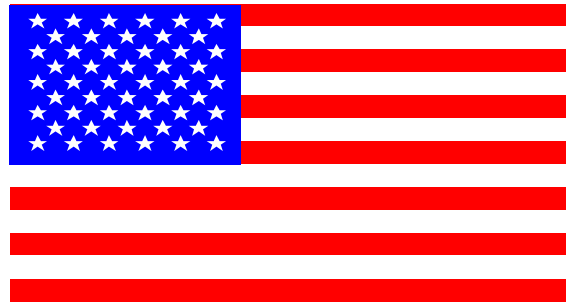




AFFIRMATIVE ACTION PLAN



FOR VETERANS AND INDIVIDUALS WITH DISABILITIES

Office of Diversity and Equal Opportunity
December 2005

**University of South Florida
Office of Diversity and Equal Opportunity**

**2005 Affirmative Action Plan for Veterans
and Individuals with Disabilities**

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I) Policies and Procedures

- 1 – University ADA Policy - Link to General Counsel Web site
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- 2 – Diversity and Equal Opportunity Policy - Link to General Counsel Website
http://usfweb.usf.edu/usfgc/gc_pp/genadm/gc007.htm
- 3 – University Complaint Procedure - Link to DEO website
<http://usfweb.usf.edu/proced/ea/complaint.htm>
- 4 – University ADA Procedure for Telephone Processes -Link to COMPASS Website
<http://compass.custhelp.com/>
- 5 – Human Resources Recruitment Forms- Link to Compass Website
[Recruitment Forms](#)
- 6 – Reasonable Accommodation Procedure: Public Events/Services- Link to Compass Website
<http://compass.custhelp.com/>

II) Selected Media, Services and Recruitment Sources

1 – National Advertising Sources

<http://www.rmit.usf.edu/EOA/home-page/rec2nati.htm>

<http://www.rmit.usf.edu/EOA/home-page/rec1sour.htm>

2 – Disability Constituency Advertising Sources

http://usfweb.usf.edu/ea/ada_advertising.asp

3 – Regional Organizations/Associations for Persons with Disabilities

http://usfweb.usf.edu/ea/ada_org.asp

4 – DEO Web Site for Persons with Disabilities

<http://usfweb.usf.edu/ea/disability.asp>

5 – USF Office of Student Disability Services Website -

<http://www.sa.usf.edu/sds/>

6 – USF Office of Veteran Services

<http://www.usf.edu/vetserve/>

III) Equipment and Assistive Devices

1– Adaptive Equipment

http://usfweb.usf.edu/ea/ada_equipment.asp

2 –Telephone Devices for the Hearing Impaired (TDD/TTY)

http://usfweb.usf.edu/ea/tdd_locations.asp

EXECUTIVE SUMMARY

This Affirmative Action Plan complies with the Office of Federal Contract Compliance Programs, Affirmative Action Obligations of Contractors and Subcontractors for Disabled Veterans and Veterans of the Vietnam Era, CFR 41 Chapter 60, section 60-250 and Affirmative Action and Nondiscrimination Obligations of Contractors and Subcontractors Regarding Individuals With Disabilities, CFR 41 Chapter 60 section 60-741.

This Affirmative Action Plan is a reaffirmation of the University of South Florida's commitment to take affirmative actions to employ, advance in employment, and otherwise treat qualified veterans and persons with disabilities equitably. It is predicated on the belief that affirmative action is not just a legal obligation but also a social obligation and an economic necessity.

2004 Progress Report

1. Completed major accessibility renovations to several buildings.
2. The University achieved 7 (38.8%) of the eighteen objectives of its 1997 Self-Evaluation Study of Services and Programs Accessibility.
3. The University maintained the number of Special Disabled Veterans¹ in its workforce unchanged at 8 during the period of August 2004 to August 2005.
4. The number of Vietnam Era Veterans² in its workforce decreased from 138 in August 2004 to 121 August 2005.
5. The number of Other Protected Veterans³ in its workforce decreased from 63 in August 2004 to 34 in August 2005.
6. The University served approximately 1,300 (3%) students that have identified themselves as "individuals with disabilities."

¹Special Disabled Veterans= (i) A veteran of the U.S. military, ground, naval or air service who is entitled to compensation under laws administered by the Department of Veteran Affairs for a disability rated at 30 percent or more or rated at 10 or 20 percent in the case of a person who has been determined to have a serious employment handicap or (ii) a person who was discharged or released from active duty because of a service-connected disability.

²Vietnam Era Veterans= A person who (i) served on active duty in the U.S. military, ground, naval or air service for a period of more than 180 days, and who was discharged or released therefrom with other than a

dishonorable discharge, if any part of such active duty was performed: (A) in the Republic of Vietnam between February 28, 1961 and May 7, 1975 or between August 5, 1964 and May 7 1975, or (B) between August 5, 1964 and May 7, 1975 in any other location.

³Other Protected Veterans= Veterans who serve on active duty in the U.S. military, ground, naval or air service during a war or in a campaign or expedition for which a campaign badge has been authorized.

Goals and Objectives

To continue ensuring equal opportunity for veterans and individuals with disabilities, the University will:

1. Take affirmative action toward the goals set and the objectives established in its 1995 Transition Plan;
2. Take affirmative action toward the goals set and the objectives established in its 1997 Self-Evaluation Study;
3. Use the recruitment and selection strategies outlined in this Affirmative Action Plan to increase representation of veterans and individuals with disabilities in its workforce;
4. Make good faith efforts to prevent or otherwise combat illegal discrimination through full implementation of the dispute resolution procedures and the DEO Complaint Procedure described in this Plan.

INTRODUCTION

Affirmative action has recently come under intense scrutiny, and misconceptions regarding the intent and practice of affirmative action programs abound. While the implementation of affirmative action has not always been perfect, overall equal opportunity and affirmative action programs for the employment and advancement of veterans and individuals with disabilities have been greatly enhanced since the establishment of the Equal Employment Opportunity Commission and the Office of Federal Contract Compliance Programs.

