



**MARQUETTE UNIVERSITY**  
**March 2017**

**I. AFFIRMATIVE ACTION PROGRAM FOR MINORITIES AND WOMEN**

Marquette University affirms its long-standing commitment to the principle of equal employment opportunity regardless of race, color, gender, age, sexual orientation, religion, disability, veteran's status or national origin. Marquette affirms its commitment to the principle of affirmative action and its commitment to abide by s. 16.765, Wis. Stats., state regulations and federal laws pertaining to equal employment opportunity and affirmative action during the life of a contract with the State of Wisconsin by not basing decisions on age, race, religion, color, handicap, sex, physical condition, developmental disability, sexual orientation or national origin. It is Marquette's policy that recruitment, employment, promotions, demotions, transfers, compensation, training, terminations, and other personnel decisions will be made to achieve a balanced work force, in accordance with the principles of equal employment opportunity and affirmative action. An Affirmative Action Officer/Equal Opportunity Coordinator is designated within the Department of Human Resources, and along with senior university personnel is responsible for planning and implementing the Affirmative Action, Equal Opportunity Plan. At the time of this writing the title of Affirmative Action Officer is held by Ms. Lynn Mellantine, Assistant Vice President of Human Resources at Marquette.

While Marquette does not discriminate in any manner contrary to law or justice in its educational programs or activities, including employment and admissions practices, it cherishes the right and duty to seek and retain personnel who will make a positive contribution to its religious character, goals and institutional mission of Excellence, Faith, Leadership and Service.

As Marquette is a religious educational institution with Jesuit tradition, sponsorship, and support, it reserves the right to maintain its heritage and identity as a Christian and Catholic witness in higher education. As a religious educational institution, the University may grant preference to Jesuits in its employment practices.

The Marquette University **Statement on Human Dignity and Diversity** sets forth the philosophy, policy and practices related to institutional diversity, justice and human dignity that is an integral part of the Marquette mission. The statement (Attachment A) can be located at: <http://www.marquette.edu/diversity>.

**Dissemination of Policy**

1. The University's Affirmative Action and Equal Opportunity policy statement will be included in the Undergraduate, Graduate, Law School, Summer Studies and Dental School Bulletins. It will also be included in the faculty, employee, and student handbooks, and other publications where appropriate.

2. Notice that Marquette University is an equal employment opportunity/ affirmative action employer will be posted permanently on official bulletin boards throughout the University and be communicated to employees on a periodic basis through a variety of University publications.
3. The Affirmative Action Officer/Equal Opportunity Coordinator or designee will regularly disseminate information to supervisors, managers and other administrative personnel regarding internal compliance requirements, recruitment, etc. and will include information regarding the University's commitment to equal opportunity and affirmative action, as well as its responsibilities under Executive Order 11246, as amended. The Affirmative Action Officer/Equal Opportunity Coordinator or designee will also disseminate information regarding the University's policies to new employees during the monthly New Employee Orientation sessions conducted by the Department of Human Resources.
4. The Vice President of Human Resources will inform union officials of the University's policy and express an expectation of their support and compliance, including the inclusion of non-discrimination clauses in all union agreements, as appropriate.
5. A copy of the Affirmative Action Program will be available on the Marquette University web site; copies will be made available as requested during normal working hours (8 a.m. – 4:30 p.m. Monday through Friday) at the Department of Human Resources, Straz Tower – Room 185.
6. Employment advertisements will communicate the policy in offices, agencies and institutions, as appropriate, including: the media; minority, women's, disabled and veterans' organizations; and community agencies. Employment opportunities will be communicated to the State Employment Job Service Office.
7. The equal employment opportunity clause will be incorporated, as appropriate, in purchase orders, leases and contracts covered by Executive Order 11246, as amended, and in compliance with Section 503 of the Rehabilitation Act of 1973 and the Vietnam Era Veterans Act of 1974 (VEVRAA), as amended including all covered veterans, issued to subcontractors, vendors and suppliers by those who issue such documents. Written notification of the University's policy will be communicated to all subcontractors, vendors and suppliers requesting them to take appropriate action in their support and endorsement of Marquette's efforts.
8. Any inquiries or requests regarding the university's Affirmative Action Program may be directed to the Department of Human Resources, specifically to the Assistant V.P. of Human Resources or to the designated Affirmative Action Officer at 288-7305.

## **Responsibility for Administration and Implementation**

### President

While retaining the overall responsibility for institutional objectives, Marquette's President has delegated to the Department of Human Resources the assignment of administering the Equal Employment Opportunity and Affirmative Action Program for the university.

