			
Date: July 1, 2010					PI - Native Hawaiian / Pacific Islander																			
					+2 - Two or more races																			
Job Group	Job Title	WAGE / SALARY		IPEDS	EMPLOYEES			MINORITIES																
		Min	Max		Male	Female	Total	Male					Female					Total						
								B	A	PI	AI	H	+2	B	A	PI	AI		H	+2				
5	Webmaster		\$45,000.00	5	1	0	1																	0
1D	Farm Manager		\$42,560.00	1	1	0	1																	0
1C	Director of Human Resources		\$41,000.00	1	0	1	1																	0
1C	Director of Financial Aid		\$40,090.00	1	0	1	1																	0
4A	Insurance Coordinator/Payroll Assistant		\$39,000.00	4	0	1	1																	0
7	Security Officer / Apartment Mgr		\$38,488.00	7	1	0	1																	0
3B	Assistant Football Coach	\$32,000.00	\$37,747.00	3	2	0	2																	0
1C	Director of Assesemnt & Academic Research		\$37,044.00	1	0	1	1																	0
2C	Instructor		\$37,000.00	2	1	0	1						1											1
1C	Director of Student Services/Enrollment Mgmt		\$36,828.00	1	0	1	1																	0
2C	Instructor/tutor/office Manager		\$36,000.00	2	1	0	1																	0
7	Groundskeeper Lead Man		\$36,000.00	7	1	0	1																	0
7	Groundskeeper/Maintenance Repairman		\$35,000.00	7	1	0	1																	0
4A	Administrative Assistant / Secretary	\$29,000.00	\$34,728.00	4	0	3	3															1		1
1C	Director of Counseling, Testing, Guidance		\$34,034.00	1	0	1	1																	0
4A	Head Cashier		\$33,253.00	4	0	1	1																	0

WORKFORCE ANALYSIS

2010 AAP YEAR

Company Name: Oklahoma Panhandle State University							B - Black AI - American Indian																	
Department: Staff - continued							A - Asian H - Hispanic or Latino																	
Date: July 1, 2010							PI - Native Hawaiian / Pacific Islander																	
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Job Group	Job Title	WAGE / SALARY		IPEDS	EMPLOYEES			MINORITIES																
		Min	Max		Male	Female	Total	Male						Female					Total					
								B	A	PI	AI	H	+2	B	A	PI	AI	H		+2				
1D	Bookstore Manager		\$33,193.00	1	0	1	1																	0
3B	Assistant To The Registrar		\$32,827.00	3	0	1	1																	0
4A	Admissions Counselor		\$32,673.00	4	0	1	1																	0
1D	Assistant Farm Manager		\$31,500.00	1	1	0	1																	0
6	Carpenter		\$31,091.00	6	1	0	1						1											1
6	Painter		\$30,912.00	6	1	0	1																	0
3B	Asst Director Itv		\$30,405.00	3	1	0	1																	0
3B	Assistant Meat Lab Director		\$30,000.00	3	1	0	1																	0
4A	Admin Asst / Housing Mgr		\$29,579.00	4	0	1	1																	0
3B	Recruiter	\$25,000.00	\$28,562.00	3	0	2	2																	0
4A	Financial Aid Counselor	\$22,050.00	\$27,562.00	4	0	2	2															1		1
3B	Staff Nurse		\$27,424.00	3	0	1	1																	0
1C	Field Placement Director		\$26,460.00	1	0	1	1																	0
4A	Records Specialist		\$25,250.00	4	0	1	1																	0
3B	Assistant Athletic Trainer		\$25,000.00	3	1	0	1	1																1
4A	International Coordinator		\$25,000.00	4	0	1	1															1		1
3B	Computer Technician		\$24,949.00	3	1	0	1																	0
4B	Secretary	\$5,319.00	\$21,997.00	4	0	6	6															1		1
7	Groundskeeper		\$21,638.00	7	1	0	1																	0
7	Maintenance Repairman		\$21,176.00	7	1	0	1																	0
5	Glf Course Superintendent		\$21,000.00	5	1	0	1																	0

WORKFORCE ANALYSIS

2010 AAP YEAR

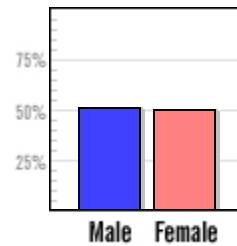
Company Name: Oklahoma Panhandle State University	B - Black AI - American Indian A - Asian H - Hispanic or Latino PI - Native Hawaiian / Pacific Islander +2 - Two or more races
Department:	
Date: July 1, 2010	

% Participation

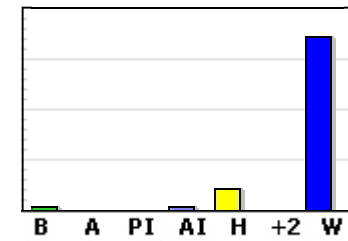
Female	
49.4%	
Black	0%
Asian	0%
PI / H	0%
Am In	1.2%
Hispanic	7.23%
+2	0%
Male	50.6%

Minority	
13.25%	
Black	1.2%
Asian	0%
PI / H	0%
Am In	1.2%
Hispanic	10.84%
+2	0%
White	86.75%

Female Participation



Minority Participation



JOB GROUP ANALYSIS

Job Groups Analysis 41 CFR 60-2.12

The selection criteria used to determine the placement of job titles into specific job groups were made on the basis of jobs having similar content, wage rates and opportunities as required by 41 CFR 60-2.12. With reference to "Job Content", the determining characteristics were similar levels of skills and responsibilities known to characterize the jobs under consideration.

The similar wage rates criterion was applied to both salaried and wage grade jobs. Similar opportunities were understood to mean opportunities for growth and advancement available to employees in specific jobs.

We were able to establish job groups without crossing IPEDS categories. They are grouped with appropriate weight given to the characteristics of similar content, wage rates and opportunities. However, given the relatively small numbers of employees in some job groups, it was necessary to give attention to having enough people in a job group to establish goals when appropriate.

Responding to the intent of the regulations, the job groups and specific job titles assigned to them are listed as follows:

**AVAILABILITY & UTILIZATION DETERMINATION 41 CFR 60-2.14
COMPARING INCUMBENCY TO AVAILABILITY 41 CFR 60-2.15
PLACEMENT GOALS 60-2.16**

DETERMINING AVAILABILITY

Our availability is an estimate of the number of qualified females and minorities available for employment in a given job group. This availability is expressed as a percentage of all qualified persons available for employment in a job group. The purpose is to establish a benchmark against which an employer can compare its incumbent workforce with the availability of females and minorities available for employment in our relevant labor market. We make this determination separately for each job group.

To arrive at this percentage we have considered at least the two following factors:

The percentage of females and minorities with requisite skills in our reasonable recruitment area. The reasonable recruitment area is that geographical area in which we usually seek or reasonably could seek workers to fill positions in our workforce. Our statistical data is taken from the U. S. Census Bureau and reflects our labor relevant labor market. In job groups having job titles with different availability figures, availability is determined separately and weighted separately for each job title and a composite availability is calculated.

The percentage of females and minorities in our workforce who are promotable, transferable and trainable to fill the vacancies in question. (Trainable are those employees in our workforce who, with appropriate training we can reasonably provide, could become promotable or transferable during this AAP year.)

COMPARING INCUMBENCY

When the availability of females and minorities has been determined for each job group, we compare this data against the percentages of female and minority incumbents in our workforce. When this comparison shows that there are fewer females or minorities in our workforce than availability indicates there should be, we set a goal in accordance with the directive at 41 CFR 60-2.15.

PLACEMENT GOALS

Placement goals serve as objectives or targets reasonably attainable by applying every good faith to make all aspects of our entire affirmative action program work. Our goals are used to measure our progress toward achieving equal employment opportunity. Several characteristics of our placement goals include:

- Our placement goals are set at availability for the specific job group.
- When substantial disparity of a specific female or minority group exists, we set separate goals for those job groups.
- Our placement goals are not quotas.
- In setting placement goals we do not extend preferences to any individual on the basis of that person's protected status, nor do we create set asides for specific groups. An exception to this principle is that we can give preference to American Indians living on or near an Indian reservation.
- Our use of goals does not supersede merit selection principles.

AVAILABILITY ANALYSIS

Company Name: Oklahoma Panhandle State University
Job Group: 1

FEMALE			
FACTORS	AVAILABILITY	% WEIGHT	WEIGHTED %
1. Availability of women having requisite skills in an area in which the contractor can reasonably recruit.	46.43%	100%	46.43%
2. Availability of promotable, transferable, and trainable female employees within the organization.	0%	0%	0%
FINAL AVAILABILITY			46.43%

MINORITY			
FACTORS	AVAILABILITY	% WEIGHT	WEIGHTED %
1. Availability of minorities having requisite skills in an area in which the contractor can reasonably recruit.	15.25%	100%	15.25%
2. Availability of promotable, transferable, and trainable minority employees within the organization.	0%	0%	0%
FINAL AVAILABILITY			15.25%

UTILIZATION AND GOALS ANALYSIS			
GROUP	% IN JG	UNDER Y/N	% GOALS
FEMALE	50%	No	0%
MINORITY	50%	No	0%
MALE	50%		
TOTAL	100%		

AVAILABILITY ANALYSIS

Company Name: Oklahoma Panhandle State University
Job Group: 1A

FEMALE			
FACTORS	AVAILABILITY	% WEIGHT	WEIGHTED %
1. Availability of women having requisite skills in an area in which the contractor can reasonably recruit.	29.7%	100%	29.7%
2. Availability of promotable, transferable, and trainable female employees within the organization.	0%	0%	0%
FINAL AVAILABILITY			29.7%

MINORITY			
FACTORS	AVAILABILITY	% WEIGHT	WEIGHTED %
1. Availability of minorities having requisite skills in an area in which the contractor can reasonably recruit.	20.8%	100%	20.8%
2. Availability of promotable, transferable, and trainable minority employees within the organization.	0%	0%	0%
FINAL AVAILABILITY			20.8%

UTILIZATION AND GOALS ANALYSIS			
GROUP	% IN JG	UNDER Y/N	% GOALS
FEMALE	0%	Yes	29.7%
MINORITY	0%	Yes	20.8%
MALE	100%		
TOTAL	100%		

AVAILABILITY ANALYSIS

Company Name: Oklahoma Panhandle State University
Job Group: 1B

FEMALE			
FACTORS	AVAILABILITY	% WEIGHT	WEIGHTED %
1. Availability of women having requisite skills in an area in which the contractor can reasonably recruit.	22.28%	80%	17.82%
2. Availability of promotable, transferable, and trainable female employees within the organization.	33%	20%	6.6%
FINAL AVAILABILITY			24.42%

MINORITY			
FACTORS	AVAILABILITY	% WEIGHT	WEIGHTED %
1. Availability of minorities having requisite skills in an area in which the contractor can reasonably recruit.	13.65%	80%	10.92%
2. Availability of promotable, transferable, and trainable minority employees within the organization.	0%	20%	0%
FINAL AVAILABILITY			10.92%

UTILIZATION AND GOALS ANALYSIS			
GROUP	% IN JG	UNDER Y/N	% GOALS
FEMALE	45.45%	No	0%
MINORITY	0%	Yes	10.92%
MALE	54.55%		
TOTAL	100%		

AVAILABILITY ANALYSIS

Company Name: Oklahoma Panhandle State University
Job Group: 1C

FEMALE			
FACTORS	AVAILABILITY	% WEIGHT	WEIGHTED %
1. Availability of women having requisite skills in an area in which the contractor can reasonably recruit.	46.43%	100%	46.43%
2. Availability of promotable, transferable, and trainable female employees within the organization.	0%	0%	0%
FINAL AVAILABILITY			46.43%