I) THE CONCEPTS, THE PHILOSOPHY

Equal Opportunity regulations require that educational and employment opportunities be provided regardless of race, color, marital status, sex, religion, national origin, disability, age, and veteran status. Affirmative action policies ensure equal opportunity by remedying the effects of past discrimination and preventing further discrimination.

Affirmative actions are designed to ensure fair and open competition. The types of affirmative action to be taken depend on the degree of underutilization of members of the protected classes; they include, but are not limited to:

1. Validation of selection criteria;
2. Fair representation of the interests of each group in the recruitment, admission and selection processes;
3. Aggressive recruitment of members of underutilized groups;
4. Elimination of invalid screening and selection devices;
5. Control for biases and prejudices in recruitment, admission and selection;
6. Prevention of favoritism and nepotism;
7. Promotion of diversity of perspectives and experiences;
8. Reasonable accommodation for disabilities;
9. Utilization of alternate selection procedures to remedy identified discrimination;

10. Granting of employment preferences based on veteran status, as provided by Law;
11. Development and implementation of programs designed to facilitate retention of members of the protected classes;
12. Investigation of discrimination complaints; and
13. Establishment of goals designed to assess the effectiveness of equal opportunity programs.

Equal opportunity and affirmative action are intelligent investments in human resources. Equal opportunity is to be provided in all education and employment programs. Affirmative actions are to be taken whenever there is underutilization of members of a protected class.

II) THE POLICY OF THE UNIVERSITY

A) Commitments

The University of South Florida System (USF System) is a diverse community that values and expects respect and fair treatment of all people. The USF System strives to provide a work and study environment for faculty, staff and students that is free from discrimination and harassment on the basis of race, color, marital status, sex, religion, national origin, disability or age, as provided by law. The USF System is also committed to the employment and advancement of qualified veterans with disabilities and veterans of the Vietnam era. (USF Policy 0-007, Rev. 07/07/05).

B) Prohibitions and Protections

Unlawful discrimination, harassment and retaliation are prohibited at the University. Behavior that constitutes unlawful discrimination, harassment or retaliation is unacceptable.

The Diversity and Equal Opportunity Office (DEO) is responsible for investigating discrimination complaints/allegations. A full copy of the procedures used to conduct any investigation is available in the Diversity and Equal Opportunity Office, ADM 172, (813) 974-4373.

C) Implementation

In order to facilitate the administration and full implementation of the clauses of its Nondiscrimination Policy that relate to veterans and individuals with disabilities, the University has developed:

- a) An ADA Policy;
- b) Guidelines for resolution of discrimination complaints;
- c) Procedures for making reasonable accommodations for students, and employees with disabilities.

CHAPTER 1 AFFIRMATIVE ACTION STRUCTURE AND ACHIEVEMENTS

I) THE PLAN AND ITS UPDATES

The University of South Florida was one of the first institutions of higher education in the Southeast to adopt an Affirmative Action Plan for Equal Employment. The Plan was approved and promulgated in June 1969. It was the first document of its kind in the Florida State University System. This Plan and its Updates are designed to facilitate achievement of the diversity and equal opportunity goals of the University while complying with Section 503 of the Vocational Rehabilitation Act of 1972, and with 38 U.S.C. Section 4212 of the Vietnam Era Veterans' Readjustment Assistance Act of 1974.

The Plan and its Updates analyze the University's workforce and evaluate its employment practices to identify and remedy the effects of any unlawful mental, physical and organizational obstacles on veterans and individuals with disabilities. The Plan follows legal requirements, in that:

- 1) It demonstrates the necessity for remedies and explains the advantages of the proposed remedy over other alternatives;
- 2) It proposes remedies that are specific, flexible and limited in duration;
- 3) It establishes reasonable relationships between numerical goals and the availability of qualified members of the protected classes;
- 4) It does not unnecessarily "trammel" the rights of non-protected classes; that is, proposed remedies or corrective actions do not constitute absolute barriers to the advancement of non-protected classes;
- 5) It is carefully calibrated to remedy specific situations, it is narrowly tailored, it fosters fair and open competition, and it does not provide for more corrective action than needed.

II) FUNCTIONS OF THE OFFICE OF DIVERSITY AND EQUAL OPPORTUNITY

The Office of Diversity and Equal Opportunity (DEO) works toward the fulfillment of the commitment of the University by facilitating or otherwise ensuring its compliance with regulations pertaining to veterans and

individuals with disabilities. The Office, more specifically, contributes to the following University commitments:

1. Recruitment and retention of a culturally diverse community of scholars;
 2. Enhancement of an environment that increases their understanding of the need to appreciate differences;
 3. Proactively addressing issues that result in a multicultural environment of increased respect and understanding.
- A. The Office works toward making the University of South Florida a discrimination-free and a barrier-free University.
- B. To fulfill its mission, the Office strives toward the following goals:
1. Provide support for the infrastructure of the University in matters pertaining to access of its services and programs to veterans and individuals with disabilities.
 2. Provide leadership in the areas of equal opportunity and affirmative action for veterans and individuals with disabilities.
 3. Develop and maintain relationships with public and private agencies that provide services to veterans and individuals with disabilities.
- C. To achieve its goals the Office has established the following objectives:
1. Implement or otherwise monitor the implementation of University policies pertaining to disability and veterans issues.
 2. Organize and conduct training and awareness sessions for supervisors and employees on the rights and obligations of veterans and persons with disabilities.
 3. Provide general information about services available to veterans and individuals with disabilities.
 4. Consult with supervisors and managers on their duties and responsibilities under laws, rules, and regulations related to veterans and individuals with disabilities.
 5. Consult with Academic Support and Accommodations for Students with Disabilities and Human Resources/ Employee Relations and Employment Services and the Office of the Provost/Academic Affairs on the rights and obligations of veterans and individuals with disabilities.
 6. Resolve complaints based on disability through mediation, investigation or conciliation.
 7. Coordinate the development and implementation of affirmative action plans for veterans and individuals with disabilities.