## Provost

The Provost is responsible for the coordination, implementation and improvement of equal employment opportunity and affirmative action practices across campus. Where questions, problems or concerns arise relative to the policies or practices, the Provost will bring such matters to the attention of the Vice President of Human Resources, or to Affirmative Action Officer/Equal Opportunity Coordinator directly. Where problems are identified within respective units, recommendations will be included to address them.

The Provost is responsible for the administration of Section 504 of the Rehabilitation Act of 1973 and Title I of the Americans with Disabilities Act of 1990. While retaining the responsibilities as noted, the Provost has delegated to individuals within the area the responsibilities as described below.

The Director of Disability Services, within the Office of Student Educational Services, is responsible for accommodating identified students with disabilities and assisting them with concerns and/or grievances where appropriate.

The Dean of Admissions and the Vice Provost for Research and Graduate Programs are responsible for reviewing and monitoring admissions and financial aid practices for equal opportunity and affirmative action purposes where appropriate.

The Executive Director of the Educational Opportunity Program and the Director for Multicultural Affairs of the Dental School are responsible for programs which increase academic opportunities for minority students at the University.

The Chief Information Officer, in conjunction with the Human Resources Department, is responsible for the maintenance of accurate and timely personnel data regarding all classifications of non-student personnel, and graduate teaching and research assistants. Further, the CIO is responsible for developing computerized programs in conjunction with the Affirmative Action Officer/Equal Opportunity Coordinator to accomplish the required compliance reporting needs and the annual affirmative action reports/ analyses based on the personnel database and other databases where appropriate.

The Vice President for Student Affairs is responsible for the coordination, implementation and improvement of equal opportunity practices relative to the operation of all student activities approved by the Office of Student Affairs.

The Dean of Students in conjunction with the MultiCultural Center staff is responsible for programs, activities and services of the Center which are designed to assist the cultural and special development of students from various ethnic groups and to help educate students about diverse and non-traditional cultures.

The Vice President of Athletics and the Title IX Coordinators are responsible for gender equity in the athletic area.

### Vice President of Human Resources

The Vice President of Human Resources is responsible for: the oversight of the Affirmative Action Program; the coordination, implementation and improvement of personnel practices; the general responsibility for the administration of compliance policies for Section 503 of the Rehabilitation Act of 1973, the Vietnam Era Veteran's Readjustment Act of 1974, as amended, and Title I of the Americans with Disabilities Act of 1990; and the existence of the Personnel Data Base from which the Affirmative Action Officer/Equal Opportunity Coordinator draws required governmental reports.

### Affirmative Action Officer/Equal Opportunity Coordinator

The Vice President of Human Resources, has delegated the following responsibilities to Affirmative Action Officer/Equal Opportunity Coordinator: the general responsibility for the administration of the equal employment opportunity, affirmative action, and compliance policies of the University as they affect women, minorities, disabled veterans, Vietnam Era Veterans and other covered Veterans, persons with disabilities, and other protected classes.

The University's Affirmative Action Officer/Equal Opportunity Coordinator will be given the necessary senior management support to execute responsibilities including, but not necessarily limited to, the following:

- a. Developing policy statements, affirmative action programs, and internal and external communication techniques.
- b. Assisting administrators in the identification of problem areas and recommending solutions to problems within those areas.
- c. Designing and implementing audit and reporting systems that will measure the effectiveness of the programs.
- d. Keeping University administration informed of latest developments in the equal opportunity/affirmative action area in conjunction with University General Counsel.
- e. Hearing, investigating, mediating and recommending resolutions to grievances of employee applicants and employees regarding the University's equal opportunity and affirmative action policies.

## Deans, Directors, Department Chairpersons, Administrators and Supervisors

Each Dean, Director, Department Chairperson, Administrator or Supervisor is responsible within his/her area of jurisdiction for conducting his/her activities in a manner which will ensure compliance with this policy and program and will communicate to his/her immediate supervisor through reporting channels the exact nature of any equal opportunity/affirmative action problem that may arise or be identified as well as the recommended action plan to address and resolve the problem.