MINORITY			
FACTORS	AVAILABILITY	% WEIGHT	WEIGHTED %
1. Availability of minorities having requisite skills in an area in which the contractor can reasonably recruit.	18.04%	100%	18.04%
2. Availability of promotable, transferable, and trainable minority employees within the organization.	0%	0%	0%
FINAL AVAILABILITY			18.04%

UTILIZATION AND GOALS ANALYSIS			
GROUP	% IN JG	UNDER Y/N	% GOALS
FEMALE	80%	No	0%
MINORITY	10%	Yes	18.04%
MALE	20%		
TOTAL	100%		

AVAILABILITY ANALYSIS

Company Name: Oklahoma Panhandle State University
Job Group: 1D

FEMALE			
FACTORS	AVAILABILITY	% WEIGHT	WEIGHTED %
1. Availability of women having requisite skills in an area in which the contractor can reasonably recruit.	33.54%	80%	26.83%
2. Availability of promotable, transferable, and trainable female employees within the organization.	26%	20%	5.2%
FINAL AVAILABILITY			32.03%

MINORITY			
FACTORS	AVAILABILITY	% WEIGHT	WEIGHTED %
1. Availability of minorities having requisite skills in an area in which the contractor can reasonably recruit.	17.82%	80%	14.26%
2. Availability of promotable, transferable, and trainable minority employees within the organization.	0%	20%	0%
FINAL AVAILABILITY			14.26%

UTILIZATION AND GOALS ANALYSIS			
GROUP	% IN JG	UNDER Y/N	% GOALS
FEMALE	20%	Yes	32.03%
MINORITY	0%	Yes	14.26%
MALE	80%		
TOTAL	100%		

AVAILABILITY ANALYSIS

Company Name: Oklahoma Panhandle State University
Job Group: 2A

FEMALE			
FACTORS	AVAILABILITY	% WEIGHT	WEIGHTED %
1. Availability of women having requisite skills in an area in which the contractor can reasonably recruit.	45.13%	80%	36.1%
2. Availability of promotable, transferable, and trainable female employees within the organization.	30%	20%	6%
FINAL AVAILABILITY			42.1%

MINORITY			
FACTORS	AVAILABILITY	% WEIGHT	WEIGHTED %
1. Availability of minorities having requisite skills in an area in which the contractor can reasonably recruit.	16.98%	80%	13.58%
2. Availability of promotable, transferable, and trainable minority employees within the organization.	10%	20%	2%
FINAL AVAILABILITY			15.58%

UTILIZATION AND GOALS ANALYSIS			
GROUP	% IN JG	UNDER Y/N	% GOALS
FEMALE	41.67%	Yes	42.1%
MINORITY	0%	Yes	15.58%
MALE	58.33%		
TOTAL	100%		

AVAILABILITY ANALYSIS

Company Name: Oklahoma Panhandle State University
Job Group: 2B

FEMALE			
FACTORS	AVAILABILITY	% WEIGHT	WEIGHTED %
1. Availability of women having requisite skills in an area in which the contractor can reasonably recruit.	43.7%	80%	34.96%
2. Availability of promotable, transferable, and trainable female employees within the organization.	44%	20%	8.8%
FINAL AVAILABILITY			43.76%

MINORITY			
FACTORS	AVAILABILITY	% WEIGHT	WEIGHTED %
1. Availability of minorities having requisite skills in an area in which the contractor can reasonably recruit.	17.2%	80%	13.76%
2. Availability of promotable, transferable, and trainable minority employees within the organization.	12%	20%	2.4%
FINAL AVAILABILITY			16.16%

UTILIZATION AND GOALS ANALYSIS			
GROUP	% IN JG	UNDER Y/N	% GOALS
FEMALE	30%	Yes	43.76%
MINORITY	10%	Yes	16.16%
MALE	70%		
TOTAL	100%		

AVAILABILITY ANALYSIS

Company Name: Oklahoma Panhandle State University
Job Group: 2C

FEMALE			
FACTORS	AVAILABILITY	% WEIGHT	WEIGHTED %
1. Availability of women having requisite skills in an area in which the contractor can reasonably recruit.	43.7%	100%	43.7%
2. Availability of promotable, transferable, and trainable female employees within the organization.	0%	0%	0%
FINAL AVAILABILITY			43.7%

MINORITY			
FACTORS	AVAILABILITY	% WEIGHT	WEIGHTED %
1. Availability of minorities having requisite skills in an area in which the contractor can reasonably recruit.	17.2%	100%	17.2%
2. Availability of promotable, transferable, and trainable minority employees within the organization.	0%	0%	0%
FINAL AVAILABILITY			17.2%

UTILIZATION AND GOALS ANALYSIS			
GROUP	% IN JG	UNDER Y/N	% GOALS
FEMALE	44%	No	0%
MINORITY	12%	Yes	17.2%
MALE	56%		
TOTAL	100%		

AVAILABILITY ANALYSIS

Company Name: Oklahoma Panhandle State University
Job Group: 3A

FEMALE			
FACTORS	AVAILABILITY	% WEIGHT	WEIGHTED %
1. Availability of women having requisite skills in an area in which the contractor can reasonably recruit.	30.56%	80%	24.45%
2. Availability of promotable, transferable, and trainable female employees within the organization.	40%	20%	8%
FINAL AVAILABILITY			32.45%

MINORITY			
FACTORS	AVAILABILITY	% WEIGHT	WEIGHTED %
1. Availability of minorities having requisite skills in an area in which the contractor can reasonably recruit.	22.7%	80%	18.16%
2. Availability of promotable, transferable, and trainable minority employees within the organization.	13.4%	20%	2.68%
FINAL AVAILABILITY			20.84%

UTILIZATION AND GOALS ANALYSIS			
GROUP	% IN JG	UNDER Y/N	% GOALS
FEMALE	22.22%	Yes	32.45%
MINORITY	0%	Yes	20.84%
MALE	77.78%		
TOTAL	100%		



AVAILABILITY ANALYSIS

Company Name: Oklahoma Panhandle State University

Job Group: 3B

FEMALE			
FACTORS	AVAILABILITY	% WEIGHT	WEIGHTED %
1. Availability of women having requisite skills in an area in which the contractor can reasonably recruit.	38.76%	100%	38.76%
2. Availability of promotable, transferable, and trainable female employees within the organization.	0%	0%	0%
FINAL AVAILABILITY			38.76%

MINORITY			
FACTORS	AVAILABILITY	% WEIGHT	WEIGHTED %
1. Availability of minorities having requisite skills in an area in which the contractor can reasonably recruit.	20.45%	100%	20.45%
2. Availability of promotable, transferable, and trainable minority employees within the organization.	0%	0%	0%
FINAL AVAILABILITY			20.45%

UTILIZATION AND GOALS ANALYSIS			
GROUP	% IN JG	UNDER Y/N	% GOALS
FEMALE	37.5%	Yes 	38.76%
MINORITY	12.5%	Yes 	20.45%
MALE	62.5%		
TOTAL	100%		

AVAILABILITY ANALYSIS

Company Name: Oklahoma Panhandle State University
Job Group: 4A

FEMALE			
FACTORS	AVAILABILITY	% WEIGHT	WEIGHTED %
1. Availability of women having requisite skills in an area in which the contractor can reasonably recruit.	87.41%	80%	69.93%
2. Availability of promotable, transferable, and trainable female employees within the organization.	100%	20%	20%
FINAL AVAILABILITY			89.93%

MINORITY			
FACTORS	AVAILABILITY	% WEIGHT	WEIGHTED %
1. Availability of minorities having requisite skills in an area in which the contractor can reasonably recruit.	21.68%	80%	17.34%
2. Availability of promotable, transferable, and trainable minority employees within the organization.	12.5%	20%	2.5%
FINAL AVAILABILITY			19.84%

UTILIZATION AND GOALS ANALYSIS			
GROUP	% IN JG	UNDER Y/N	% GOALS
FEMALE	100%	No	0%
MINORITY	27.27%	No	0%
MALE	0%		
TOTAL	100%		


AVAILABILITY ANALYSIS

Company Name: Oklahoma Panhandle State University

Job Group: 4B

FEMALE			
FACTORS	AVAILABILITY	% WEIGHT	WEIGHTED %
1. Availability of women having requisite skills in an area in which the contractor can reasonably recruit.	91.62%	100%	91.62%
2. Availability of promotable, transferable, and trainable female employees within the organization.	0%	0%	0%
FINAL AVAILABILITY			91.62%

MINORITY			
FACTORS	AVAILABILITY	% WEIGHT	WEIGHTED %
1. Availability of minorities having requisite skills in an area in which the contractor can reasonably recruit.	19.3%	100%	19.3%
2. Availability of promotable, transferable, and trainable minority employees within the organization.	0%	0%	0%
FINAL AVAILABILITY			19.3%

UTILIZATION AND GOALS ANALYSIS			
GROUP	% IN JG	UNDER Y/N	% GOALS
FEMALE	100%	No	0%
MINORITY	11.11%	Yes 	19.3%
MALE	0%		
TOTAL	100%		

AVAILABILITY ANALYSIS

Company Name: Oklahoma Panhandle State University
Job Group: 5

FEMALE			
FACTORS	AVAILABILITY	% WEIGHT	WEIGHTED %
1. Availability of women having requisite skills in an area in which the contractor can reasonably recruit.	15.45%	80%	12.36%
2. Availability of promotable, transferable, and trainable female employees within the organization.	0%	20%	0%
FINAL AVAILABILITY			12.36%

MINORITY			
FACTORS	AVAILABILITY	% WEIGHT	WEIGHTED %
1. Availability of minorities having requisite skills in an area in which the contractor can reasonably recruit.	20.75%	80%	16.6%
2. Availability of promotable, transferable, and trainable minority employees within the organization.	0%	20%	0%
FINAL AVAILABILITY			16.6%

UTILIZATION AND GOALS ANALYSIS			
GROUP	% IN JG	UNDER Y/N	% GOALS
FEMALE	0%	Yes	12.36%
MINORITY	0%	Yes	16.6%
MALE	100%		
TOTAL	100%		

AVAILABILITY ANALYSIS

Company Name: Oklahoma Panhandle State University
Job Group: 6

FEMALE			
FACTORS	AVAILABILITY	% WEIGHT	WEIGHTED %
1. Availability of women having requisite skills in an area in which the contractor can reasonably recruit.	6.15%	80%	4.92%
2. Availability of promotable, transferable, and trainable female employees within the organization.	0%	20%	0%
FINAL AVAILABILITY			4.92%

MINORITY			
FACTORS	AVAILABILITY	% WEIGHT	WEIGHTED %
1. Availability of minorities having requisite skills in an area in which the contractor can reasonably recruit.	26%	80%	20.8%
2. Availability of promotable, transferable, and trainable minority employees within the organization.	0%	20%	0%
FINAL AVAILABILITY			20.8%

UTILIZATION AND GOALS ANALYSIS			
GROUP	% IN JG	UNDER Y/N	% GOALS
FEMALE	0%	Yes	4.92%
MINORITY	50%	No	0%
MALE	100%		
TOTAL	100%		

AVAILABILITY ANALYSIS

Company Name: Oklahoma Panhandle State University
Job Group: 7

FEMALE			
FACTORS	AVAILABILITY	% WEIGHT	WEIGHTED %
1. Availability of women having requisite skills in an area in which the contractor can reasonably recruit.	14.3%	100%	14.3%
2. Availability of promotable, transferable, and trainable female employees within the organization.	0%	0%	0%
FINAL AVAILABILITY			14.3%