8. Develop or coordinate development of progress reports and plans required by the University for decision-making.
9. Develop or coordinate development of progress reports and plans required by state and federal regulatory agencies.
10. Oversee the implementation of the University's ADA Transition Plan for physical accessibility.
11. Coordinate the development and implementation of Self-Evaluation Study of Programmatic Accessibility.
12. Implement programs designed to enhance professional development of individuals with disabilities.
13. Establish and maintain partnerships with organizations designed to facilitate the advancement of veterans and individuals with disabilities.
14. Conduct periodic audits of recruitment, selection, promotion, training and evaluation processes to ensure that they comply with regulations pertaining to veterans and individuals with disabilities.

III) EQUAL OPPORTUNITY RESPONSIBILITIES OF USF ADMINISTRATORS

- A. The President is the Chief Equal Opportunity/Affirmative Action Officer of the University. The President has delegated some responsibilities to other campus administrators, as described below.
- B. The Provost has indirect responsibility for the Office of Diversity and Equal Opportunity. The primary duties and responsibilities of the Provost include:
 1. Providing leadership and support in programs designed to ensure equal opportunity for veterans and persons with disabilities.
 2. Promoting the University's commitment to equal opportunity for veterans and persons with disabilities.
 3. Reviewing reports and recommendations submitted by the Associate Vice President for Diversity and Equal Opportunity.
 4. Informing the President of opportunities in, and issues with, programs related to veterans and persons with disabilities.
- C. The Associate Vice President for Diversity and Equal Opportunity reports to the President. The primary duties and responsibilities of the Associate Vice President include:
 1. Informing and advising the President, Provost, the Vice Presidents, and other University officials on equal opportunity/affirmative action issues.

2. Providing technical assistance to the Title IX Committee and the Physical Accessibility Workgroup (PAW).
3. Coordinating the development and the implementation of affirmative action programs pertaining to veterans and persons with disabilities.

D. The DEO staff reports to the Associate Vice President for DEO. The duties and responsibilities of the DEO staff include:

1. Investigating discrimination complaints based on disability.
2. Monitoring the implementation of the University's Americans with Disabilities Act Transition Plan and of the Self-Evaluation Study of Programmatic Accessibility.
3. Monitoring compliance of the various programs of the University with local, state and federal regulations pertaining to veterans and individuals with disabilities.
4. Advocating for affirmative actions for individuals who have veteran status.
5. Ensuring provision of reasonable accommodations for public events organized by the University.
6. Advising and participating as a member of the Physical Accessibility Workgroup (PAW) of the University.

E. The Director of the Academic Support and Accommodations for Student Disabilities reports to the Associate Vice President for Student Affairs. The primary duties and responsibilities of the Director include:

1. Certification of eligibility for reasonable accommodation of academic and non-academic services for University students.
2. Facilitation of academic and non-academic reasonable accommodation requests by University students.
3. Maintenance of confidential documentation and records of students with disabilities.
4. Coordination of services with offices/liaisons of the regional campuses to facilitate reasonable accommodation requests of students.

F. The Coordinators of Human Resources/Employment Services report to the Associate Director for Human Resources/Employment Services. The primary duties and responsibilities of the Coordinators include:

1. Training the University community on the employment requirements of the Americans with Disabilities Act and of the University's ADA Policy.
2. Facilitating the provision of reasonable accommodation requests of applicants and employees.

3. Maintaining confidential documents and records of employees with disabilities.

G. The Physical Accessibility Workgroup (PAW), with membership representing several university offices, reports to the Associate Vice President for DEO and is charged with:

1. Considering issues that impact the University resulting from the Americans with Disabilities Act.
2. Recommending priorities for accessibility renovations and recommending accessibility features in renovations and new construction.
3. Recommending appropriate services that facilitate physical accessibility for students and employees with disabilities.

H. The Vice Presidents and Deans are responsible for:

1. Implementation of the University's Transition Plan and the Self-Evaluation Study within their Division and College.
2. Provision of funding for ADA reasonable accommodation requests of their employees.

I. Directors have direct responsibility for:

1. Implementing or otherwise monitoring the implementation of the Transition Plan and of the Self-Evaluation Study within their respective units.
2. Identifying problem areas and developing appropriate corrective action, in cooperation with the Office of Diversity and Equal Opportunity.
3. Developing and maintaining audit and feedback systems designed to evaluate the effectiveness of their programs.
4. Appointing DEO Liaisons to review applicant pools and the entire hiring process for each new hire for conformance with USF's Equal Opportunity policies.

IV) ACHIEVEMENTS OF AFFIRMATIVE ACTION PROGRAMS FOR VETERANS AND INDIVIDUALS WITH DISABILITIES (JANUARY 2004-DECEMBER 2004)

During this reporting period the University made "good faith efforts" to achieve the goals described in its 2004 Affirmative Action Plan, in its 1995 Transition Plan, and its February 1997 Self-Evaluation Study of Programmatic Accessibility.

A. PROGRESS MADE TOWARD GOALS AND OBJECTIVES OF THE AFFIRMATIVE ACTION PLAN

During this reporting period, (January 2004-December 2004) the Office of Diversity and Equal Opportunity:

1. Chaired the Physical Accessibility Workgroup (PAW), which prioritizes disability access issues for the campus.
2. Scheduled and partially funded three sign language interpreters for campus events for the reporting year.
3. Delivered, in conjunction with Human Resources staff, a training session on American with Disabilities Act accommodations.
4. Submitted VETS-100 report on veteran employees at USF to the U.S. Department of Labor.
5. Expedited disability related complaints brought to DEO under USF's Equal Opportunity Policies.
6. Provided furniture as a reasonable accommodation for individuals with disabilities including two requests for tables and chairs in the classrooms.

During 2004, the Office of Human Resources received a total of eight requests for reasonable accommodation from employees. HR approved two of the requests and withdrew/denied five of the requests. One application was determined to be incomplete for the same period.