### **Internal Audit and Reporting Systems**

The following procedures have been instituted in order to make every effort to continually audit, monitor and evaluate compliance with the Affirmative Action Program and its achievements of specific goals, action plans and timetables relative to minorities and females at all levels:

- A. The Affirmative Action Officer/Equal Opportunity Coordinator or designee, will be responsible for the preparation of the workforce, job groups, utilization, area representation analyses, and the goals and goals progress reports for all positions. These analyses and reports will be based on the university's computerized database, appropriate resource materials, and data supplied by reporting units. Applicant flow data and analyses of hiring, promotions and terminations will also be included. Where problems are identified within a specific area, recommendations will be made to address and resolve them. Where appropriate, recommendations to broaden and strengthen efforts to increase opportunities for women and minority group members which are consistent with Federal and State laws will be included.
- B. Internal reporting shall be required on a periodic basis from all university departments in order to monitor adherence to, and results of, the Affirmative Action Program.
- C. On an ongoing basis, the Vice President of Human Resources will review selection, promotion and training procedures to ensure equal opportunities for all applicants and employees.
- D. On a periodic basis, the university's leadership committee including the Provost, Deans and Vice-Presidents, will be updated on the status of the Affirmative Action Program and will receive recommendations from the Vice President of Human Resources, as necessary, relative to achieving compliance with the goals and objective of the program.

### **Affirmative Action Goals and Steps**

The university has implemented procedures and processes to perform detailed analysis of its total employment process to determine whether, and where, impediments to equal employment

opportunity and affirmative action may exist within the organization. Systems are in place to evaluate:

- A. The overall workforce by organizational unit and job group to determine whether there are problems related to minority or female utilization (employment within a specific unit or group), or of minority or female distribution (placement in the different job groups within the unit or group);
- B. Personnel activity, including applicant flow, hires, terminations, promotions and related personnel actions in order to determine whether there are selection disparities;
- C. Compensation systems and practices to determine whether there exists gender, race or ethnicity-based disparities;
- D. Selection, recruitment, referral and other personnel procedures to determine whether they result in disparities in the employment or advancement of minorities or females;
- E. Hiring managers processes and procedures in regards to job postings. Working with and verifying hiring managers are recruiting in a way that reaches a more diverse candidate pool.
- F. Any and all other areas or practices that might have a negative influence on the goals and the success of the university's affirmative action program
- G. Failure by any faculty and staff member to adhere to Marquette University's Affirmative Action policy may result in disciplinary action up to and including termination.

#### Specific Problem Areas Identified:

##### **Underutilization of Minority and Women in Faculty Positions**

While Marquette is committed to eliminating underutilization of women and minorities in faculty positions, student demographics and fluctuating enrollments, financial constraints, Jesuit emphasis in hiring, and the large number of tenured faculty in some departments, may not permit immediate achievement of established goals. Along with other universities, Marquette experiences fluctuations in overall enrollment and in enrollment in specific colleges and programs from year to year. As a result of this, the number of available positions may change. Further, the general overall financial constraints currently being felt by institutions of higher education have to some extent affected the affirmative action efforts of Marquette. While Marquette offers competitive salaries, it cannot compete with many governmentally sponsored institutions of higher education or some independently sponsored institutions which are more extensively endowed, nor can the University presume to compete with industry and governmental agencies also involved with recruiting from all sections of the population, including doctoral degree candidates. Marquette is firmly committed to the preservation of the existing relationship between the University and the Jesuits in its academic and administrative hiring policies. As a result of Marquette's valid preference for Jesuits in some positions, the number of openings available for women and minorities may be fewer. In spite of these obstacles, Marquette continues its commitment to meet goals which are targets of good faith efforts, and to create an institutional workforce which maximizes the employment opportunities for women and minorities in faculty positions.

##### **Underutilization of Minorities and Women in Craft Positions**

Marquette has a small, dedicated staff of general maintenance workers. Due to the small number of positions, the opportunities to increase the number of minorities and women in this job group have been limited due to a relative small number of openings and the competition for qualified females and minorities in the skilled craft area.

## **Underutilization of Minorities and Women in Service Positions**

The positions within these job groups have traditionally attracted a higher number of qualified male applicants. The positions in these job groups include Public Safety Officer, Maintenance Mechanic, Truck Drivers, Groundskeepers, and Custodians. Qualified female and minority applicants are encouraged to apply.

## **Underutilization of Minorities in Office and Clerical Positions**

The variance in this area is slight, and has not been an issue in past analysis. This job group will be monitored to ensure the hiring practices encourage qualified minority applicants and hires.

## **Action-Oriented Programs**

The university has in place specific programs, practices and policies which are designed to address and correct any problem areas that are identified out of the process listed above (Identification of Problem Areas) and to assist in reaching established plan goals and objectives. These policies and practices are in place to assist in achieving positive results, an ongoing improvement over previous results and a removal of identified barriers to reaching identified plan goals and producing measurable results.

