

Affirmative Action Plan for Qualified Individuals with Disabilities and Qualified Protected Veterans

Plan Effective Date: January 20, 2024

Plan Expiration Date: January 19, 2025

EEO Administrator: Mary Zabriskie
Director of Equal Opportunity, Access, and Title IX Coordination

Prepared By: Mindy Kinnaman
Assistant Director of Equal Opportunity, Access, and Title IX
Coordination

Establishment's Name: Southern Illinois University Edwardsville

Establishment's Address: 70 Hairpin Drive
Edwardsville, IL 62026

I. INTRODUCTION

This Section of the Affirmative Action Plan is designed to meet requirements that Southern Illinois University Edwardsville create an Affirmative Action Plan for individuals with disabilities and covered veterans as required by Federal and state law.

II. POLICY STATEMENT ON DISABILITY AND VETERAN STATUS

Under the Affirmative Action obligations imposed by Section 503 of the Rehabilitation Act of 1973 and Vietnam Era Veterans' Readjustment Assistance Act of 1974 (VEVRAA), as amended, it is the policy of the University to provide Equal Employment Opportunities and to advance in employment qualified individuals with a disability as well as qualified protected veterans. This policy is designed to employ and advance all qualified individuals with a disability and qualified protected veterans at all levels of employment, including the executive level. The University's policy of providing Equal Employment Opportunities to qualified persons with a disability and qualified protected veterans shall apply to all employment practices, including, but not limited to: upgrading, demotion or transfer, tenure or promotion, layoff or termination, rates of pay or other forms of compensation, and selection for training. The University attempts to comply with all of the rules, regulations, and relevant orders of the Secretary of Labor and the Office of Federal Contract Compliance Programs (OFCCP), issued pursuant to Section 503 of the 1973 Rehabilitation Act and the 1974 Vietnam Era Veterans' Readjustment Assistance Act, as amended.

The University's Affirmative Action Program for qualified persons with a disability and qualified protected veterans is reviewed and updated annually. If there are any significant changes in the University's procedure, or if employee rights or benefits are modified as a result of an annual updating, these changes are communicated to employees and applicants for employment.

On a strictly voluntary basis, the University invites all qualified protected veterans who are either employees or applicants for employment and employees who have a disability and who wish to benefit under the University's Affirmative Action Program to identify themselves to either their immediate supervisor or to the Office of Equal Opportunity, Access, and Title IX Coordination. Any individual who identifies themselves will not be subjected to any form of harassment or retaliation based on their status or self-identification. Further, this self-identification will be kept confidential.

Employees and applicants shall not be subjected to harassment, intimidation, threats, coercion, or discrimination because they have engaged in or may engage in any of the following activities: (1) filing a complaint; (2) assisting or participating in an investigation, compliance review, hearing, or any other activity related to the administration of Section 503 of the Rehabilitation Act of 1973, as amended; VEVRAA, as amended; or any other Federal, state, or local law requiring equal opportunity for disabled persons or qualified protected veterans; (3) opposing any act or practice made unlawful by Section 503 of the Rehabilitation Act of 1973, VEVRAA or its implementing regulations in this part, or any other Federal, state or local law requiring equal opportunity for disabled persons or for qualified protected veterans; or (4) exercising any other right protected by Section 503 of the Rehabilitation Act of 1973 or its implementing regulations in this part, or any other right protected by VEVRAA or its implementing regulations in this part.

The University reviews personnel activities to determine whether present practices give careful, thorough, and systematic consideration of the qualifications of individuals with disabilities, disabled veterans, and qualified protected veterans for employment opportunities filled either by hiring or promotion and for all training opportunities offered or available.

SIUE will make good faith efforts to analyze requests (written or verbal) for an accommodation and enter into an interactive process with the requester, the requester's supervisor, the University's ADA Coordinator, and Human Resources to determine whether a reasonable accommodation exists and is appropriate, or unless it is demonstrated that an accommodation would impose an undue hardship on the University.