Brief analyses of the data reported on Table 1 below indicate that a total of 19 complaints based on disability were filed with DEO over the last 5 years. The outcomes of these complaints are reported in columns 2, 3, 4, and 5 below.

TABLE 1
 Disability Related Complaints Filed
 With Office of Diversity and Equal Opportunity

Source: DEO Complaint Database.

Outcome of DEO Complaints Based on Disability					
	Dismissed	No Determination	Settled Informally	Determina- tion	Totals
July 99 – June 00	3		2		5
July 00 – June 01	1	1	2		4
July 01 – June 02	3				3
July 02 – June 03	2	2			4
July 03 – June 04	1	1		1	3
TOTAL					19

Analyses of the data reported on Tables 2 and 3 below indicate that:

1. Between September 2004 and August 2005, none of the newly hired USF employees were reported as Special Disabled Veteran reflecting no increase over September 2003-August 2004 when none of the new hires reported themselves as Special Disabled Veterans (see Table 2).
2. Between September 2004 and August 2005, 8 of the newly hired USF employees were reported as Vietnam Era Veterans reflecting a decrease over September 2003-August 2004 when 9 of the new hires reported themselves as Vietnam Era Veterans (see Table 2).
3. Between September 2004 and August 2005, 24 employees were reported as Other Protected Veterans reflecting an increase over September 2003-August 2004 when 17 of the new hires reported themselves as Other Protected Veterans (see Table 2).
4. Between September 2003 and August 2005, the number of Special Disabled Veterans remained unchanged at 8 (see Table 3).
5. Between September 2003 and August 2005, the number of Vietnam Era Veterans decreased from 138 to 121 (see Table 3).
6. Between September 2003 and August 2005, the number of Other Protected Veterans decreased from 63 to 34 (see Table 3).

TABLE 2
VETERANS HIRED BY USF

OCCUPATIONAL ACTIVITY CATEGORY- PRIMARY	HIRED SEPTEMBER 2003– AUGUST 2004			HIRED SEPTEMBER 2004 – AUGUST 2005		
	SPECIAL DISABLED VETS	VIETNAM ERA VETS	OTHER PROTECTED VETS	SPECIAL DISABLED VETS	VIETNAM ERA VETS	OTHER PROTECTED VETS
1. EXECUTIVE, ADMINISTRATIVE AND FACULTY		1			2	1
2. PROFESSIONAL S		4	7		4	6
3. TECHNICIANS		1	1		1	3
4. OFFICE AND CLERICAL			1			6
5. CRAFT WORKERS		2	2			5
6.LABORERS (UNSKILLED)		1	6		1	3
TOTALS	0	9	17	0	8	24

Source: USF Personnel database, GEMS.

TABLE 3
VETERANS IN USF WORKFORCE

OCCUPATIONAL ACTIVITY CATEGORY- PRIMARY	HEADCOUNTS OF EMPLOYEES SEPTEMBER 03- AUGUST 04			HEADCOUNTS OF EMPLOYEES SEPTEMBER 04- AUGUST 05		
	SPECIAL DISABLED VETS	VIETNAM ERA VETS	OTHER ELIGIBLE VETS	SPECIAL DISABLED VETS	VIETNAM ERA VETS	OTHER PROTECTED VETS
1. EXECUTIVE, ADMINISTRATIVE AND FACULTY		13	3		12	1
2. PROFESSIONALS	5	61	27	5	56	14
3. TECHNICIANS		16	5		10	
4. OFFICE AND CLERICAL	2	12	8	2	13	7
5. CRAFT WORKERS		28	8		23	6
6. LABORERS (UNSKILLED)	1	8	12	1	7	6
TOTALS	8	138	63	8	121	34

Source: USF Personnel database, GEMS.

B. PROGRESS REPORT ON GOALS AND OBJECTIVES OF 1995 ADA TRANSITION PLAN

The 1995 ADA Transition Plan of the University:

- a) Includes a survey of all architectural spaces along with cost estimates for accessibility renovations, and
- b) Establishes priorities for these accessibility renovations.

During 2004, USF coordinated work on the following projects funded by the PECO ADA Corrections Control Account:

- BSF 103A, 104A: ADA restroom renovations.
- BSN 1210, 1211: ADA restroom renovations.
- CHG: ADA audible crosswalk signals.
- LSA 112, 113, 113A: ADA restroom renovations.

- MHC 1736: ADA restroom renovations.
- MHF 144, 145: ADA restroom renovations.
- SOC 129, 157: ADA restroom renovations.

C. PROGRESS REPORT ON GOALS AND OBJECTIVES OF THE FEBRUARY 1997 ADA SELF-EVALUATION STUDY

The ADA Self-Evaluation Study was mandated by federal regulations implementing Title II of the ADA (28 C.F.R. Section 35.130). In its ADA Self-Evaluation Study, the University (1) evaluated its current services, policies and practices, (2) assessed its compliance with ADA Title II regulations, and (3) determined the extent to which modifications were needed to bring them in compliance.

The University of South Florida's Self-Evaluation efforts began in 1992 with a Task Force that included individuals with disabilities. The Office of Diversity and Equal Opportunity coordinated the activities of that Task Force, which produced several reports and made several recommendations. Beginning in January 1995, USF conducted a new and more comprehensive self-evaluation of services, policies and practices for compliance with the Americans with Disabilities Act. This Self-Evaluation included a compliance survey and solicitation of input from people with disabilities. A comprehensive questionnaire was used to solicit information from organizational units throughout the University. A formal Self-Evaluation report with recommendations was completed in February 1997. The 1997 Self-Evaluation and this 2005 Affirmative Action Plan are a reaffirmation of the University's commitment to create a barrier-free environment.

The progress made toward the goals and objectives of the Self-Evaluation Study are reported in the third column of Tables A, B, C and D below.