### **1. Selection Process for New or Vacant Positions**

The university's policy on Position Requisitions is contained in UPP 4-23 and is summarized below:

The Position Requisition is an online process used to authorize a new position or to pre-authorize the filling of an existing vacant position for staffing, budget and headcount purposes. The Position Requisition Policy is an integral part of Marquette University's Human Resource and Finance Office Policy and is required for compliance with the University's Affirmative Action Program. All positions (faculty and non-faculty) require an approved online requisition be completed via Employment@Marquette before an individual is hired to fill that open position. The online requisition is reviewed by the Department of Human Resources to ensure that job descriptions are current and job-related; requested application materials and questions are job-related and consistent with business necessity; and that recruitment plans are in congruence with the goals of the Affirmative Action Program. All recruiting advertisements, including notices, letters and on-line postings will indicate where space and budget allow that "Marquette University does not discriminate in any manner contrary to law or justice on the basis of race, color, gender, sexual orientation, age, religion, national origin, disability or veteran's status in its educational programs or activities, including employment and admissions. At the same time, Marquette cherishes its right and duty to seek and retain personnel who will make a positive contribution to its religious character, goals and mission." Where space and/or budget do not allow, the following statement is to be used "Marquette is an equal opportunity and affirmative action employer" or "AA/EOE." The Department of Human Resources evaluates the total selection process on an ongoing basis to ensure freedom from bias, to recommend techniques to improve recruitment of minority and female applicants, and ensure congruence with our Affirmative Action Program and goals.

### **2. Record Keeping**

All search process documentation and materials will be available in the online applicant tracking software, Employment@Marquette, including application materials, recruitment plan, and

disposition of candidates. Other records pertaining to the search process will be maintained by the hiring department including names of interviewers and copies of advertisements.

### **3. Internal Candidates for Employment**

Recognizing the University's desire to encourage the personal, spiritual and professional development of its current employees, as outlined in University Policies and Procedures 04-5, [http://www.marquette.edu/upp/documents/upp4-05\\_003.pdf](http://www.marquette.edu/upp/documents/upp4-05_003.pdf), the University may conduct an internal search exclusively when a vacancy occurs, (although an external search may also be conducted concurrently when appropriate), when it is determined that a single qualified candidate, or a number of qualified candidates, exist internally.

### **4. Jesuit Presence**

While Marquette University is firmly committed to and reaffirms its policy of nondiscrimination and affirmative action in its recruitment practices, it also reserves its right to grant preference to persons who will advance its Jesuit and Catholic identity as established within the educational traditions of the Society of Jesus. This it must do to exercise its religious and educational mission and maintain its institutional integrity. As a Jesuit university, Marquette will therefore consider the candidate's expressed willingness to support and carry out the university's stated mission as a key criterion in the hiring process of all employees. In addition, the University will weigh the candidate's willingness to understand and engage Catholic intellectual and social tradition as a pertinent consideration in the appointment of faculty and administrators. Marquette University may grant preference in its employment practices to members of the Society of Jesus. e.g. the University may favor a qualified Jesuit applicant over a qualified non-Jesuit applicant for an academic or administrative position. To preserve the existing relationship between the University and the Society of Jesus, recruiting efforts will include notification of the Office of Mission and Identity of faculty and administrative vacancies as they occur. If such vacancies can be filled by a fully qualified Jesuit, no further affirmative action efforts will be required.

### **5. Provost's Directive**

The university expects all full-time faculty and staff searches to include diverse candidates in the applicant pool, especially those who are from populations considered underrepresented in the unit, department, faculty discipline, or at the university.

The Executive Director for Diversity and Inclusion will meet with Search Committees and Hiring Managers during the initial planning of each search. Then as part of the position approval process, the Associate Provost will verify that appropriate guidance has been delivered to those responsible for candidate selection and make additional recommendations to the final recruitment plan where appropriate.

At the conclusion of the recruitment process, if no diverse candidates meeting the qualifications for the position have been identified, a rationale must be submitted to the Associate Provost prior to advancing the search to the interview stage. The Associate Provost, in collaboration with the chair/dean/vice president, may extend/expand the search if efforts to recruit a diverse pool of applicants is not adequate. The Associate Provost for Diversity and Inclusion will be apprised of candidates that are included in the final pool and ultimately selected.