MINORITY			
FACTORS	AVAILABILITY	% WEIGHT	WEIGHTED %
1. Availability of minorities having requisite skills in an area in which the contractor can reasonably recruit.	31.45%	100%	31.45%
2. Availability of promotable, transferable, and trainable minority employees within the organization.	0%	0%	0%
FINAL AVAILABILITY			31.45%

UTILIZATION AND GOALS ANALYSIS			
GROUP	% IN JG	UNDER Y/N	% GOALS
FEMALE	28.57%	No	0%
MINORITY	14.29%	Yes	31.45%
MALE	71.43%		
TOTAL	100%		

UTILIZATION AND GOALS ANALYSIS

Oklahoma Panhandle State University
July 1, 2010

Current Workforce																	Availability						Percentage Goals		
Job Group	IPEDS	Male	Female	Total	Minorities												Total Minority	Females			Minorities				
					Males						Females							% in Job Group	% Availability	Under-Utilized	% in Job Group	% Availability			Under-Utilized
					B	A	PI	AI	H	2+	B	A	PI	AI	H	2+									
1	1	2	2	4	0	0	0	0	0	0	0	0	0	0	2	0	2	50%	46.43%	No	50%	15.25%	No	0%	0%
1A	1	3	0	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0%	29.7%	Yes ⚠	0%	20.8%	Yes ⚠	29.7%	20.8%
1B	1	6	5	11	0	0	0	0	0	0	0	0	0	0	0	0	0	45.45%	24.42%	No	0%	10.92%	Yes ⚠	0%	10.92%
1C	1	2	8	10	0	0	0	0	0	0	0	0	0	1	0	0	1	80%	46.43%	No	10%	18.04%	Yes ⚠	0%	18.04%
1D	1	4	1	5	0	0	0	0	0	0	0	0	0	0	0	0	0	20%	32.03%	Yes ⚠	0%	14.26%	Yes ⚠	32.03%	14.26%
2A	2	7	5	12	0	0	0	0	0	0	0	0	0	0	0	0	0	41.67%	42.1%	Yes ⚠	0%	15.58%	Yes ⚠	42.1%	15.58%
2B	2	14	6	20	0	0	0	1	0	0	0	0	0	1	0	0	2	30%	43.76%	Yes ⚠	10%	16.16%	Yes ⚠	43.76%	16.16%
2C	2	14	11	25	0	0	0	0	3	0	0	0	0	0	0	0	3	44%	43.7%	No	12%	17.2%	Yes ⚠	0%	17.2%
3A	3	7	2	9	0	0	0	0	0	0	0	0	0	0	0	0	0	22.22%	32.45%	Yes ⚠	0%	20.84%	Yes ⚠	32.45%	20.84%
3B	3	10	6	16	1	0	0	0	1	0	0	0	0	0	0	0	2	37.5%	38.76%	Yes ⚠	12.5%	20.45%	Yes ⚠	38.76%	20.45%
4A	4	0	11	11	0	0	0	0	0	0	0	0	0	1	2	0	3	100%	89.93%	No	27.27%	19.84%	No	0%	0%
4B	4	0	9	9	0	0	0	0	0	0	0	0	0	1	0	0	1	100%	91.62%	No	11.11%	19.3%	Yes ⚠	0%	19.3%
5	5	2	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0%	12.36%	Yes ⚠	0%	16.6%	Yes ⚠	12.36%	16.6%
6	6	2	0	2	0	0	0	0	1	0	0	0	0	0	0	0	1	0%	4.92%	Yes ⚠	50%	20.8%	No	4.92%	0%
7	7	5	2	7	0	0	0	0	0	0	0	0	0	1	0	0	1	28.57%	14.3%	No	14.29%	31.45%	Yes ⚠	0%	31.45%
Totals		78	68	146	1	0	0	1	5	0	0	0	0	3	6	0	16								

UTILIZATION AND GOALS ANALYSIS

Goals Equaling More Than A Whole Person

Oklahoma Panhandle State University
July 1, 2010

Number of People						
Job Group	Female			Minority		
	Head Count	Yes / No	Add #	Head Count	Yes / No	Add #
1	1.86	No	0	0.61	No	0
1A	0.89	No	0	0.62	No	0
1B	2.69	No	0	1.2	Yes	1
1C	4.64	No	0	1.8	No	0
1D	1.6	No	0	0.71	No	0
2A	5.05	No	0	1.87	Yes	1
2B	8.75	Yes	2	3.23	Yes	1
2C	10.92	No	0	4.3	Yes	1
3A	2.92	No	0	1.88	Yes	1
3B	6.2	No	0	3.27	Yes	1
4A	9.89	No	0	2.18	No	0
4B	8.25	No	0	1.74	No	0
5	0.25	No	0	0.33	No	0
6	0.1	No	0	0.42	No	0
7	1	No	0	2.2	Yes	1

IDENTIFICATION OF PROBLEM AREAS 41 CFR 60-2.17(b)

A. OVERVIEW OF THE WORKFORCE

Oklahoma Panhandle State University has a total of 146 employees in 2 departments. An overview of our departments and the participation ratio of minorities and females in each of them indicate the following:

B. INDEPTH WORK FORCE ANALYSIS

1. Composition of the Work Force; the Job Area Acceptance Range - A study of the distribution of minorities and females in the workforce.

An analysis of the work force was made beginning with the application of the "JAAR" formula to all departments. Generally, the results of analyzing departments with 15 or less employees are not included in this analysis because work units of this size are not considered to be of a size significant enough to give meaningful data. However, we find it beneficial for managers to be aware of the specific EEO situation in their departments, even if the information does not have great statistical significance. Therefore, we have completed the "JAAR" analysis for each department.

Females:

An analysis of the distribution of females in our workforce shows that females make up 46.58% of our workforce and are found in all but 0 of our departments. Further, this analysis also reveals that females are underrepresented in 0 department, overrepresented in 0 department, and within range in 2 departments. This distribution pattern does not indicate that gender is a consideration in our placement policies. Employees are hired to fill vacancies that exist at the time of their hire. Once they are onboard, they are free to seek any position for which they are qualified and in which they are interested.

Minorities:


Minorities make up 10.96% of our workforce and are found in all but 0 of our departments. This analysis also reveals that minorities are underrepresented in 1 department, overrepresented in 1 department, and within range in 0 department. An employee's minority status is not an adverse consideration in any of our employment activities. Employees are hired to fill vacancies that exist at the time of their hire. Once they are onboard, they are free to seek any position for which they are qualified and in which they are interested.

We have presented both overrepresentation and under representation as are shown in the various departments. We are aware of the results of this analysis and have developed programs to ensure greater female and minority representation where required.

JAAR for ALL DEPARTMENTS

2010 AAP YEAR

Oklahoma Panhandle State University
July 1, 2010

Department	Total	Female	Minority	Female Participation		Minority Participation	
Faculty	63	27	5	42.86%	WITHIN RANGE	7.94%	UNDERREPRESENTATION 
Staff	83	41	11	49.4%	WITHIN RANGE	13.25%	OVERREPRESENTATION
TOTAL	146	68	16				
PERCENT PARTICIPATION		46.58%	10.96%				
		LOWEST	HIGHEST				
FEMALE RANGE		37.26%	55.89%				
MINORITY RANGE		8.77%	13.15%				

Explanation of Adverse Impact Analysis of Employment Action:

The Adverse Impact Analysis is a statistical measure used to determine whether discrimination is taking place in employment actions. The Adverse Impact Analysis is also known as the four-fifths rule. An adverse impact in an employment action does not prove that discrimination has taken place. It is an indicator that discrimination may have taken place and the employer must analyze the procedure to determine the cause of the adverse impact. The Adverse Impact Analysis formula and its appropriate use are found at 41 CFR 60-3.4(D).

"A selection rate for any race, sex, or ethnic group which is less than four-fifths (4/5) (or 80%) of the rate for the group with the highest rate will generally be regarded by the Federal enforcement agencies as evidence of adverse impact while a greater than four-fifths rate will generally not be regarded by Federal enforcement agencies as evidence of adverse impact. ... Where the user has not maintained data on adverse impact as required by the documentation section of applicable guidelines, the Federal enforcement agencies may draw an inference of adverse impact of the selection process from the failure of the user to maintain such data..." 41 CFR 60-3.4(D)

Explanation of Standard Deviation (z-square) Analysis:

Like the Adverse Impact Analysis, the Standard Deviation Analysis measures the difference in the rate at which males and non-minorities are selected as compared to the rate at which females and minorities are selected. In positive actions like hires and promotions, whenever male and non-minority rates of selection are 2 or more standards than are the rate at which females and minorities are selected, there will be a presumption of discrimination. The employer must review the employment actions involved to determine if the actions taken were job related and consistent with business necessity. If not, corrective actions are required to correct the disparity.

In terminations, a negative employment action, the interpretation is reversed. Whenever the rate at which females and minorities are terminated is -2 or less standards than the rate at which males and non-minorities are terminated, there will be a presumption that discrimination is involved unless the employer can show that the reasons for the terminations are job related and consistent with business necessity. If not, corrective actions are required to correct the deficiency.

Job groups with 2 or more standards requiring attention will be identified with a flag.

2. Composition of Applicant Flow & Its Relationship to the company's Hiring Experience.

Females:

Females experienced adverse impact in the Hires that took place in Job Groups 1D, 2B and 3B. Our review of the Applicant Flow Log shows that the reasons for non-selection were: 2nd best candidate, 2nd best candidate for position, 3rd best candidate for position, accepted employment elsewhere, add'l duties would detract from original position as Ins Coordinator, best candidate, best candidate-Replace for Sage Woodham/resigned, best candidate-replacement for Carl Thomas Lewis, deceased 2-28-10, candidate interview was very poor. Extremely shy not well suited to the classroom, continued her education; withdrew her name, could not come for an interview, could not come for interview, declined offer, did not have USA work visa, did not hold requested degrees or have requested experience, did not meet education requirements, did not meet qualifications, eliminated in CV round, had a degree in Ag Business not Biology or life science, inexperience in clerical field, inexperience in collegiate/clerical field, lack of education, lack of experience, lack of experience and education, lack of required education, not best candidate, not best qualified candidate, not enough money, not most qualified, not strong enough candidate, Not the best qualified candidate, offered job but could not start in time frame, over qualified, per references, not a good fit, phone interview determined the candidates English skills were poor, submitted incomplete application, submitted incomplete application, submitted incomplete application, submitted incomplete application, vocal performance with no conducting or classroom teaching experience, wasn't a pitching coach, withdrew, and withdrew - not enough money.

Minorities:

Minorities experienced adverse impact in the Hires that took place in Job Groups 1D, 2B, 2C, 3B and 4A. Our review of the Applicant Flow Log shows that the reasons for non-selection were: best candidate, did not meet qualifications, eliminated in CV round, inexperience in clerical field, lack of experience, no other candidates, not best qualified candidate, not enough money, and withdrew.

ADVERSE IMPACT ANALYSIS

2010 AAP YEAR

Hires to Applicants														
Oklahoma Panhandle State University July 1, 2009 through June 30, 2010														
Applicants					Hires									
Job Group	Male	Female	Minority	Non-Minority	Male	% Male	Female	% Female	Females Adversely Affected?	Minority	% Minority	Non-Minority	% Non-Minority	Minorities Adversely Affected?
1	4	2	3	3	1	25%	0	0%	YES ⚠	1	33.33%	1	33.33%	NO
									NO					NO
1A									NO					NO
1B									NO					NO
1C	2	0	2	0	1	50%	0	0%	NO	0	0%	1	0%	NO
1D	1	6	1	6	1	100%	0	0%	YES ⚠	0	0%	1	16.67%	YES ⚠
2A	0	2	0	2	0	0%	1	50%	NO	0	0%	1	50%	NO
2B	17	18	30	5	1	5.88%	0	0%	YES ⚠	0	0%	1	20%	YES ⚠
2C	32	14	36	10	2	6.25%	1	7.14%	NO	0	0%	3	30%	YES ⚠
3A									NO					NO
3B	70	62	112	20	5	7.14%	3	4.84%	YES ⚠	3	2.68%	5	25%	YES ⚠
4A	2	69	31	40	0	0%	5	7.25%	NO	0	0%	5	12.5%	YES ⚠
7	1	0	0	1	0	0%	0	0%	NO	0	0%	0	0%	NO
Totals	129	173	215	87	11		10			4		18		

Total Applicants	302
Total Hires	21

Standard Deviation Analysis of Hires vs. Applicants.