D. POLICY AND PROCEDURE DEVELOPMENT

Recommendations (Feb. 1997)	Offices and Actions to be Taken	Status/Actions Taken by December 2003
1. A reasonable accommodation procedure for student assistants to assure non-discrimination.	Career Resource Center and Human Resources will develop a procedure	Completed. HR has applied existing procedure to student assistants.
2. Distribution of the written emergency evacuation procedures to students, faculty and staff with disabilities.	Environmental Health and Safety is supplying a statement to Diversity and Equal Opportunity Affairs for dissemination.	Completed. A pamphlet was completed and given to EHSS and Student Disability Services.
3. A procedure for asking off-campus facilities used in recruiting if they are accessible	Admissions, with assistance from Diversity and Equal Opportunity, will develop a procedure to use in recruiting contacts	No action taken. No longer applicable.
4. Consistent use of the term "disability accommodations" in Admissions materials	Admissions, with assistance from Student Disability Services, will develop and apply consistent statements	Completed. SUS Admissions materials were recently reviewed by OCR in 1998 and found to be in compliance with ADA.
5. A guidebook for faculty, which includes, among other topics, a procedure for instructors to follow when students request an accommodation.	Student Disability Services is developing and will distribute the guidebook.	Completed. Extensive information is available to faculty at the Student Disability Services website. A hard copy guide is no longer planned.

E. TRAINING

Recommendations (Feb. 1997)	Offices and Actions to be Taken	Status/Actions Taken by December 2002
1. Training to accompany the faculty Guide to disability accommodations.	Student Disability Services is developing this guide	Completed. Available in ADA- ODT Training.
2. Notification and training of student government staff and officers on non-discrimination, accessibility, auxiliary aids, and other ADA requirements.	Diversity and Equal Opportunity will develop and offer a yearly workshop to student government.	Modified action taken. Ongoing. In student handbook.
3. Training of Custodial and Maintenance staff to ensure that accessible paths are maintained within buildings.	DEO and Physical Plant will design and conduct training in disability-related issues for Maintenance and Custodial staff.	Ongoing. DEO will work with Physical Plant to supplement its training programs.

F. CONTINUING THE SELF EVALUATION PROCESS

Recommendations (February 1997)	Offices and Actions to be Taken	Status/Actions Taken by December 2002
1. Evaluate the Graduate School's practices and requirements and design procedures to follow when exceptions for disability are requested.	Student Disability Services, Admissions, the Graduate School and DEO will develop and conduct this study.	Completed. Graduate School has published a procedure. Student Disability Services will look at applications if requested but no formal procedure is in effect.
2. Study the possibility of a full-time interpreter for the deaf members of university community	Diversity and Equal Opportunity will conduct the study, in association with Communication Sciences and Disorders	Modified action taken. Interpreters are hired as needed. Always available.
3. Review practices of all student organizations to ensure ADA compliance.	Diversity and Equal Opportunity will supply the Marshall Center with a survey document	Completed. Student organizations (and advisors) were notified of ADA obligations.
4. Analyze the promotional records of employees with disabilities to verify non-discrimination.	Diversity and Equal Opportunity, Human Resources, and Academic Affairs will design appropriate studies.	Action will be taken as needed based on University Policy.
5. Survey individual colleges concerning practices in advising, classroom assignment, and other areas.	Diversity and Equal Opportunity will continue to work with Academic Affairs, which has distributed the survey.	Completed. Academic Affairs distributed a survey form to Dean's offices during Fall, 1999 and later distributed results.
6. Establish a permanent advisory committee on ADA-related policies and procedures, which includes people with disabilities.	Diversity and Equal Opportunity will propose a structure for this committee.	Completed. A formal Physical Accessibility Workgroup (PAW) has been established to address accessibility issues.

G. MISCELLANEOUS

Recommendations (February 1997)	Offices and Actions to be Taken	Status/Actions Taken by December 2002
1. Students with disabilities will be involved in creating recreational programs.	Diversity and Equal Opportunity will work with Campus Recreation to solicit student input.	No action taken. AASD will work with Campus Recreation to get appropriate input from students.
2. Current televised courses do not offer closed captioning.	Distance Education will design procedures, which may include provision of sign language interpreters, to ensure access.	Sign language interpreters are provided on request. No formal policy has been developed. This falls within Academic Affairs.
3. The ADA Facilities Workgroup will plan for involvement of people with disabilities in the construction planning process.	Diversity and Equal Opportunity will develop a proposal in conjunction with the ADA Facilities Workgroup.	Ongoing as we do renovations, fund permitting.

CHAPTER 2

AFFIRMATIVE ACTION PLAN FOR VETERANS WITH DISABILITIES AND VETERANS OF THE VIETNAM ERA

This 2005 Affirmative Action Plan has been developed in accordance with applicable regulations to ensure continued compliance of the University with the Vietnam Era Veterans' Readjustment Assistance Act of 1974 and the implementing regulation 38 U.S.C. section 4212. It reaffirms the University's commitment to take affirmative action to employ and advance in employment qualified disabled veterans and veterans of the Vietnam era. It is a set of procedures designed to ensure equal employment opportunity by dismantling present discriminatory barriers and preventing future discrimination.

I) FEDERAL AND STATE DEFINITIONS

- A. Disabled veteran. The term is used to refer to:
 - 1. A person entitled to disability compensation under laws administered by the Veterans Administration for a disability rated at 30 percent or more.
 - 2. A person whose discharge or release from active duty was due to a disability incurred or aggravated in the line of duty.
- B. Modification. The term is used to refer to any alteration in the conditions of a building, including extensions to it.
- C. Reasonable Accommodation. The term is used to refer to an alteration or modification as described by the Americans with Disabilities Act. Reasonable accommodations are accommodations that do not impose undue hardships on the employer. They may include, but are not limited to:
 - a. Job restructuring, part-time or modified work schedules.
 - b. Alteration of facilities and/or programs so that they are accessible to, and usable by, persons with disabilities.
 - c. Provision of special equipment or "assistive" devices.
 - d. Adjustment or modification of non-essential functions of a job.
 - e. Provision of readers, scribes, interpreters or alternate format materials.
- D. Veteran of the Vietnam Era. This term is used to refer to a person who:

1. 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 from service with other than a dishonorable discharge.
 2. Was discharged or released from active duty for a service connected disability, if any part of the duty was performed between August 5, 1964 and May 7, 1975.
- E. Qualified disabled veteran. The term is used to refer to a veteran with a 30 percent or more disability who is capable of performing a job with or without reasonable accommodations.