## **6. Compensation Systems**

The university seeks to offer fair, equitable and competitive compensation to all its employees. Compensation will be set within the guidelines established by the University's wage and salary system for all exempt and non-exempt non-faculty employees on an individual basis and will be based on such appropriate factors as: skills, experience, length of service, merit, and position held. Marquette University is committed to maintaining a compensation program that is both internally and externally equitable and non-discriminatory. Compensation for faculty will be set within each department on an individual basis in response to "market" factors. The Provost annually will review the compensation of faculty to determine whether or not discrepancies exist in the area. If a thorough analysis of any faculty position at the University reveals an employee's compensation is adversely affected as a result of unlawful discrimination, appropriate corrective action will be taken. Compensation of staff positions are based on the Department of Human Resources wage and salary program which includes the following:

1. Current job descriptions or position evaluation questionnaires as a basis for classifying, evaluating and categorizing jobs. These job descriptions will be used to:
  - a. Indicate actual responsibilities and actual duties.
  - b. Clearly identify required qualifications, experience and necessary skills, as well as essential functions, of the job itself.
  - c. Establish classification of positions.
  - d. Establish job groups for administrative, professional, clerical, technical, skilled crafts, and service maintenance positions.
2. A position evaluation/grading system based upon the duties, levels of responsibility and qualifications of the positions.
3. A wage and salary structure which includes separate job groups with approximately the same level of responsibility and value to the University and applies a "broad band" wage range to each respective job group.
4. Wage and salary adjustments on an annual basis by use of internal performance evaluations and external market survey data to maintain competitive wages and salaries and competitive compensation for duties performed, e.g., surveys, cost of living indices, consumer price index, etc.

The Vice President of Human Resources or his/her representative will work with the Division of Finance and the Budget Office to periodically evaluate the university's compensation program and practices and to make remedial recommendations for individuals or positions that are either low or inappropriately classified, within the financial and budgetary capabilities of the institution.

## **7. Sexual Harassment and Racial Abuse and Harassment Policies**

The University seeks to provide its students, employees and members of its community an academic and working environment in which the dignity and worth of each member of its community is respected, and has established Sexual Harassment and Racial Abuse and Harassment policies which offer guidelines and protections. They are intended to reinforce the proper conduct and professional manner expected of members of the University community and especially of those who participate in relationships of academic and professional trust. Students and employees are expected to follow

and support the policies.

## **II. AFFIRMATIVE ACTION PROGRAM FOR INDIVIDUALS WITH DISABILITIES**

For purposes of this section a person with a disability is defined as 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. For purposes of this section, a person with a disability is "substantially limited" if he or she is likely to experience difficulty in securing, retaining or advancing in employment because of a disability.

### **Policy**

Marquette University, in accordance with Section 503 of the Rehabilitation Act of 1973, as well as the Americans with Disabilities Act (ADA) of 1990, is committed to maintaining an affirmative action program to employ and advance in employment qualified individuals with disabilities at all levels of employment, including the executive level. Such action will apply 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.

Persons with disabilities who wish to declare themselves under the Section 503 Affirmative Action Program and/or the Americans with Disabilities Act (ADA) of 1990 will be invited to voluntarily identify themselves to the University. The opportunity to disclose information will be voluntary and all disclosed information will be kept confidential.

Personnel processes will be reviewed and analyzed to assure careful, thorough and systematic consideration of the job qualifications of known applicants and employees with disabilities for job vacancies filled either by hiring or promotion, and for all training opportunities offered or available. Physical and mental job qualification requirements for employment selection, promotion, demotion and training will not discriminate against qualified applicants and employees with disabilities. Marquette University will review physical or mental job qualification requirements on an ongoing basis and as new job qualification requirements are established to insure that, to the extent qualification requirements tend to screen out qualified individuals with disabilities, they are related to the essential functions of the job for which the individual is being considered and are consistent with business necessity and the safe performance of the job. After review, the job qualifications will be available to those involved in recruitment, screening, selection and promotion processes. Employment records will be reviewed to determine (1) the availability of promotable and transferable qualified known employees with disabilities and (2) utilization of their present and potential skills. The University, as a policy and practice, will make reasonable accommodations to otherwise qualified employees with disabilities in all cases, unless such accommodations impose an undue or unusually serious hardship on the University.

Whenever the University has information about an applicant's or employee's physical or mental condition or conducts a medical examination following a job offer or change in employment status, such information will be kept confidential except that (a) supervisors and administrators may be

informed regarding restrictions on the work or duties of individuals with disabilities and regarding accommodations; (b) first aid and safety personnel may be informed, where and to the extent appropriate, if the condition might require emergency treatment; and (c) government officials investigating compliance with the act may be informed in the course of their authorized investigation.