Females:

A standard deviation of 2 or greater when comparing males vs. females was found in job group 1D. Our analysis has indicated that there is zero participation by females in the job group 1C and 7.

Minorities:

There was no standard deviation greater than 2 found in the hires analysis of minorities. Our analysis has indicated that there is zero participation by minorities in the job group 2A and 7.

Standard Deviation - Hires to Applicants

Oklahoma Panhandle State University
July 1, 2010

Job Group	# of Standard Deviations Represented									
	Male vs. Female					Non-Minortiy vs. Minority				
	Male		Female		Standard Deviation	Non-Minortiy		Minority		Standard Deviation
	Selected	Total	Selected	Total		Selected	Total	Selected	Total	
	1	4	0	2	0.77	1	3	1	3	0
1										
1A										
1B										
1C	1	2	0	0	N/A ⚠	1	0	0	2	N/A
1D	1	1	0	6	2.65 ⚠	1	6	0	1	0.44
2A	0	0	1	2	N/A	1	2	0	0	N/A ⚠
2B	1	17	0	18	N/A	1	5	0	30	N/A
2C	2	32	1	14	N/A	3	10	0	36	N/A
3A										
3B	5	70	3	62	N/A	5	20	3	112	N/A
4A	0	2	5	69	-0.39	5	40	0	31	N/A
7	0	1	0	0	N/A ⚠	0	1	0	0	N/A ⚠

N/A = Insufficient numbers to complete the analysis.

⚠ = 0 Female Employees, 0 Minority Employees, or a Standard Deviation of 2 or greater in the respective job group.

3. Promotions

Females:

There was no adverse impact against females in the Promotions that took place during this reporting period.

Minorities:

Minorities experienced adverse impact in the Promotions that took place in Job Group 4B. The promotions were a result of none.

ADVERSE IMPACT ANALYSIS

2010 AAP YEAR

Promotions														
Oklahoma Panhandle State University July 1, 2009 through June 30, 2010														
Incumbents					Promotions									
Job Group	Male	Female	Minority	Non-Minority	Male	% Male	Female	% Female	Females Adversely Affected?	Minority	% Minority	Non-Minority	% Non-Minority	Minorities Adversely Affected?
	0	0	0	0	0	0%	0	0%	NO	4	0%	0	0%	NO
1	2	2	2	2					NO					NO
1A	3	0	0	3					NO					NO
1B	6	5	0	11					NO					NO
1C	2	8	1	9					NO					NO
1D	4	1	0	5					NO					NO
2A	7	5	0	12					NO					NO
2B	14	6	2	18					NO					NO
2C	14	11	3	22					NO					NO
3A	7	2	0	9					NO					NO
3B	10	6	2	14					NO					NO
4A	0	11	3	8					NO					NO
4B	0	9	1	8	0	0%	2	22.22%	NO	0	0%	2	25%	YES ⚠
5	2	0	0	2					NO					NO
6	2	0	1	1					NO					NO
7	5	2	1	6					NO					NO
Total	78	68	16	130	0		2			4		2		

Total Incumbents	146
Total Promotions	2

Standard Deviation Analysis of Promotions.

Females:

There was no standard deviation greater than 2 found in the promotions analysis of females. Our analysis has indicated that there is zero participation by females in the job group 4B.

Minorities:

There was no standard deviation greater than 2 found in the promotions analysis of minorities. Our analysis has indicated that there is zero participation by minorities in the job group 4B.

Standard Deviation - Promotions

Oklahoma Panhandle State University
July 1, 2010

Job Group	# of Standard Deviations Represented									
	Male vs. Female					Non-Minortiy vs. Minority				
	Male		Female		Standard Deviation	Non-Minortiy		Minority		Standard Deviation
	Selected	Total	Selected	Total		Selected	Total	Selected	Total	
	0	1	0	1	0	0	1	4	1	N/A
1										
1A										
1B										
1C										
1D										
2A										
2B										
2C										
3A										
3B										
4A										
4B	0	1	2	0	N/A ⚠	2	1	0	0	N/A ⚠
5										
6										
7										

N/A = Insufficient numbers to complete the analysis.

⚠ = 0 Female Employees, 0 Minority Employees, or a Standard Deviation of 2 or greater in the respective job group.

4. Terminations

Females:

There was no adverse impact against females in the Terminations for Cause that took place during this reporting period.

Minorities:

There was no adverse impact against minorities in the Terminations for Cause that took place during this reporting period.

ADVERSE IMPACT ANALYSIS

2010 AAP YEAR

Terminations - All														
Oklahoma Panhandle State University July 1, 2009 through June 30, 2010														
Incumbents					Terminations - All									
Job Group	Male	Female	Minority	Non-Minority	Male	% Male	Female	% Female	Females Adversely Affected?	Minority	% Minority	Non-Minority	% Non-Minority	Minorities Adversely Affected?
	0	0	0	0	2	0%	1	0%	NO	2	0%	3	0%	NO
1	2	2	2	2					NO					NO
1A	3	0	0	3					NO					NO
1B	6	5	0	11					NO					NO
1C	2	8	1	9	1	50%	0	0%	NO	0	0%	1	11.11%	NO
1D	4	1	0	5					NO					NO
2A	7	5	0	12	1	14.29%	1	20%	YES	0	0%	2	16.67%	NO
2B	14	6	2	18					NO					NO
2C	14	11	3	22	4	28.57%	0	0%	NO	2	66.67%	2	9.09%	YES
3A	7	2	0	9					NO					NO
3B	10	6	2	14	2	20%	3	50%	YES	1	50%	4	28.57%	YES
4A	0	11	3	8	0	0%	3	27.27%	NO	0	0%	3	37.5%	NO
4B	0	9	1	8	0	0%	3	33.33%	NO	0	0%	3	37.5%	NO
5	2	0	0	2					NO					NO
6	2	0	1	1					NO					NO
7	5	2	1	6					NO					NO
Total	78	68	16	130	10		11			5		18		

Total Incumbents	146
Total Terminations	21

ADVERSE IMPACT ANALYSIS

2010 AAP YEAR

Terminations - For Cause														
Oklahoma Panhandle State University														
July 1, 2009 through June 30, 2010														
Incumbents					Terminations - For Cause									
Job Group	Male	Female	Minority	Non-Minority	Male	% Male	Female	% Female	Females Adversely Affected?	Minority	% Minority	Non-Minority	% Non-Minority	Minorities Adversely Affected?
1	2	2	2	2					NO					NO
1A	3	0	0	3					NO					NO
1B	6	5	0	11					NO					NO
1C	2	8	1	9	1	50%	0	0%	NO	0	0%	1	11.11%	NO
1D	4	1	0	5					NO					NO
2A	7	5	0	12					NO					NO
2B	14	6	2	18					NO					NO
2C	14	11	3	22					NO					NO
3A	7	2	0	9					NO					NO
3B	10	6	2	14					NO					NO
4A	0	11	3	8					NO					NO
4B	0	9	1	8					NO					NO
5	2	0	0	2					NO					NO
6	2	0	1	1					NO					NO
7	5	2	1	6					NO					NO
Total	78	68	16	130	1		0			0		1		

Total Incumbents	146
Total Terminations	1

Standard Deviation Analysis of Terminations.

Females:

There was no standard deviation greater than 2 found in the terminations analysis of females.

Minorities:


There was no standard deviation greater than 2 found in the terminations analysis of minorities.

Standard Deviation - Terminations

Oklahoma Panhandle State University
July 1, 2010

Job Group	# of Standard Deviations Represented									
	Male vs. Female					Non-Minortiy vs. Minority				
	Male		Female		Standard Deviation	Non-Minortiy		Minority		Standard Deviation
	Selected	Total	Selected	Total		Selected	Total	Selected	Total	
1										
1A										
1B										
1C	1	2	0	8	2.11	1	9	0	1	0.35
1D										
2A										
2B										
2C										
3A										
3B										
4A										
4B										
5										
6										
7										

N/A = Insufficient numbers to complete the analysis.

 = 0 Female Employees, 0 Minority Employees, or a Standard Deviation of 2 or greater in the respective job group.

5. Compensation Analysis

In the following display, we have completed an annual analysis of the compensation of all employees listed as full time. The formula used in the compensation analysis is found in the EO Survey utilized by the OFCCP. The report is designed to show the relationships between male and female and minority and non-minority salaries as they are found in the various job groups. Salaries displayed compare total minority and non-minority male and female salaries and then displays the salaries of both groups showing the low, high, and average minority male and non-minority males and female salaries.

COMPENSATION ANALYSIS - FEMALES

2010 AAP YEAR

Oklahoma Panhandle State University
July 1, 2010

Job Group	TOT EMP	Minority Females				TOT EMP	Non-Minority Females			
	#	Total \$	Low	High	Average	#	Total \$	Low	High	Average
1	2	\$154,410.00	\$66,150.00	\$88,260.00	\$77,205.00					
1A										
1B						5	\$305,073.00	\$53,566.00	\$71,270.00	\$61,014.60
1C	1	\$48,826.00	\$48,826.00	\$48,826.00	\$48,826.00	7	\$263,150.00	\$26,460.00	\$47,694.00	\$37,592.86
1D						1	\$33,193.00	\$33,193.00	\$33,193.00	\$33,193.00
2A						5	\$268,113.00	\$41,046.00	\$76,285.00	\$53,622.60
2B	1	\$34,760.00	\$34,760.00	\$34,760.00	\$34,760.00	5	\$213,799.00	\$39,801.00	\$47,117.00	\$42,759.80
2C						11	\$322,170.00	\$15,627.00	\$38,587.00	\$29,288.18
3A						2	\$113,000.00	\$38,000.00	\$75,000.00	\$56,500.00
3B						6	\$131,813.00	\$5,000.00	\$32,827.00	\$21,968.83
4A	3	\$85,707.00	\$25,000.00	\$33,145.00	\$28,569.00	8	\$245,533.00	\$22,050.00	\$39,000.00	\$30,691.63
4B	1	\$20,848.00	\$20,848.00	\$20,848.00	\$20,848.00	8	\$120,784.00	\$5,319.00	\$21,997.00	\$15,098.00
5										
6										
7	1	\$15,979.00	\$15,979.00	\$15,979.00	\$15,979.00	1	\$16,968.00	\$16,968.00	\$16,968.00	\$16,968.00

COMPENSATION ANALYSIS - MALES

2010 AAP YEAR

Oklahoma Panhandle State University
July 1, 2010

Job Group	TOT EMP	Minority Males				TOT EMP	Non-Minority Males			
	#	Total \$	Low	High	Average	#	Total \$	Low	High	Average
1						2	\$218,250.00	\$66,000.00	\$152,250.00	\$109,125.00
1A						3	\$344,211.00	\$110,000.00	\$119,211.00	\$114,737.00
1B						6	\$432,014.00	\$61,000.00	\$91,680.00	\$72,002.33
1C						2	\$105,450.00	\$45,450.00	\$60,000.00	\$52,725.00
1D						4	\$103,060.00	\$10,000.00	\$42,560.00	\$25,765.00
2A						7	\$339,375.00	\$41,101.00	\$58,064.00	\$48,482.14
2B	1	\$43,619.00	\$43,619.00	\$43,619.00	\$43,619.00	13	\$505,724.00	\$24,000.00	\$45,556.00	\$38,901.85
2C	3	\$110,568.00	\$35,413.00	\$38,155.00	\$36,856.00	11	\$365,825.00	\$15,627.00	\$46,066.00	\$33,256.82
3A						7	\$291,750.00	\$5,788.00	\$65,000.00	\$41,678.57
3B	2	\$41,962.00	\$16,962.00	\$25,000.00	\$20,981.00	8	\$188,796.00	\$6,000.00	\$37,747.00	\$23,599.50
4A										
4B										
5						2	\$66,000.00	\$21,000.00	\$45,000.00	\$33,000.00
6	1	\$31,091.00	\$31,091.00	\$31,091.00	\$31,091.00	1	\$30,912.00	\$30,912.00	\$30,912.00	\$30,912.00
7						5	\$152,302.00	\$21,176.00	\$38,488.00	\$30,460.40

Standard Deviation Analysis of Salaries.