**II) AFFIRMATIVE ACTION GOALS
(JANUARY 2005 – DECEMBER 2005)**

- A. The University of South Florida will not discriminate against any employee or applicant for employment because s/he is a disabled veteran or a veteran of the Vietnam era.
- B. The University will take affirmative actions to recruit, employ and advance in employment and otherwise treat qualified disabled veterans and veterans of the Vietnam era without discrimination based on their disability or veteran's status.
- C. The University will make appropriate reasonable accommodations for the known limitations of veterans with disabilities.
- D. The University will list employment vacancies with State employment service offices in the Tampa Bay Region. Through listings at the USF website, USF makes its vacancies available to an even broader constituency.
- E. The University will also take steps to eliminate attitudes and practices that create artificial barriers to employment.
- F. Under this Plan, the University of South Florida will take affirmative actions to employ and advance in employment veterans with disabilities and veterans of the Vietnam Era at all levels of its workforce. Affirmative actions will be taken in the following areas:
 1. Recruitment and vacancy announcements.
 2. Hiring, Training and Promotion.
 3. Pay and other forms of compensation.

**III) AFFIRMATIVE ACTION OBJECTIVES
(JANUARY 2005- DECEMBER 2005)**

- A. The University will invite all applicants and employees covered by the Affirmative Action Plan to identify themselves. This invitation will state that the information is voluntary, that it will be kept confidential, that refusal to provide the information will not subject the applicant or employee to any adverse treatment, and that it will be used only for affirmative action purposes.
- B. The affirmative action program shall be reviewed and updated annually. If there are any significant changes in procedures, rights or benefits those changes shall be described in the updated plan.
- C. The University will include the provisions of its policy in every subcontract or purchase order of \$10,000 or more, unless exempted by rules, regulations, or orders issued pursuant to Section 4212 of the Vietnam Era Veterans Readjustment Assistance Act.
- D. The University will follow its published policy and procedures for affirmative action and reasonable accommodation, when an applicant or employee makes a request for such. Individuals who are uncertain about their veteran or disability status should contact the Division of Human Resources or the Office of Diversity and Equal Opportunity for assistance.
- E. An employee may inform the University at any time of his/her desire for coverage under the Affirmative Action Plan.
- F. Any determination of veteran status must meet the requirements of the pertinent regulations, and must be for the sole purpose of affirmative action. Information obtained will not be used to exclude or otherwise limit employment opportunities of qualified individuals with disabilities.
- G. This 2005 Affirmative Action Plan will be available for inspection in the Offices of the Vice Presidents, Deans and Directors, and in the Office of Diversity and Equal Opportunity.
- H. When determining the qualifications of a covered veteran, the Office of Human Resources will review only that portion of the military record (including discharge papers) relevant to the specific job for which the veteran is being considered.

- I. The University will periodically review all job requirements to ensure that they are job-related and consistent with business necessity.
- J. Supervisors and managers will participate in seminars and workshops on the University's ADA Policy and reasonable accommodation process.
- K. The University will reasonably accommodate the physical and mental limitations of a veteran with a disability unless it can demonstrate that such an accommodation would impose an undue hardship on the conduct of its business.
- L. When appropriate and applicable, a reasonable accommodation will be made to facilitate the performance of the essential functions of a job, or to access a program or service sponsored by the University.
- M. In its effort to ensure that veterans are equitably promoted and compensated, the University will:
 - 1. Encourage veterans to avail themselves of promotional opportunities through its established open promotion system.
 - 2. Offer employment or promotions to veterans, without reducing the amount of compensation offered because of any disability income, pension or other benefits the applicant or employee receives from other sources.
- N. To enhance recruitment and selection of veterans the University's Equal Opportunity Liaisons (EOL) will:
 - 1. Inform search committees of resources that can be used to recruit veterans with disabilities and veterans of the Vietnam era.
 - 2. Maintain contacts with veteran and disability associations and organizations for information and referral.
 - 3. Ensure that selection criteria used in employment and promotion processes are reliable and job-related.
 - 4. Ensure that medical examinations and pre-employment inquiries will be used in compliance with the Americans with Disabilities Act.
 - 5. Inform all employees and prospective employees of the University's commitment to affirmative action for veterans.
 - 6. Send written notification of its policy to its subcontractors, vendors and suppliers.
 - 7. Take positive steps to attract qualified disabled veterans and qualified veterans of the Vietnam era who are not currently in its work force.

8. Evaluate the total selection process to ensure freedom from bias and stereotype.
 9. Conduct training on recruitment and selection of applicants to insure that the affirmative action commitments of the University are fully implemented.
 10. Enlist the assistance and support of recruitment sources including state employment services, rehabilitation agencies, veterans and disability related associations, organizations for veterans of the Vietnam era, and educational facilities serving veterans.
 11. Participate in "job fairs" for persons with disabilities and make a special recruiting effort to reach disabled veterans and veterans of the Vietnam era.
- O. In the development, promotion and implementation of Affirmative Action Programs, the University will promote greater employee cooperation and participation by:
1. Publishing applicable policies and procedures in employee handbooks, policy manuals and other relevant university media.
 2. Calling special meetings of executive, managerial and supervisory personnel to explain the intent of its Nondiscrimination and Affirmative Action policies.
 3. Including discussions of policies and procedures in management training and employee orientation programs.
 4. Including nondiscrimination and affirmative action clauses in purchase order forms, subcontracts and union agreements.
 5. Publishing articles about the accomplishments of veterans in University publications.
- P. To enhance proper maintenance of records and quick access to records, the University will:
1. Retain for a period of not less than five (5) years the records of complaints filed and actions taken under the Affirmative Action Plan.
 2. Retain employment records as required by the U.S. Department of Labor.
 3. Retain confidential documentation prepared in connection with reasonable accommodation requests in the Office of Human Resources, and ensure that these confidential records are kept separate and apart from other personnel records.
 4. Permit access to records and accounts pertinent to compliance with the Vietnam Era Veterans Readjustment Act of 1974.