### **Responsibility for Administration and Implementation | Internal & External Dissemination**

The Vice President of Human Resources will be responsible for the oversight of the development, implementation and periodic evaluation of activities designed to achieve the goals of the affirmative action program for employees with disabilities at Marquette University. The Assistant Vice President of Human Resources is also the university's ADA Workplace Coordinator. Responsibilities will specifically include:

1. Implement policy, affirmative action programs and internal and external communication techniques which include regular communication with administrators, supervisors and employees to be certain the University's policies are known and adhered to.
2. Advise supervisors that (a) their work performance includes compliance with the university's equal opportunity and affirmative action policy, as well as other criteria and (b) the University is obligated to prevent harassment of employees placed through affirmative action efforts and to educate managers and supervisors on policy.
3. Ensure that equal employment opportunity materials are displayed in public places accessible to employees and applicants.
4. Review and update the Affirmative Action Program for Persons with Disabilities regularly and retain a copy for on-site inspection upon request.
5. Inform administration and supervisors about the University's obligation to comply with Section 503 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act (ADA) of 1990 and solicit their support.
6. Implement and monitor audit and reporting systems that will:
  - a. Measure the effectiveness of Marquette University's programs.
  - b. Indicate need for remedial action, when necessary.
  - c. Determine the degree to which Marquette University's objectives have been attained and what additional affirmative action efforts are needed.
7. Serve as a liaison between Marquette University and organizations of and for persons with disabilities, and arrange for the active involvement by University representatives in community service programs of local organizations for the disabled.

8. Keep administration informed of latest developments in the applicable Affirmative Action area concerning employees with disabilities.
9. Arrange for career counseling for known employees with disabilities when it is requested.
10. Conduct other proactive outreach measures to assist with the recruitment of qualified applicants with disabilities to open job positions at Marquette under this program.

### **III. AFFIRMATIVE ACTION PROGRAM FOR SPECIAL DISABLED VETERANS, VIETNAM ERA VETERANS & OTHER COVERED VETERANS**

For purposes of this section, disabled veteran means a person 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.

A Vietnam Era veteran is defined as a person who (1) served on active duty for a period of more than 180 days, any part of which occurred between February 28, 1961 and May 7, 1975 in the Republic of Vietnam and was discharged or released therefrom 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 in all other cases.

#### **Policy Statement (To be posted on university bulletin boards, physical & electronic)**

Marquette University, in compliance with the Vietnam Era Veterans Readjustment Assistance Act of 1974, as amended (38 U.S.C. 4212, or VEVRAA), does not discriminate in its employment practices against disabled veterans, Vietnam Era veterans, or other covered veterans. Marquette University historically has been committed to promoting equal employment opportunities for all persons with disabilities and has affirmed the commitment in its Affirmative Action Program for Persons with Disabilities. Under the provisions and regulations of VEVRAA, Marquette affirms its commitment and obligations to take affirmative action to employ and advance in employment all qualified persons with disabilities including disabled veterans. Marquette University further commits itself to promote equal employment opportunities for Vietnam Era veterans and all other covered veterans. It will treat such veterans without discrimination in all employment practices including, but not limited to, hiring, upgrading, demotion or transfer, recruitment or recruitment advertising, lay-off or termination, rates of pay or other forms of compensation, and selection for training, including traineeships and on-the-job training programs. An affirmative action clause will be included in all applicable contracts and subcontracts. Marquette University will invite all disabled veterans, veterans of the Vietnam Era, and other covered veterans who wish to benefit under the affirmative action program to identify themselves on a voluntary and confidential basis.

## **Review of Employment Processes**

Human Resources processes will be reviewed to assure careful, thorough and systematic consideration of the job qualifications of known disabled veterans, Vietnam Era veterans, and other covered veteran applicants for job vacancies filled either by hiring or promotion, and for all training opportunities offered or available. In determining the qualifications of a covered veteran, Marquette University will consider only that portion of the military record, including discharge papers, relevant to the specific job qualifications for which the veteran is being considered. Established university policies prohibit the harassment of any employee, including veterans identified under this section.

## **Physical and Mental Qualifications**

Physical and mental job qualification requirements of employment selection, promotion, demotion and training will not discriminate against qualified disabled veterans. Marquette University will conduct ongoing reviews of physical or mental job qualification requirements to ensure that the requirements are related to the essential functions of the job for which the individual is being considered and are consistent with business necessity and the safe performance of the job. After review, the job qualifications will be available to the supervisors or managers involved in recruitment, screening, selection and the promotion process. The University will also make reasonable physical and mental accommodations to qualified covered veterans unless such accommodations impose a serious and undue hardship. All such information shall be maintained by the employer on a confidential basis.

## **Training**

All university personnel involved in the recruitment, screening, selection, promotion, disciplinary and related processes will be trained in university policies and practices to ensure that the commitments outlined in this affirmative action plan are implemented. Such training will consist of on-line programs, programs offered through the internal GROW professional development program, sessions conducted by the Department of Human Resources, general orientation programs and others.