Females:













A standard deviation of 2 or greater when comparing males vs. females was found in job groups 1B, 1C and 7. Our analysis has indicated that there is zero participation by females in job groups 1A, 5 and 6.

Minorities:


There was no standard deviation greater than 2 found in the salary analysis of minorities. Our analysis has indicated that there is zero participation by minorities in the job groups 1A, 1B, 1D, 2A, 3A and 5.

Standard Deviation Analysis of Salaries

Oklahoma Panhandle State University
July 1, 2010

Job Group	# of Standard Deviations Represented					
	Male vs. Female			Non-Minority vs. Minority		
	Total Male	Total Female	Standard Deviation	Total Non-Minority	Total Minority	Standard Deviation
1	2	2	1.01	2	2	1.01
1A	3	0	N/A 	3	0	N/A 
1B	6	5	2.15 	11	0	N/A 
1C	2	8	2.54 	9	1	N/A
1D	4	1	N/A	5	0	N/A 
2A	7	5	-1.02	12	0	N/A 
2B	14	6	-0.92	18	2	0.21
2C	14	11	1.55	22	3	-1.15
3A	7	2	-1.05	9	0	N/A 
3B	10	6	0.22	14	2	0.26
4A	0	11	N/A	8	3	0.66
4B	0	9	N/A	8	1	N/A
5	2	0	N/A 	2	0	N/A 
6	2	0	N/A 	1	1	N/A
7	5	2	2.5 	6	1	N/A

N/A = Insufficient numbers to complete the analysis.

 = 0 Female Employees, 0 Minority Employees, or a Standard Deviation of 2 or greater in the respective job group.

- = Analysis could not be completed due to Exempt, Commissioned, and/or 'N/A' Salaries

6. Facilities and Company-Sponsored Programs

Facility and company-sponsored programs are available to all employees in accordance with our Equal Opportunity Policy. No problems have been identified in this area.

7. Seniority Practices

An employee's experience with Oklahoma Panhandle State University is of great importance to us as it gives us the surety of a correct and expeditious performance of work assignments. We monitor this element of an employee's work history and are certain that no discrimination is found in our seniority policy or practice.

8. OJT is available.

9. Work force attitude

Our experience supports the conclusion that there is no serious lack of support and commitment by managers to implement the Company's EEO policy. Lack of support of EEO/AA by any manager will not be tolerated.

10. Technical Compliance Phase

All technical phases of compliance are being met. All required posters are exhibited where applicants and employees may review them. The required certifications to recruitment sources are sent out at least annually. Applications and related employment data are maintained as required by federal legislation and guidelines.

C. ANALYSIS CONCLUSIONS:

Oklahoma Panhandle State University has conducted these analyses in order to ensure that our commitment to EEO and Affirmative Action is being fully implemented. Having completed such analyses, we have concluded the following:

1. Where underutilization in any job group exists, as that term is defined in the regulation [see 41 CFR 60-2.15], goals and timetables have been established.
2. The lateral and vertical movement of minority and women employees is occurring at a generally satisfactory rate, given their availability. Significant problems do not exist concerning promotions and improved job opportunities for minorities and women.

3. The minority and female participation in our work force overall indicate that their presence is at a rate that is generally characteristic of similar industries in our area. Oklahoma Panhandle State University has recruited extensively for qualified minorities and females. We will continue to seek minorities and females to fill all openings in our work force.
4. Application forms and related pre-employment inquiry forms comply with applicable federal, state and local EEO laws.
5. The mental and physical job requirements for all positions in the company are reviewed for accuracy on an ongoing basis with special attention given to new positions as they are added to the work force.
6. Where Oklahoma Panhandle State University uses specific selection procedures for its jobs, they are job-related. Further, in compliance with the Uniform Guidelines on Employee Selection Procedures, job groups will continue to be studied for the purpose of ensuring that our selection process does not have any adverse impact on minorities and women.
7. The referral ratio of qualified minorities and women to the hiring supervisor or manager does not indicate that a higher percentage of minorities or women are being unreasonably rejected as compared to the percentage of non-minorities or men. Personnel fully cognizant of our EEO policy perform employment interviewing and screening.
8. Minorities and women are not excluded from any company-sponsored activities or programs and such programs are fully integrated.
9. No de facto segregation exists at Oklahoma Panhandle State University.
10. No artificial barriers or restrictive seniority provisions that result in overt or inadvertent discrimination exist. The rate of upward mobility of women and minorities is reasonable, given their availability.
11. Support for our Equal Employment Opportunity policy on the part of managers, supervisors and employees is strong. The written Affirmative Action Compliance Plan is fully communicated to all levels of management.

12. The techniques that have been established for evaluating the effectiveness of our AAP includes periodic review of the employment data. Further, the EEO Officer will continue to make periodic reports to management regarding the status of the AAP and the progress being made.
13. There is no lack of access to suitable housing, which might impede the employment of minorities and women by Oklahoma Panhandle State University.
14. Transportation, both public and private, is not a significant problem with respect to minority and female employment.
15. Subcontractors and suppliers utilized by us are advised of their EEO responsibilities. Further, purchase orders contain the required Equal Opportunity Clause. (See Appendix)
16. EEO posters provided by the federal government are prominently displayed in appropriate places at Oklahoma Panhandle State University.

DEVELOPMENT AND EXECUTION OF ACTION ORIENTED PROGRAMS 41 CFR 60-2.17(c)

A. The company will continue to take the following actions:

1. Conduct a detailed analysis of position descriptions to ensure that they actually reflect position functions and are consistent for the same position from one location to another. This analysis is conducted each time a vacant position is filled by a promotion or hiring action. Additionally, we have established a schedule for the review of the mental and physical qualifications of all positions at Oklahoma Panhandle State University. This analysis involves the identification of the essential job functions and is a positive response to the demands of the ADA of 1990. (See schedule in the Veterans and Disabled AAPs)

Responsible Official: Cheryl Ashpaugh, EEO Officer
Completion Date: Ongoing project

2. On a continuous basis, Oklahoma Panhandle State University reviews worker specification throughout the organization giving special attention to academic, experience, and skill requirements to ensure such requirements do not constitute inadvertent discrimination.

Responsible Official: Cheryl Ashpaugh, EEO Officer
Completion Date: Ongoing project

3. Evaluate the total selection process to ensure freedom from bias and aid in the attainment of goals and objectives.

Responsible Official: Cheryl Ashpaugh, EEO Officer
Completion Date: Ongoing project

4. Aggressively recruit minority and female applicants seeking out those qualified to perform our jobs. This activity bolsters our commitment to increase the minority and female participation in our work force. We will continue to seek out women in skilled areas by working closely with the Vo-Tech centers, the State Employment Service, and other sources made available to us.

Responsible Official: Cheryl Ashpaugh, EEO Officer
Completion Date: Ongoing project

5. Minority and female employees are given equal opportunity for promotion. We actively encourage minorities and females to seek out job advancement.

Responsible Official: Cheryl Ashpaugh, EEO Officer
Completion Date: Ongoing project

6. Facilities and company-sponsored social and recreational activities are desegregated and we will actively encourage all employees to participate.

Responsible Official: Cheryl Ashpaugh, EEO Officer
Completion Date: Ongoing project

7. Training programs are readily available to minorities and females within the company in many areas of the company's work force. All programs are equally available to both females and minorities.

Responsible Official: Cheryl Ashpaugh, EEO Officer
Completion Date: Ongoing project

INTERNAL AUDIT REPORTING SYSTEMS 41 CFR 60-2.17(d)

Oklahoma Panhandle State University believes that one of the most important elements for effective implementation of a written Affirmative Action Plan is an adequate internal audit and reporting system. Through this system, progress can be monitored and management kept continuously informed. For this purpose, we have established the following internal audit and reporting system.

1. Records of applicants, hires, promotions, and terminations will continue to be monitored at all levels to ensure that our EEO policy is carried out. Records of hires, promotions, transfers and separations will continue to be maintained by job groups.
2. Progress toward meeting goals and timetables will continue to be measured periodically.
3. The EEO Officer is responsible for reviewing report results periodically with appropriate levels of management.
4. Where necessary, the EEO Officer communicates regularly, at least on an annual basis, with senior management concerning recommendations to improve EEO performance.
5. Diagram(s) of employment actions have been added to our audit and reporting system. It clearly shows employment activity by job group allowing a clear grasp of actions taken.
6. Promotions are defined as a move upward in job groups. Transfers are defined as a move within a job group.

INTERNAL AUDIT OF EMPLOYMENT ACTIONS

Oklahoma Panhandle State University
For the period July 1, 2009 through June 30, 2010

Job Group	Applicants			Hires			Promotions			Transfers			Terminations		
	TOT	FEM	MIN	TOT	FEM	MIN	TOT	FEM	MIN	TOT	FEM	MIN	TOT	FEM	MIN
1															
1A															
1B															
1C	2	0	2	1	0	0							1	0	0
1D	7	6	1	1	0	0									
2A	2	2	0	1	1	0							2	1	0
2B	35	18	30	1	0	0									
2C	46	14	36	3	1	0							4	0	2
3A															
3B	132	62	112	8	3	3							5	3	1
4A	71	69	31	5	5	0							3	3	0
4B							2	2	0				3	3	0
5															
6															
7	1	0	0												

A discussion of these actions can be found in Chapter 7 of this AAP.

ANALYSIS OF PRIOR YEAR GOALS

In the following display, in those job groups in which a female or minority goal amounts to less than a full person, and no placement of females or minorities took place in that job group during this reporting period, we state that the goal has been met. Since there is no obligation to meet a goal of less than a person, this statement represents our positive, but unsuccessful efforts, to meet our goals. To say that we did not meet a goal when that goal is less than a full person makes no more sense than to say we met a partial person goal since in either case, the obligation to meet the goal has ceased to bind.