IV) PENDING REGULATIONS

The Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended, 38 U.S.C. 4212 (VEVRAA), requires Government contractors and subcontractors to take affirmative action to employ and advance in employment qualified protected veterans. Congress has enacted the following which have amended VEVRAA:

- The Veterans Employment Opportunities Act of 1998 (VEOA), P.L. 105 339;
- The Veterans Benefits and Health Care Improvement Act of 2000 (VBHCIA), P.L. 106 419; and
- The Jobs for Veterans Act of 2002 (JVA), P.L. 107 288.

In the December 1, 2005 Federal Register, an OFCCP VEVRAA Final Rule was published for contracts awarded before December 1, 2003. The Final Rule makes the following changes to the VEVRAA regulations:

- Increases the contract threshold from \$10,000 to \$25,000;
- Required contractors to invite two groups of newly protected veterans to self-identify for VEVRAA coverage: other protected veterans and recently separated veterans; and
- Removes language referencing Letters of Commitment.

At a later date, following approval by the Office of Management and Budget, OFCCP will issue additional regulations implementing the JVA amendments that will apply to contracts of \$100,000 or more entered into on or after December 1, 2003.

CHAPTER 3

AFFIRMATIVE ACTION PLAN FOR INDIVIDUALS WITH DISABILITIES

One of the main purposes of the Americans with Disabilities Act (ADA) is to increase employment opportunities for persons with disabilities. Reasonable accommodation is a key provision of the Act. The average cost for employers to accommodate a disabled worker is \$500.00 according to a recent survey conducted by the Sears Corporation.

This 2005 Plan has been developed according to applicable regulations to ensure continued compliance of the University with Section 503 of the Rehabilitation Act of 1972. It reinforces and expands the programs described in the previous Affirmative Action Plans. It is a reaffirmation of the commitment of the University to take affirmative action to employ and advance in employment individuals with disabilities.

I. FEDERAL AND STATE DEFINITIONS

- A. Person with a disability. The term is used to refer to any person who:
 - 1. Has a physical or mental impairment, which substantially limits one or more of the major life activities of hearing, talking, seeing, walking, eating, breathing, learning, or caring for oneself. "Substantial limitation" occurs when a person is likely to experience difficulty in securing, retaining, or advancing in employment due to a documented disability, or
 - 2. Has a record of an impairment, or
 - 3. Is regarded, treated or perceived as having an impairment.
- B. Qualified Person with a Disability. The term is used to refer to an individual who is capable of performing the essential and marginal functions of a job with or without a reasonable accommodation.
- C. Essential Functions. The term is used to refer to the fundamental duties and responsibilities of an employment position.
- D. Reasonable Accommodation. The term is used to refer to:
 - 1. Modifications or adjustment to the job application process that enable a qualified applicant with a disability to be considered for a particular job.

2. Modifications or adjustments to the work environment or to the manner or circumstances under which a job is customarily performed.
3. Modifications or adjustments that allow the employee to enjoy the same employment benefits or privileges as an employee without a disability.
4. Reasonable accommodations may include, but are not limited to:
 - a. making facilities accessible to and usable by individuals with disabilities.
 - b. restructuring jobs.
 - c. using part-time or modified work schedules.
 - d. acquisition or modification of equipment or devices.
 - e. appropriate modification of examinations, training materials and policies.
 - f. provision of readers, scribes, or sign language interpreters.
 - g. provision of alternate format publications and materials.
 - h. reassignment to a lateral, vacant position.

II. AFFIRMATIVE ACTION GOALS (JANUARY 2005- DECEMBER 2005)

- A. The University of South Florida will:
 1. Take actions to facilitate reasonable accommodations to the physical or mental impairments of persons with disabilities.
 2. Take steps to eliminate attitudes and practices that create artificial barriers to the employment of individuals who have disabilities.
 3. Review reasonable accommodation requests made by any individual with disabilities.
- B. The University of South Florida will not discriminate against any employee or applicant for employment who has a physical or mental disability when the applicant or employee is qualified for a position.
- C. The University will take affirmative actions to recruit, employ, and advance in employment qualified persons with disabilities.
- D. Equal opportunity statements will be posted throughout the University on Job Advertisements. The statements will, upon request, be made available in alternate format.
- E. Individuals who have a documented disability will be invited to request a reasonable accommodation.

- F. The ADA Policy of the University will be posted on the USF Web Site. The Policy will, upon request, be made available in alternate format.
- G. The University will neither affiliate with, nor grant recognition to, any individual, group, or organization having policies that unlawfully discriminate in employment or education.
- H. The University will include the provisions of its policy in every subcontract or purchase order of \$25,000 or more unless exempted by rules, regulations, or orders issued pursuant to Section 503 of the Vocational Rehabilitation Act of 1973.

All agents and contractors of the University will be required to comply with this policy in the exercise of their functions. Anyone who believes that s/he has been denied the benefits of the Affirmative Plan should contact the Office of Diversity and Equal Opportunity for guidance.

III. AFFIRMATIVE ACTION OBJECTIVES (JANUARY 2005-DECEMBER 2005)

- A. The Affirmative Action Plan shall be reviewed and updated annually. If there are any significant changes in procedures, rights or benefits those changes shall be described in the updated plan.
- B. The University will invite all applicants and employees who believe they are covered by the Plan to self-identify. To facilitate self-identification, the University will:
 - 1. State that the information is voluntary.
 - 2. Acknowledge that refusal to provide the information will not subject the person to adverse treatment in employment or hiring.
 - 3. Maintain the information in a confidential manner.
 - 4. Use the data for affirmative action purposes only.
 - 5. Remind employees of the University's ADA Policy and Procedure.
- C. Employees and applicants, who believe that they are persons with disabilities or who are uncertain about the applicability of the law to them, may confidentially contact the Division of Human Resources for guidance.
- D. An employee with a disability may inform the University at any time of his or her desire to utilize the protection of the Affirmative Action Plan.