University employees, students, supervisors, applicants for employment, and others needing information or seeking assistance regarding this policy, accommodations, or complaint procedures may contact the University's ADA Coordinator in the Office of Equal Opportunity, Access, and Title IX Coordination, Room 3310, Rendleman Hall, 618.650.2333. Students seeking assistance or information regarding disabilities services or programs can contact ACCESS. Their website is located at <https://www.siu.edu/access/>.

III. REVIEW OF PERSONNEL PROCESSES

Southern Illinois University Edwardsville reviews annually its personnel processes to determine whether its present procedures ensure careful, thorough, and systematic consideration of the qualifications of known qualified individuals with disabilities and qualified protected veterans. This review covers all procedures related to the filling of job vacancies, either by hire or promotion, as well as all training opportunities offered or made available to employees.

In determining the qualifications of veterans, Southern Illinois University Edwardsville limits its consideration of a qualified protected veteran's military record, including discharge papers, to only that portion of the record which is relevant to the specific job qualifications for which the veteran is being considered.

Based upon Southern Illinois University Edwardsville's review of its personnel processes, Southern Illinois University Edwardsville will modify the personnel processes when necessary and will include the development of new procedures in this Affirmative Action Program to ensure Equal Employment Opportunity.

IV. PHYSICAL AND MENTAL QUALIFICATIONS

The physical and mental job qualifications of all jobs have been reviewed and are reviewed as new ones are established to ensure that, to the extent that such qualification requirements tend to screen out qualified individuals with disabilities and qualified disabled veterans, job qualifications are consistent with business necessity and the same performance of the job.

No qualification requirements were identified that had a screening effect. All job qualification requirements were found to be job-related and consistent with business necessity and safety. Southern Illinois University Edwardsville will continue to review physical and mental job qualification requirements whenever a job is vacated and the University intends to fill it through hiring, promotion, or transfer and will conduct a qualifications review whenever job duties change.

If at any time Southern Illinois University Edwardsville should inquire into an employee's physical or mental condition or should conduct a medical examination prior to a change in employment status, Southern Illinois University Edwardsville affirms that information obtained as a result of the inquiry will be kept confidential, except as otherwise provided for in Section 503 of the Rehabilitation of 1973 regulations. The results of the examination or inquiry will be used in accordance with the aforementioned regulations:

1. Supervisors, managers, and University officials may be informed regarding restrictions and accommodations for the work or duties of individuals with a disability.
2. Employees familiar with first aid may be informed where and to the extent appropriate if an individual with a disability might require emergency treatment.
3. OFCCP officials investigating compliance with either the 1973 Rehabilitation Act or VEVRAA, as amended.

V. REASONABLE ACCOMMODATION TO PHYSICAL AND MENTAL LIMITATIONS

It is the University's policy to make a reasonable accommodation to the physical and mental limitations of any employee with a disability and qualified applicants with a disability unless their accommodation imposes an undue hardship on the University's business (41 CFR – 741.44(d); 250-44(d)). In determining the extend of the University's accommodation obligations, the following factors, among others, are considered:

1. Business necessity; and
2. Financial cost and expense.

Each applicant or employee is dealt with on an individual basis. Reasonable accommodations are made whenever possible, and ongoing efforts include revision of facilities to make them accessible. The University makes every effort to provide suitable employment for those employees who become disabled while employed by us.

Some examples of reasonable accommodations include:

- Job restructuring;
- Modifying work schedules;
- Reassignment to a vacant position;
- Acquiring or modifying equipment or devices;
- Adjusting or modifying examinations, training materials, or policies; and
- Providing qualified readers or interpreters.

The University is not required to lower quality or quantity standards to make an accommodation. Nor is the University obligated to provide personal use items, such as glasses or hearing aids, as accommodations.

VI. HARASSMENT PREVENTION PROCEDURES

Employees of and applicants to Southern Illinois University Edwardsville will not be subject to harassment, intimidation, threats, coercion, or discrimination because they have engaged or may engage in filing a complaint; assisting in a review, investigation, or hearing; or have otherwise sought to obtain their legal rights related to any Federal, state, or local law regarding EEO for qualified individuals with disabilities or qualified protected veterans. Any employees or applicants who feel that they have been subject to harassment, intimidation, threats, coercion, or discrimination because of their disability or status as a qualified protected veteran should contact the Office of Institutional Compliance for assistance. This policy is posted for employees and applicants to view.