ANALYSIS OF ANNUAL GOALS FOR THE PRIOR YEAR

Oklahoma Panhandle State University
July 1, 2010

Job Group	% Goals		Placements							Female Goals Met	Minority Goals Met
	Date: July 1, 2009		For the period July 1, 2009 through June 30, 2010							Yes / No	Yes / No
	Female	Minority	Total Placements	Expected		Actual		Difference			
			Female	Minority	Female	Minority	Female	Minority			
1	0%	0%	0	0	0	0	0	0	0	N/A	N/A
1A	29.7%	20.8%	0	0	0	0	0	0	0	N/A	N/A
1B	0%	10.92%	0	0	0	0	0	0	0	N/A	N/A
1C	0%	18.04%	1	0	0	0	0	0	0	Yes	Yes
1D	32.03%	14.26%	1	0	0	0	0	0	0	Yes	Yes
2A	42.1%	15.58%	1	0	0	1	0	1	0	Yes	Yes
2B	43.76%	16.16%	1	0	0	0	0	0	0	Yes	Yes
2C	0%	17.2%	3	0	0	1	0	1	0	Yes	Yes
3A	32.45%	20.84%	0	0	0	0	0	0	0	N/A	N/A
3B	38.76%	20.45%	8	3	1	3	3	0	2	Yes	Yes
4A	0%	0%	7	0	0	7	0	7	0	Yes	Yes
4B	0%	19.3%	0	0	0	0	0	0	0	N/A	N/A
5	12.36%	16.6%	0	0	0	0	0	0	0	N/A	N/A
6	4.92%	0%	0	0	0	0	0	0	0	N/A	N/A
7	0%	31.45%	0	0	0	0	0	0	0	N/A	N/A

COMPLIANCE WITH SEX DISCRIMINATION GUIDELINES 41 CFR 60-20

Oklahoma Panhandle State University complies with the sex discrimination guidelines issued by OFCCP and set forth in 41 CFR 60-20, as follows:

- Oklahoma Panhandle State University's employment advertising does not express a sex preference and, if printed, does not appear in sex segregated columns. Individuals of both sexes are recruited for all jobs.
- Oklahoma Panhandle State University's policy manual states that there will be no discrimination on account of sex.
- Oklahoma Panhandle State University recruits employees of both sexes for all positions.
- Oklahoma Panhandle State University does not rely upon a state "protective" laws to deny women employees the right to any job they are qualified to perform.
- Oklahoma Panhandle State University offers employees of both sexes an equal employment opportunity for any jobs they are qualified to perform.
- Oklahoma Panhandle State University does not make any distinction between married and unmarried persons of one sex that is not made between married and unmarried persons of the other sex.
- Oklahoma Panhandle State University does not deny employment to women with young children.
- Oklahoma Panhandle State University provides appropriate physical facilities to both sexes.
- Oklahoma Panhandle State University does not penalize, in conditions of employment, employees who require time away from work for childbearing. Employees returning to work following childbirth shall be reinstated to their original job or to a position of like status and pay, without loss of service credits.

- Disabilities caused by or contributed to by pregnancy, childbearing, or related medical conditions are treated the same as disabilities caused by or contributed to by other medical conditions under the Company's insurance plan.
- Oklahoma Panhandle State University does not, on the basis of sex, specify any differences between men and women employees in either mandatory or optional retirement age.
- Oklahoma Panhandle State University's wage schedules are not related to or based upon sex.
- Oklahoma Panhandle State University does not restrict one sex to certain job groups.

In addition to the above, Oklahoma Panhandle State University will continue to take affirmative action as follows:

- Encourage women to apply for all positions in Oklahoma Panhandle State University for which they are qualified.
- Encourage women to participate in management training programs if and when used by Oklahoma Panhandle State University.
- Encourage women to apply for all training programs that can facilitate their ability to advance.

Company management has been made aware of the requirements set forth above. Further, the principles contained in these guidelines have been incorporated into the EEO policy of Oklahoma Panhandle State University.

GUIDELINES ON DISCRIMINATION BECAUSE OF RELIGION OR NATIONAL ORIGIN 41 CFR 60-50

COMPANY POLICY ON RELIGION AND NATIONAL ORIGIN

It is the policy of Oklahoma Panhandle State University to ensure equal employment opportunity to all employees without regard to religion or national origin. We have and will continue to hire applicants and to employ, promote, transfer, recruit, layoff or terminate employees for employment, as well as ensure that compensation and selection for training are accomplished without regard to religion or national origin. We ensure through the review of our policies and procedures that various religious and ethnic groups receive fair consideration for all job opportunities. Should deficiencies be identified, appropriate outreach and recruitment activities will be undertaken to correct them. Some of our affirmative actions are:

1. Through internal communications and appropriate procedures we try to foster understanding, acceptance and support to ensure equal employment opportunity for all persons regardless of religion or national origin.
2. Periodically, we inform all employees verbally or in writing of our commitment to equal employment opportunity for all persons regardless of religion or national origin.
3. We enlist the assistance and support of recruitment sources to refer prospective employees without regard to religion or national origin. As appropriate, we seek out applicants from educational institutions with a substantial enrollment of students from various religious and ethnic groups.
4. We review employment records to determine the availability of promotable and transferable employees without regard to their religious or ethnic affiliation.
5. We use religious and ethnic media for institutional and employment advertising when appropriate.

6. We make reasonable accommodations to the religious observances and practices of employees and prospective employees, especially to those who regularly observe Friday evening and Saturday or some other day of the week as their Sabbath. Further, we accommodate those who observe certain religious holidays during the year unless undue hardship is involved. To determine what constitutes undue hardship, the following factors are considered:
 - a. Business necessity
 - b. Financial costs and expenses
 - c. Resulting personnel problems

Oklahoma Panhandle State University
AFFIRMATIVE ACTION PROGRAM
FOR THE DISABLED,
DISABLED VETERANS,
VIETNAM-ERA VETERANS,
AND OTHER VETERANS

Prepared in accordance with
41 CFR Chapter 60-250 and 60-741

Cheryl Ashpaugh
EEO Officer

Dr. David A. Bryant
President

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POLICY

Oklahoma Panhandle State University is committed to the principles of Equal Employment Opportunity and Affirmative Action. It is our policy to carry out our employment actions in a positive manner to ensure equal employment opportunity for all employees and applicants without regard to disability, Vietnam, disabled, or other veteran status. We do not discriminate against any employee or applicant including disabled people, Vietnam, disabled, or other veterans in regard to any position for which they are qualified. This policy applies to all employment practices, including, but not limited to: Hiring, upgrading, demotion or transfer, recruitment or recruitment advertising, layoff or termination, rates of pay or other forms of compensation, and selection for training. Further, we are committed to make reasonable accommodations to the mental and physical limitations of individuals with disabilities, except in instances in which it would cause an undue hardship on the operation of the company.

This position is reaffirmed annually by the President to all employees and applicants. This commitment is incorporated in our company's EEO/AA policy statement and communicated to all employees, applicants, and appropriate organizations. All employees, especially managers and supervisors, are enjoined to carry out this commitment in their areas of work and responsibility.

IMPLEMENTATION

The President's Office is responsible for the administration of the Equal Employment Opportunity (EEO) and Affirmative Action (AA) policies. The President's reaffirmation of the company's commitment to the principles of EEO/AA, posted annually, clearly states that implementation of the EEO policy is everyone's responsibility. All managers and other designated EEO/Affirmative Action Representatives (AARs) have specific EEO/AA responsibilities.

Oklahoma Panhandle State University implements the Affirmative Action Program for the Disabled, Disabled Veterans, Vietnam Era Veterans, and Other Veterans by the following actions:

- Consider qualified individuals with disabilities and covered veterans without discrimination in the administration of its personnel procedures.
- Provide information, training, and counseling to all employees, supervisors, and managers in order to gain positive support and understanding of the Affirmative Action Program for individuals with disabilities and for covered veterans.
- Publicize and monitor the Affirmative Action Program for individuals with disabilities and for covered veterans.
- Inform employees of Oklahoma Panhandle State University's policy on the employment of individuals with disabilities and of covered veterans.
- Work closely with the state employment service and other organizations and institutions servicing individuals with disabilities and covered veterans.
- Make reasonable accommodations (by removing architectural barriers, restructuring the work sites and job duties, obtaining passive devices, etc.) to the physical and mental limitations of employees or applicants.

- Include individuals with disabilities and covered veterans when Oklahoma Panhandle State University employees are identified in advertisements for jobs.
- Provide information to all employees regarding changes in Oklahoma Panhandle State University's policies and procedures.
- Include appropriate clauses in non-exempt contracts and subcontracts, including those with vendors, suppliers, and unions, as appropriate.
- Post in conspicuous places, available to employees and applicants, notices that state our obligations under the law and affirm that Oklahoma Panhandle State University takes affirmative action to employ and advance in employment qualified individuals with disabilities and covered veterans.
- Continue to implement a program for the placement of individuals with disabilities and covered veterans for the purpose of utilizing the skills and talents that they can and do bring to the work force.

DISSEMINATION

A. INTERNAL DISSEMINATION

Oklahoma Panhandle State University's Affirmative Action Policy is available to all employees in the following ways:

1. Annual Statement of Commitment: Each year the President will post a reaffirmation the EEO/AA Policy Statement to all employees.
2. Affirmative Action Program: Oklahoma Panhandle State University's affirmative action program will continue to be revised annually and distributed by the EEO Officer to all management offices. The Equal Employment Opportunity Policy and federally required Equal Employment Opportunity Posters affirming our nondiscrimination policy are posted on official bulletin boards in public locations and work areas.
3. Training: Oklahoma Panhandle State University's EEO/AA Policy regarding individuals with disabilities and covered veterans is communicated to all managers, supervisors and employees. All managers and supervisors are required to become familiar with the contents of the Affirmative Action Program. Manager's/supervisor's performance is evaluated, in part, based on his or her Equal Employment Opportunity and Affirmative Action efforts.

B. EXTERNAL DISSEMINATION

Oklahoma Panhandle State University will continue to disseminate information externally to various community and state organizations about Equal Employment Opportunity and Affirmative Action. Oklahoma Panhandle State University has and will maintain liaison with local organizations and institutions that service individuals with disabilities and covered veterans to recruit qualified individuals. All job advertisements published externally state the company is an "Equal Opportunity Employer."

PERSONNEL PROCEDURES

Oklahoma Panhandle State University is committed to the principles of Equal Employment Opportunity and Affirmative Action. It is the company's policy to comply with all Federal and State regulations pertaining to Equal Employment Opportunity.

A. GENERAL PROCEDURES

State employment agencies, vocational rehabilitation agencies, state education agencies, and various community agencies will be used as recruiting sources. When necessary, Veteran Employment Representatives, local Veteran Administration Offices, and local Vietnam Era Veterans' organizations will continue to be contacted for guidance and/or technical assistance on the possible development of on-the-job training opportunities for covered veterans.

Meetings are available for interested rehabilitation agencies to acquaint their counselors with the physical aspects of company work areas and typical job requirements.

Physical and mental job qualification requirements are reviewed on an on-going basis to ensure that, to the extent qualification requirements tend to screen out qualified individuals with disabilities and covered veterans, they are job related, consistent with business necessity, and the safe performance of the job.

Personnel procedures are reviewed annually to determine that present procedures assure careful, thorough, and systematic consideration of the job qualifications of known individuals with disabilities, disabled and Vietnam Era veteran applicants.

In offering employment or promotion to individuals with disabilities, disabled veterans, veterans of the Vietnam era, and other veterans Oklahoma Panhandle State University does not reduce the amount of compensation offered because of any disability income, pension or other benefit the applicant or employee receives from another source.

All job openings are listed with the State Employment Service with the exception of top-level management, jobs filled internally, and those jobs lasting 3 days or less.

Employment records are reviewed to determine the availability of promotable/transferable qualified known individuals with disabilities and covered veterans.

Recruiting and employment personnel and the EEO Officer are primarily responsible for observing the Affirmative Action obligations in the employment and placement of qualified individuals with disabilities and covered veterans. Any individual with disabilities or covered veteran applicant can request a job accommodation. Company management reviews the request and an appropriate decision is made. Information obtained from medical examinations is used only to establish work restrictions and to provide safeguards for individuals who might require emergency medical treatment. The information is not used to exclude or otherwise limit employment opportunities of qualified individuals.