## **Responsibility for Implementation**

The Vice President of Human Resources will be designated as the director of affirmative action activities for disabled veterans, veterans of the Vietnam Era and other covered veterans. The Vice President's name will appear on internal and external communications regarding the University's Affirmative Action Program for Disabled Veterans, Veterans of the Vietnam Era, and Other Covered Veterans. The Vice President, with the assistance of the Affirmative Action Officer, will develop policy statements, affirmative action programs and internal and external communications related to this program.

## **Internal Dissemination of Policy**

The university has put into place internal written communication, practices and procedures designed to fully implement and communicate the institution's affirmative action program for disabled

veterans, veterans of the Vietnam era and other covered veterans. These communications include inclusion in all employee handbooks, official university policies, training programs geared toward supervisors and managers, new employee orientation programs conducted monthly by the Department of Human Resources, negotiated contracts with the union representing Marquette's custodial employees, and other methods of internally communicating the program to members of senior management and Marquette employees in general.

In addition the university, through the Department of Human Resources, will implement internal audit and reporting mechanisms designed to measure the effectiveness of the program, indicate and follow up on any identified need for remedial actions, assess the degree to which stated program objectives have been met, determine whether identified veterans are being offered the opportunity to participate in all university held educational, training, recreational and social activities and measure the university's overall compliance with the program's specific obligations. In the event deficiencies are identified they shall be addressed and remedied in an expedient manner.

### **External Dissemination of Policy**

In complying with and administering the goals and obligations of this program, the university will make serious good faith efforts to undertake appropriate outreach and proactive recruitment activities in an attempt to effectively recruit and retain qualified special disabled veterans, veterans of the Vietnam era and other covered veterans into its workforce.

The university will make every effort to carry out some, but not necessarily all, of the following activities in doing so:

- 1.) Enlist the assistance of local representatives from the Department of Veteran's Affairs as well as local veteran's groups in the recruitment of, and on-the-job training of, qualified veterans for jobs at Marquette.
- 2.) In recruiting efforts, incorporate special efforts to reach candidates who are special disabled veterans, veterans of the Vietnam era and other covered veterans.
- 3.) Practice positive outreach to any and all possible resource organizations, including veterans groups, for support and assistance in the university's efforts to recruit and hire qualified veterans.
- 4.) In making hiring decisions, the hiring manager or supervisor will consider applicants who are known special disabled veterans, veterans of the Vietnam era or other covered veterans for all available positions for which they may be qualified, whether a specific position is available or some other position exists for which they may qualify.
- 5.) Other proactive outreach measures as possible to assist with the recruitment of qualified applicants to open job positions at Marquette under this program.

## **HOW TO FILE AN EMPLOYMENT OR SERVICE DELIVERY DISCRIMINATION COMPLAINT**

If you feel that you have been treated differently because of your age, race, religion, color, sex, national origin or ancestry, disability or association with a person with a disability, arrest or conviction record, sexual orientation, marital status or pregnancy, political belief or affiliation, a military participation, or use or nonuse of lawful products off the employers or service providers premises during working hours, you may file a complaint. If you were wrongfully denied services, or if the treatment you received was separate or different from others, or if the program was not accessible to you, it may be discrimination.

**IMPORTANT:** If your application for service was not taken or you were told you were not eligible for a particular program BUT you feel you are eligible, ask the provider for a pamphlet which explains how to request a local agency appeal process or State administrative hearing review. Your right to this review or hearing does not need to be connected to a discrimination complaint.

You may file an informal discrimination complaint with your employer or service provider, or you may file a formal discrimination complaint with a state or federal agency. No one may threaten or harass you for making a complaint. No one may threaten or harass your witnesses because they are willing to say that they saw, heard or experienced.

All formal complaints must be filed within 180 days of the event or treatment you feel was discrimination. However, you should file the complaint as soon as possible after the action took place. IF you file an informal complaint and you are not satisfied with the resolution, you can still file a formal complaint as long as you do it within filing time frame. Do not wait until after the filing deadline to get an answer to the informal complaint if you plan to make a formal complaint.

To file an informal discrimination complaint with your provider or employer, request a discrimination complaint form by calling Ms. Lynn Mellantine, the university's Affirmative Action Officer/EEO Coordinator, at (414) 288-3430, located in the Department of Human Resources, Straz Tower #185.

Send the completed form back to the university's Affirmative Action Officer/EEO Coordinator. His or her name should be on this form.

If you wish to file a formal discrimination complaint, you may send the completed complaint form directly to the appropriate state or federal agency listed on the following pages. Include a letter stating that you are making a formal complaint to their agency as the funding source. Staff of the state or federal agency will provide the results to you within 90 days.