- E. Any determination of disability must meet regulation requirements and must be for the sole purpose of affirmative action. Requests for documentation to verify existence of a disability will be made in accordance with the Americans with Disabilities Act, the American Medical Association's Guide for the Evaluation of Impairment or the American Psychological Association Standards for Diagnosis.
- F. Copies of this 2005 Update of the Affirmative Action Plan will be available for review in the Office of Diversity and Equal Opportunity.
- G. The Associate Vice President for DEO and the Director of Human Resources will periodically review personnel processes to determine whether present personnel procedures ensure consideration of persons with disabilities for hiring and promotions. Whenever appropriate, the Associate Vice President for DEO and the Director of Human Resources will recommend corrective actions to the Provost and Vice President for Academic Affairs.
- H. The Division of Human Resources will periodically review essential and marginal functions listed in position descriptions to ensure that they are job related and consistent with business necessity. Department heads will be consulted, as needed.
- I. The University will make a reasonable effort to eliminate barriers that prevent or impede the employment and advancement of persons with disabilities, unless such an accommodation would impose an undue hardship on the University.
- J. The Office of Human Resources will review requests for accommodation in the application and selection processes and provide reasonable accommodations.
- K. The University will encourage employees with disabilities to seek promotional opportunities through the established promotion system.
- L. The Office of Diversity and Equal Opportunity and the EOLs will review hiring reports and verify that qualified persons with disabilities are considered for hiring or promotion.
- M. The Division of Human Resources will review compensation offered to a person with a disability and verify that the compensation has not been reduced because of disability income, pension or other supplemental compensation that the person receives.

- N. The Office of Diversity and Equal Opportunity and the EOLs will ensure that search committees utilize recruiting sources that focus on persons with disabilities.
- O. Human Resources and the Office of Diversity and Equal Opportunity will initiate contacts with recruitment sources that focus on persons with disabilities.
- P. Academic divisions of the University will maintain contacts with social and professional organizations that advocate employment of persons with disabilities.
- Q. The Office of Diversity and Equal Opportunity and the Division of Human Resources will, periodically, review selection criteria for job-relatedness.
- R. The University will implement the following recruitment and promotional strategies:
 - 1. Inform all employees and applicants of its commitment to take affirmative actions to employ and promote qualified disabled individuals.
 - 2. Include persons with disabilities in promotional materials.
 - 3. Send written notification of its equal opportunity policy to subcontractors, vendors and suppliers.
 - 4. Take positive steps to attract disabled individuals who are not currently in its workforce.
- S. To ensure cooperation and participation of students and employees in the implementation of this Plan, the Office of Diversity and Equal Opportunity will:
 - 1. Publish its policy in appropriate print and electronic media.
 - 2. Hold special meetings with executive, management, and supervisory personnel to explain the intent of its policy.
 - 3. Disseminate the policy at employee orientation and training programs.
 - 4. Ensure that nondiscrimination and affirmative action statements are posted bulletin boards across the University.
- T. The University will send vacancy announcements to local and state institutions that focus on persons with disabilities.
- U. Human Resources and the Office of Diversity and Equal Opportunity will continually evaluate the selection process to ensure freedom from bias and stereotype.

- V. The Office of Diversity and Equal Opportunity will maintain, for a period of not less than five years, the records of discrimination complaints based on disability.
- W. Human Resources will maintain the employment records of persons with disabilities, as required by the Office of Federal Contract Compliance Programs (OFCCP) of the U.S. Department of Labor. The Division of Human Resources will also maintain the records associated with an employee's request for reasonable accommodation; and will keep these records separate and apart from the employee's permanent personnel file.
- X. The University will permit access to its places of business, books, records and accounts as required by the Rehabilitation Act of 1974, and the Sunshine Law of the State of Florida.
- Y. Complaints of unlawful discrimination based on disability filed under the affirmative action program will be investigated according to the Complaint Procedures of the University.

CHAPTER 4

INTERNAL AUDIT AND REPORTING SYSTEM

The Internal Audit and Reporting System provides for:

- 1) Maintaining and monitoring accurate and up-to-date records of referrals, applications, hires, promotions, transfers and terminations to be certain that all employees are treated on a fair and equitable basis.
- 2) Requiring formal reports from unit managers on a scheduled basis that indicate progress or lack of progress toward affirmative action and equal opportunity goals and objectives.
- 3) Reviewing all selection, promotional and training procedures to ensure that they are nondiscriminatory.
- 4) Informing senior managers of the effectiveness of the equal opportunity and affirmative action policies.

CONCLUSION

The University of South Florida (USF) is a multi-campus national research university that supports the development of the metropolitan Tampa Bay Region, Florida, the United States and the world. Building upon unique strengths inherent in Florida's population will increase USF's opportunities to become a premier national research university. One of the many strengths that can be found in the Tampa Bay Region and Florida is the diversity among its population. The location and population of Florida and the Tampa Bay Region create opportunities for the University of South Florida to make extraordinary contributions in areas of diversity, building on the region's cultural identities and ethnic heritage. USF is committed to making diversity and equity a fundamental, integral part of all university operations. USF embraces diversity and seeks gender, racial, ethnic, disability, veterans and employment equity.

In conclusion, the University of South Florida complies with Federal Equal Opportunity Laws and Regulations. USF is committed to the policy that all persons shall have equal access to programs, facilities, admissions, academic programs and employment without regard to personal characteristics not related to ability, performance or qualifications as determined by University policy or by state or federal laws and regulations. It is the policy of the University to maintain an academic and work environment free of unlawful discrimination and sexual harassment.