VII. AUDIT AND REPORTING SYSTEMS

The University has designed and implemented audit and reporting systems that:

1. Measure the effectiveness of the University's programs;
2. Document personnel activities;
3. Identify problem areas where remedial action is needed; and
4. Determine the degree to which Southern Illinois University Edwardsville's AAP goals and objectives have been attained.

The following activities are reviewed at least annually to ensure freedom from stereotyping qualified individuals with disabilities and qualified protected veterans in any manner, including that which may limit their access to any job for which they are qualified:

1. Recruitment, advertising, and job application procedures;
2. Hiring, promotion, upgrading, layoff, recall from layoff;
3. Rates of pay and any other forms of compensation, including fringe benefits;
4. Job assignments, job classifications, job descriptions, and seniority lists;
5. Sick leave, leaves of absence, or any other leave;
6. Training, attendance at professional meetings and conferences; and
7. Any other term, condition, or privilege of employment.

Southern Illinois University Edwardsville's audit system includes periodic reports documenting Southern Illinois University Edwardsville's efforts to achieve its EEO/AAP responsibilities. Managers and supervisors are asked to report any current or foreseeable EEO problem areas and are asked to outline their suggestions/recommendations for solutions. During the reporting, the following occurs:

1. The Office of Equal Opportunity, Access, and Title IX Coordination will discuss any problems relating to significant rejection ratios, EEO charges, etc., with management; and

2. The Office of Equal Opportunity, Access, and Title IX Coordination will report the status of the University's AAP goals and objectives to management. The Office of Equal Opportunity, Access, and Title IX Coordination will recommend remedial actions for the effective implementation of the AAP.

VIII. RESPONSIBILITIES AND OBLIGATIONS

A. Responsibility for Implementing Equal Opportunity Policy

The Chancellor assumes final responsibility for implementation of the Equal Opportunity Policy. However, the Office of Equal Opportunity, Access, and Title IX Coordination is responsible for the continuing development, implementation, and monitoring of the policy. This includes:

1. Discussing and explaining provisions of the plan with top administration;
2. Designing and implementing auditing and monitoring systems that:
 - a. Measure the effectiveness of affirmative action for veterans and individuals with disabilities;
 - b. Indicate need for remedial action; and
 - c. Determine the degree to which the University's goals and objectives are met.
3. Serving as a liaison between the University and compliance agencies.
4. Serving as a liaison between the University and veterans' organizations and community action groups concerned with employment opportunities for individuals with disabilities; and
5. Reviewing qualifications of employees with disabilities, disabled veterans, and qualified protected veterans to ensure that they are given full opportunities for transfers and promotions.

B. Development of Programs

In establishing this section of the Affirmative Action Plan, the following guidelines apply:

1. Reviewing and modifying job qualification requirements when necessary;
2. Analyzing the selection process to ensure that employees and/or applicants with disabilities, disabled veterans, and qualified protected veterans have access to employment opportunities;
3. Training appropriate personnel involved in the recruitment, screening, selection, promotion, discipline, and other related personnel functions in affirmative action and equal opportunity guidelines.

4. Advising recruiting units of the Affirmative Action Plan and soliciting assistance in recruitment and placement of qualified individuals with disabilities, disabled veterans, and qualified protected veterans; and

5. Including qualified employees with disabilities, disabled veterans, and qualified protected veterans on the Human Resources staff.

IX. DETERMINATION OF DISABILITY STATUS

In determining an individual's disability status, the University may:

1. Require an applicant or employee to provide medical documentation of any impairment or, in the alternative, require the applicant or employee to undergo a medical examination at the University's expense.
2. Require a disabled veteran to submit documentation from the Veterans Administration or military service or a release indicating their disability status. Such documentation should be updated as required.
3. Make determination of a disability until 41 CFR 60-250 and CFR 60-741 for affirmative action purposes only and is not used to exclude or otherwise limit employment opportunities of qualified veterans and individuals with disabilities.