**File Formal Discrimination complaints about these services with the agencies listed below.**

<b>PROGRAM</b>	<b>AGENCY</b>
Wisconsin Works (W-2), Child Support, Emergency Assistance, Food Stamp Employment and Training, Learnfare, Day Care, Community Service Jobs, (W-2) Transitions, Job Access Loans, Refugee Services.	Wisconsin Dept. of Workforce Development Division of Workforce Solutions ATTN: Equal Opportunity Officer P.O. Box 7972 Madison, WI 53707-7972 V/TDD 608-266-6889
Unsubsidized and Trial Jobs Complaints. Any employment condition as an employee of DWD funding.	Equal Rights Office P.O. Box 8928 Madison, WI 53708 Telephone: 608-266-6860 TDD-Hearing Impaired 608-264-8752
	Equal Rights Office 819 North Sixth Street, Room 255 Milwaukee, WI 53203 Telephone: 414-227-4384, TDD-414-227-4081
Medical Assistance Service, Women Infants and Children, Food Stamps, BadgerCare, Senior Care, Child Placement Services, Medicaid, Community Aid, and other programs administered by the WI Dept. of Health and Family Services.	Wisconsin Dept. of Health and Family Services Division of Management and Technology Office of Civil Rights Compliance 1 W. Wilson, Room 561 P.O. Box 7850 Madison, WI 536707 Voice 608/266-9372, TDD 608/266-2555
<b>You also have the right to file a formal complaint with a federal agency.</b>	
Formal Discrimination Complaint about any of the above services administered by the WI Dept. of Health and Family Services.	U.S. Dept. of Health and Human Services Office for Civil Rights Region V, 233 N. Michigan Ave. Chicago, IL 60601 Telephone: 312-886-2359, TDD: 315-353-5693
Formal Discrimination Complaint about any program.	U.S. Dept of Justice Civil Rights Division 10 <sup>th</sup> and Pennsylvania Ave., NW Washington, D.C. 20530 Telephone: 202-514-0301, TDD 800-800-3302

<p>Formal Discrimination Complaint for Food Stamps.</p>	<p>Administrator, Food and Nutrition Service 3101 Park Center Drive Alexandria, VA 22302</p> <p>Food and Consumer Services Civil Rights Program U.S. Department of Agriculture 77 Jackson Boulevard, 20<sup>th</sup> Floor Chicago, IL 60604 Voice 312-353-1457</p> <p>U.S. Equal Employment Opportunity Commission 310 W. Wisconsin Ave., Suite 800, Milwaukee, WI 53203 Telephone: (414) 297-1111, TDD (414) 297-1115</p> <p>The Office of Federal Contract Compliance U.S. Department of Labor 230 South Dearborn Street Chicago, IL 60603 Telephone: (312) 353-2158, TDD (312) 353-2158</p>
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**SERVICE DELIVERY OR EMPLOYMENT DISCRIMINATION COMPLAINT**

**If you need help completing this form please contact:**

Equal Opportunity Coordinator	Phone (Voice)	Phone (TDD)
Lynn Mellantine	(414) 288-3430	( ) -

Name of Complainant	Phone number ( ) -
Address (number, street, city, state, zip code)	

**Basis for Service or Employment Discrimination Complaint** (such as: age, race, religion, color, sex, national origin or ancestry, disability or association with a person with a disability, arrest or conviction record, sexual orientation, marital status or pregnancy, political belief or affiliation, military participation, or use or nonuse of lawful products off the employers or service providers premises during working hours).

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Name of the Agency and/or Employee or Employer Against Whom the Complaint is Filed.
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Describe the action or treatment that you think was discriminatory. Include information about who, what, when, where, how, why, and the names, addresses and phone numbers of any witnesses, if you know them. Please be specific about the date of the last incident. You may write this on another sheet of paper if you need more room. In the space below, please say how many pages are attached if you need to add pages.
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Description of the Relief or Satisfaction you Want
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Signature of Complainant or Complainant Representative	Date Signed
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The information below is to be completed by the person at the agency who receives your complaint, looks into it and responds to you.

**Informal Complaint**

Date Received	Received By	Title
Agency		

Actions and Individual(s) to be Investigated
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Findings (Must be completed within 30 days)
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Action Taken
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Further Action Required? <input type="checkbox"/> Yes <input type="checkbox"/> No    If yes, what action is recommended?
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ENGLISH DISCRIMINATION COMPLAINT FORMS  
DWSD-13005-E (R. 11/2003)