Every applicant has the opportunity to identify himself or herself as disabled and/or as a covered veteran. All medical information concerning individuals with disabilities or covered veterans will be used only to meet safety requirements and to make reasonable accommodations for any disability. Information regarding disability and veteran status is both voluntary and confidential.

B. RESPONSIBILITIES OF THE EEO OFFICER WITH REGARD TO INDIVIDUALS WITH DISABILITIES AND COVERED VETERANS

Oklahoma Panhandle State University, in keeping with its commitment to the principles of Affirmative Action and Equal Employment Opportunity, appointed the EEO Officer who is responsible for the Disabled, Disabled Veterans, Vietnam Era Veterans, and Other Veterans Programs. The duties of this position are as follows:

- Receive all requests for assistance in accommodating the disabilities of an employee.
- Assist individuals with disabilities and covered veterans with job development.
- Develop contacts with interested referral agencies to assess and promote interest in disabled/covered veteran placement.

- Develop and implement programs for the recruiting and placement of qualified individuals with disabilities and covered veterans.
- Review applicants who are disabled/covered veterans concerning work skills, education, and training.
- Review the regulations and keep informed of all new or updated legislation to ensure that the company is in compliance with Federal and State laws.
- Assist company authorities in drawing up specifications for modification of existing structures for accessibility by individuals with disabilities as appropriate.
- Serve as a resource to supervisors, employees, and applicants in all matters concerning individuals with disabilities and covered veterans.
- Train company supervisors and managers concerning the responsibilities of a Federal contractor under Section 503 of the Rehabilitation Act of 1973 and 38 USC 4212 of the Vietnam Era Veterans Readjustment Assistance Act of 1974.

C. TRAINING AND EDUCATIONAL OPPORTUNITIES

Oklahoma Panhandle State University encourages the pursuit of opportunities for educational and professional development beneficial to the company and to the employee.

Reasonable accommodations are made for employees with disabilities to enable them to participate in job-related training and career development.

COMPLAINTS

It is company policy to encourage and facilitate the resolution of employee complaints and problems in a prompt and equitable manner. Employees with disabilities or covered veterans are encouraged to discuss their problems and/or complaints informally with their supervisor, other line manager, or the company EEO Officer.

No disclosure of employee contacts and informal counseling sessions is made without the employee's consent except where necessary in the treatment of the employee or when required by law.

If the complaint cannot be resolved through informal discussions, the employee may request formal review and complaint resolution.

An applicant for employment or any employee of Oklahoma Panhandle State University who feels he or she has been discriminated against, and who is an individual with disabilities or is a covered veteran, is encouraged to contact the Personnel Office or any member of management to seek assistance and direction. Every effort will be made to resolve the problem in a fair and concerned manner.

ACCOMMODATIONS

A. GENERAL ACCOMMODATIONS

Oklahoma Panhandle State University attempts to make accommodations to the physical and mental impairments of employees or applicants with disabilities when such accommodations are reasonable in terms of the conduct of business.

In determining the extent of Oklahoma Panhandle State University's accommodation obligations, the following factors, among others, are considered: (1) business necessity and (2) financial cost and expenses. "Business necessity" includes reasonable consideration of production, safety, and efficiency in the operation of company business.

When an employee is unable to perform the essential duties of a specific position because of a mental or physical disability, efforts are made to allow the employee to continue to work through reasonable accommodation.

Accommodations for disabled employees may involve a change in work schedule, work place, or job structure to assist in the performance of their essential job duties. Accommodations may include, but are not limited to, the removal of architecture barriers, the purchase of assisting devices, and the acquisition of interpreter services for hearing impaired employees

The Accommodations Review Committee provides a forum for resolving accommodation-related problems when an agreement between supervisor and employee or applicant cannot be reached. The EEO Officer chairs this committee. The Accommodations Review Committee is convened by the EEO Officer at the request of line management or at the request of the individual with disabilities. The Accommodations Review Committee provides consistency on what constitutes reasonable accommodation in contested cases.

The company conducts a medical evaluation and recommends appropriate accommodations to permit an employee to continue to work when an employee becomes or is believed to have become disabled. Management determines work restrictions made necessary by the employee's or prospective employee's disability. Supervisors should be sufficiently aware of their employee's work habits to be able to identify behavior or job performance that has been adversely affected by physical, mental, or emotional problems. When those circumstances exist, supervisors may require an employee to be examined by a proper medical authority. A supervisor who regards an employee as having a physical or mental impairment will refer that employee for medical evaluation and recommendation of any needed accommodation. The supervisor will discuss needed accommodation with the disabled individual and the EEO Officer.

B. SPECIFIC ACCOMMODATIONS

Oklahoma Panhandle State University continues to work with employees and supervisors who are in need of accommodations and guidelines in order to complete their responsibilities.

C. WAIVERS OF ADVERTISING

All requests to waive advertising for specific positions are submitted and forwarded to the EEO Officer for screening and for recommendation. Such exceptions must have the President's approval after review. A memorandum, from the department head through the EEO Officer, justifying the waiver requirements, must accompany the request.

INTERNAL COMPLIANCE REVIEW

Internal compliance reviews are internal audits developed to review and evaluate those specific requirements pertaining to the development of the company's policy on Affirmative Action and Equal Employment Opportunity and on the employment and advancement of qualified individuals with disabilities and covered veterans.

Periodic internal compliance reviews ensure implementation of the Affirmative Action Program for individuals with disabilities and covered veterans.

AUDIT OF THE IMPLEMENTATION OF THE DISABLED AND VETERANS AAP

At least quarterly, the EEO Officer will review company personnel actions specifically to monitor how our employment actions are being carried out with reference to the employment, advancement and general employment welfare of the Disabled and Covered Veterans applicants and employees.

If and when discrepancies are found, the EEO Officer will analyze the problem and formulate appropriate corrective actions and ensure they are implemented.

HARASSMENT POLICY

To ensure that harassment of the Disabled and of Covered Veterans does not take place in our workforce, we have issued a Harassment Policy that is applicable to all employees and non-employees having associations with our company. We insist that all incidents of harassment be reported to the Human Resources Department or other members of management so that an investigation of the allegations can be initiated immediately and, as deemed appropriate from the results of the investigation, appropriate corrective actions taken. All forms of harassment are strictly prohibited and violations of this policy will be dealt with appropriately.

LIST OF RECORDS THAT MUST BE MAINTAINED TO SUPPORT
COMPANY EMPLOYMENT DECISIONS. SEPARATE FILES SHOULD BE
MAINTAINED FOR EACH SUBJECT.

- EEO-1 Report *
- Current Vets-100 Report *
- Purchase Order Example *
- Certificate of Compliance
- Minority Status Identifications Request
- Corporate Minutes Concerning EEO/AA *
- Samples of Employment Advertisements *
- Employment Application *
- EEO Voluntary Information Questionnaire
- Anti Harassment Policy
- Applicant Flow / Employment Action Forms
- Company Brochure / Handbook / Publications *
- Training *
- Verification of AAP Notification
- Recruitment Sources *
- Position Posting Information *
- Accommodations

* To be furnished by client

EEO-1 REPORT

CURRENT VETS-100 REPORT

PURCHASE ORDER COPY ONLY

Oklahoma Panhandle State University
P.O. Box 430
Goodwell, OK 73939

Certification of Compliance

It is hereby agreed that the seller, contractor or subcontractor executing this certificate will comply with the requirements herein regarding each agreement and purchase order presently existing or which may be entered into hereafter between the seller, contractor or subcontractor and Oklahoma Panhandle State University. Incorporated by reference in this agreement are all the requirements imposed by Executive Order 11246, as amended, Section 202, Paragraph 1 through 7; Section 503 of the Rehabilitation Act of 1973; 38 USC 4212 of the Vietnam Era Veterans Readjustment Assistance Act of 1974, Executive Order 11625 (Utilization of Minority Business Enterprises), and all implementing regulations including the obligation to submit the EEO-100 and Vets-100 reports. Participants further agree that they do not and will not maintain any facilities provided for employees in a segregated manner or permit employees to perform their services at any location where segregated facilities are maintained.

DATED: _____

AGREED TO AND CERTIFIED BY: Contractor _____
(Company Name)

By _____
(Signature)

(Title)

Oklahoma Panhandle State University
P.O. Box 430
Goodwell, OK 73939

MINORITY STATUS IDENTIFICATION REQUEST

In keeping with our obligations under Executive Order 11625, as well in response to our corporate determination to foster the development of minority businesses, it is necessary to request the following information:

1. Are you a minority business enterprise, i.e., a business at least 50 percent of which is owned by a minority group member, or in the case of a publicly owned business, at least 51 percent of the stock of which is owned by a minority group member? For purposes of this inquiry, minority group members are Black (not of Hispanic origin), Asian or Pacific Islander, Hispanic and American Indian.
2. If you are a minority business, of what minority group are you a member?
3. Has your minority business status been certified?
4. If you are certified as a minority business, who or what agency granted the certification? Please submit a copy of your certification to our Purchasing Manager.
5. Are you a female owned business enterprise, i.e., a business at least 50 percent of which is owned by a woman, or in the case of a publicly owned business, at least 51 percent of the stock is owned by a female?

Your cooperation is appreciated.

Sincerely,

CORPORATE MINUTES CONCERNING EEO/AA MATTERS

CURRENT EMPLOYMENT ADVERTISEMENTS WITH EEO TAGLINE

EMPLOYMENT APPLICATION

MEMORANDUM FOR: Applicants for Employment
FROM: Human Resources Dept.
SUBJECT: Request for EEO Information

This employer is subject to certain governmental record keeping and reporting requirements for the administration of civil rights laws and regulations. In order to comply with these laws, this employer invites employees to **VOLUNTARILY** self-identify their race or ethnicity. Submission of this information is voluntary and refusal to provide it will not subject you to any adverse treatment. The information obtained will be **CONFIDENTIAL** and may only be used in accordance with the provisions of applicable laws, executive orders, and regulations, including those that require the information to be summarized and reported to the federal government for civil rights enforcement. When reported, data will not identify any specific individual.

Name: _____ Job Applied for: _____

I decline this opportunity to respond to the questions listed below: _____

Male Female

Military service:

Vietnam Era Veteran: Served on active duty for more than 180 days between August 5, 1964 and May 7, 1975.

Other Veteran - See attached list.

Race/Ethnicity - Please choose one of the following:

American Indian or Alaskan Native: A person having origins in any of the original peoples of North, Central and South America and who maintains tribal affiliation or community attachment.

Asian: A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.

Black or African American: A person having origins in any of the black racial groups of Africa.

Hispanic or Latino: A person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin regardless of race.

Native Hawaiian or Other Pacific Islander: (Not Hispanic or Latino) a person having origins in any of the peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

White: A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.

Two or More Races: All persons who identify with more than one of the five races identified above.

Signature: _____ Date: _____

MEMORANDUM FOR: Employees
FROM: Human Resources Dept.
SUBJECT: Request for EEO Information

This employer is subject to certain governmental record keeping and reporting requirements for the administration of civil rights laws and regulations. In order to comply with these laws, this employer invites employees to **VOLUNTARILY** self-identify their race or ethnicity. Submission of this information is voluntary and refusal to provide it will not subject you to any adverse treatment. The information obtained will be **CONFIDENTIAL** and away from your employment application. Exceptions to the confidentiality issue are the following established by the regulations: (1) Supervisors and managers may be informed of restrictions on the work or duties of disabled individuals, regarding necessary accommodations. (2) First aid and safety personnel may be informed, when and to what extent appropriate, if the condition might require emergency treatment, (3) Government officials investigating compliance with the Acts shall be informed. If you are a Vietnam Era Veteran or disabled (including special disabled veterans) we would like to include you under our Affirmative Action Program. You may inform us of your desire to benefit under the program at this time and/or at any time in the future. It would assist us if you tell us about any special methods, skills and procedures, which qualify you for positions that you might not otherwise be able to do because of your disability, so that you will be considered for positions of that kind.

Name: _____ Job Applied for: _____

Male Female

Military service:

- Vietnam Era Veteran:** Served on active duty for more than 180 days between August 5, 1964 and May 7, 1975.
- Other Veteran** - See attached list.

Race/Ethnicity - Please choose one of the following:

- American Indian or Alaskan Native:** A person having origins in any of the original peoples of North, Central and South America and who maintains tribal affiliation or community attachment.
- Asian:** A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
- Black or African American:** A person having origins in any of the black racial groups of Africa.
- Hispanic or Latino:** A person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin regardless of race.
- Native Hawaiian or Other Pacific Islander:** (Not Hispanic or Latino) a person having origins in any of the peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
- White:** A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.
- Two or More Races:** All persons who identify with more than one of the five races identified above.

Signature: _____ Date: _____

ANTI-HARASSMENT POLICY

It is the policy of Oklahoma Panhandle State University to conduct its operations in an environment free from sexual harassment. Specific acts prohibited include, but are not limited to, offensive sexual advances, verbal abuse of a sexual nature, graphic verbal comments about an individual's body, and display in the work place of sexually suggestive graffiti, objects, or pictures. The policy extends to non-employees, such as vendors, personnel, sales representatives, and job applicants.

Oklahoma Panhandle State University encourages and urges all employees to promptly report any incident of sexual harassment to the Employee Relations Department. The Employee Relations Department should also be contacted in the event any employee has questions concerning the Sexual Harassment Policy or wishes further explanation of specific conduct, which may be in violation of this policy. If, for any reason, an employee is uncomfortable making a report to the Employee Relations Department, the employee should feel free, at all times, to make a report directly to the General Manager of the facility or any member of management.

Oklahoma Panhandle State University's policy prohibits any employee from taking any adverse action against another employee based upon the employee's reporting of an incident of sexual harassment.

Violation of Oklahoma Panhandle State University's Sexual Harassment Policy will not be tolerated and will result in disciplinary action up to and including termination of employment.

APPLICANT FLOW LOG FORMS / EMPLOYMENT ACTION FORMS

COMPANY BROCHURE / HANDBOOK / PUBLICATIONS

TRAINING

VERIFICATION OF AAP NOTIFICATION

(Read and Sign & Then Return to Your Supervisor)

This is to verify that I have been informed that Oklahoma Panhandle State University has an Affirmative Action Program and that a copy is available for me to review at the company personnel office. I understand that the principles promulgated by the program are designed to ensure equal employment opportunity to all applicants and employees. The company president, managers and supervisors are committed to carry out the terms of this program to avoid acts of discrimination against applicants and employees because of their race, color, gender, national origin, religion, disability or veterans status and to foster a positive atmosphere of fairness in the administration of all employment actions.

Signed: _____

Position: _____

Date: _____

Supervisor's Signature & Date: _____

RECRUITMENT SOURCES

Note: Remember to recruit with state employment services or america's job banks.

POSITION POSTING INFORMATION

MEMORANDUM FOR: **Cheryl Ashpaugh, EEO Officer**
FROM: RPL Management Resources, Inc.
SUBJECT: Actions to be Taken Prior to the OFCCP Audit

1. Maintenance of records is vital to defending your position should be called upon to do so. This is imperative for EEO and Affirmative Action records. We suggest having a filing system that is organized according to the tabs in the AAP so that actions taken can be maintained easily. This would make replying to an audit request for information easier to respond in a timely manner.
2. I-9s must be kept for at least three (3) years from the date of employment or for one (1) year after the employee leaves the job. However, we suggest they be kept longer than that unless there is a problem with space that makes it necessary to dispose of the I-9s after that 3-year period.
3. Send a memo to all employees inviting those who are disabled or disabled veterans to identify themselves, if they have not already done so, they may take advantage of the benefits available to them through the Affirmative Action Program.
4. Call RPL Management Resources, Inc. for a pre-audit conference: (918) 280-1519

MEMORANDUM FOR: **Oklahoma Panhandle State University**
FROM: RPL Management Resources, Inc.
SUBJECT: Project Closure Document

We have reviewed the EEO documentation submitted by **Oklahoma Panhandle State University** and made the following comments and recommendations:

1. In order to obtain EEO data needed to complete various federal reporting requirements, we have prepared two survey forms called "*Request for EEO Information*" for Applicants and Employees that is to be completed by both. When these forms have been completed, they are to be kept confidential and separated from the personnel jackets and employment application forms. The "*Request for EEO Information*" forms are found in Section 12, TOC "J" of your AAP book.
2. The *Disadvantaged Business Entrepreneur Questionnaire* is found in the Appendix in Section 12, TOC "F". This letter is to be sent to companies with whom you do business. Responses are to be maintained and the data compiled.
3. A list of minority and female referral sources should be maintained and should include:
 - Vo-Tech, Non-traditional Female Occupational Training Program
 - Urgan League
 - Rehabilitative Services (Tulsa Speech & Hearing Assoc)
 - State Employment Service or <http://www.Careeronestop.org>
 - Goodwill Agency
 - Local College or University
4. *Certification of Compliance* survey certificate should be sent to all vendors with whom you do business to ensure that they are in compliance with the laws covering them. This survey certificate can be found under Section 12, TOC "E".
5. A sample form and explanation for listing *Accommodations* made for employees is found in Section 12, TOC "R".
6. **Oklahoma Panhandle State University** and all subcontractors must submit *EEO-1 Reports* and the *Vets-100 Report* annually.

IN THE EVENT OF AN AUDIT, CALL US IMMEDIATELY TO PREPARE THE COMPANY TO RESPOND TO THE AGENCY REQUEST

GLOSSARY OF TERMS
41 CFR 60-1.3, 60-250.2, AND 60-742.8 DEFINITIONS

"Act": the Rehabilitation Act of 1973, Pub. L. 93-112, as amended by the Rehabilitation Act Amendments of 1974, Pub. L. 93-516, and Vietnam Era Veterans Readjustment Assistance Act, Pub. L. 92-540 of 1974, as amended.

"Administering Agency": any department, agency and establishment in the executive branch of the Government, including any wholly-owned Government corporation, which administers a program involving federally assisted construction contracts.

"Affirmative Action Clause": the contract provisions set forth in 60-741.4 and 60-250.4.

"Agency": any contracting or any administering agency of the Government.

"Assistant Secretary": the Assistant Secretary of Labor for Employment Standards or his/her designee.

"Construction Work": the construction, rehabilitation, alteration, conversion, extension, demolition or repair of buildings, highways, or other changes or improvements to real property, including facilities providing utility services. The term also includes the supervision, inspection, and other on-site functions incidental to the actual construction.

"Contract": any Government contract.

"Contracting Agency": any department, agency, establishment, or instrumentality in the executive branch of the Government, including any wholly-owned Government corporation, which enters into contracts.

"Contractor": unless otherwise indicated, a prime contractor or subcontractor.

"Director": the Director, Office of Federal Contract Compliance Programs (OFCCP), U.S. Department of Labor or any person to whom he delegates authority under the regulation of this chapter.

"Equal Opportunity Clause": the contract provisions set forth in 60-1.4(a) or (b), as appropriate.

"Government": the government of the United States of America.

"Government Contract": any agreement or modification thereof between any contracting agency and any person for the furnishing of supplies or services or for the use of real or personal property, including lease arrangements. The term "services", as used in this section, includes, but is not limited to the following services: utility, construction, transportation, research, insurance, and fund depository. The term "Government Contract" does not include (1) agreements in which the parties stand in the relationship of employer and employee, and (2) federally assisted construction contracts.

"Disabled Individual": any person who (1) has a physical or mental impairment which substantially limits one or more of such person's major life activities, (2) has a record of such impairment or (3) is regarded as having such an impairment.

"Substantially Limits" means the degree to which the disability affects employability. An individual with disabilities who is likely to experience difficulty in securing, retaining, or advancing in employment because of a disability would be considered "substantially limited."

"Major Life Activities" may be considered to include communication, ambulation, self-care, socialization, education, vocational training, transportation, adapting to housing, and, of course, employment. Primary attention, however, is given to those life activities that affect employment.

"Has a Record of Such an Impairment" means that an individual may be completely recovered from a previous physical or mental impairment.

"Is Regarded as Having an Impairment" refers to persons who are perceived as having a disability, whether the impairment exists or not.

"Minority Group": as used here shall include Black (not of Hispanic Origin), Asian or Pacific Islander, Hispanic, American Indian, and where appropriate, female employees and prospective employees.

"Modification": any alteration in the terms and conditions of a contract, including supplemental agreements, amendments, and extensions.

"Order", "Executive Order", or "Executive Order 11246": parts II, III, and IV of the Executive Order 11246 dated September 24, 1965, and any Executive Order amending such order and any other Executive Order superseding such order.

"Person": any natural person, corporation, partnership, unincorporated association, state or local government, and any agency, instrumentality, or subdivision of such a government.

"Prime Contractor": any person holding a contract and, for the purposes of Subpart B of this part, any person who held a contract subject to the order.

"Promotion": any personnel action resulting in movement to a position affording higher pay, or greater rank and/or provides for greater skill or responsibility or the opportunity to attain such skill or responsibility. The company reserves the right to determine what is or is not a promotion.

"Qualified Disabled Individual": a disabled individual as defined in 60-741.2 who, with or without reasonable accommodation, can perform the essential functions of the employment position that such individual holds or desires.

"Recruiting and Training Agency": any person who refers workers to any contractor or subcontractor or who provides or supervises apprenticeship or training for employment by any contractor or subcontractor.

"Rules, Regulations, and Relevant Orders of the Secretary of Labor" used in paragraph (4) of the equal opportunity clause and paragraph (b) of the affirmative action clause means rules, regulations, and relevant orders of the Secretary of Labor or his or her designee issued pursuant to the Order or Act.

"Secretary": the Secretary of Labor, U.S. Department of Labor.

"Subcontract": any agreement or arrangement between a contractor and any person (in which the parties do not stand in the relationship of an employer and an employee):

(1) For the furnishing of supplies or services or for the use of real or personal property, including lease arrangements, which, in whole or in part, is necessary to the performance of any one or more contracts; or

(2) Under which any portion of the contractor's obligation under any one or more contracts is performed, undertaken or assumed.

"Subcontractor": any person holding a subcontract and, for the purposes of Subpart B of this part, any person who has held a subcontract subject to the order. The term "First-tier subcontractor" refers to a subcontractor holding a subcontract with a prime contractor.

"United States": as used herein shall include the several states, the District of Columbia, the Commonwealth of Puerto Rico, the Panama Canal Zone, and the Possessions of the United States of America.

"Veteran of the Vietnam Era": a person (1) who served on active duty for a period of more than 180 days, any part of which occurred between August 5, 1964 and May 7, 1975, and was discharged or released there from with other than a dishonorable discharge, or (2) was discharged or released from active duty for a service-connected disability if any part of such active duty was performed between August 5, 1964 and May 7, 1975.

A **"Disabled Veteran"** means a person who is entitled to disability compensation under laws administered by the Veterans Administration for disability rated at 30 percent or more, or a person whose discharge or release from active duty was for a disability incurred or aggravated in the line of duty.

"Qualified Disabled Veteran" means a disabled person as defined in 41 CFR 60-250.2 that is capable of performing a particular job, with reasonable accommodation to his or her disability.