

University of Houston Victoria

Affirmative Action Program 2003-2004

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**Executive Order 11246 Affirmative Action
Program for Minorities and Women**

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UNIVERSITY OF HOUSTON

VICTORIA

AFFIRMATIVE ACTION PROGRAM 2003-2004

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Section I. Designation of Responsibility

The President of the University of Houston – Victoria (UHV) delegates the authority to the Director of Human Resources/Affirmative Action for the overall design, monitoring, and reporting of the Affirmative Action Program. This responsibility includes:

- 1) Updating annually, the UHV Affirmative Action Program.
- 2) Performing analysis of the workforce by organizational unit and job group to determine whether or not there are problems with minority and/or female utilization.
- 3) Performing analysis of applicant flow, hires, terminations, promotions and other personnel activities to determine whether there are selection disparities.
- 4) Performing an analysis of UHV's compensation system to determine whether there are gender or race based disparities.
- 5) Performing analysis of UHV's selection, recruitment, referral and other personnel procedures to determine whether they result in disparities in the employment or advancement of minorities or women.
- 6) Developing and implementing monitoring and reporting system with all levels of management and advising top management of program effectiveness.
- 7) Submitting recommendations to improve unsatisfactory performance, if it occurs.
- 8) Serve as liaison between UHV and AA/EEO enforcement agencies.

Affirmative action procedures for staff recruitment, selection, hiring, promotion, transfer, compensation, and termination, including staff employees of academic departments, are carried out by the Department of Human Resources (HR) together with the affected department. As described below, certain affirmative action procedures are embedded in the University's standard employment practices. HR also provides training for its managers on relevant changes with respect to the latest developments in EEO.

The document itself is presented annually to senior management. This annual presentation serves as notice to department managers of their affirmative obligations with respect to filling vacancies by hire or promotion within the forthcoming year. Since job groups run across departments, a particular goal may affect many different departments.

The Director of Human Resources is responsible for: policy development, problem area identification, management consultation, management training of recent developments in EEO, and compliance with federal, state, and local laws and regulations along with university policies relating to EEO/AA.

Section II: Workforce Analysis

This workforce analysis is based on payroll data records as of May 1, 2003. On that date the University's database reported 237 benefits-eligible employees.

The University, pursuant to 60-2.17 (b) (1), has reviewed the workforce by organizational unit and determined that no problems exist in terms of minority or female in a unit of minority or female distributions in different jobs within a unit. For each job title, the workforce analysis indicates the following: total number of incumbents, the total number of male or female incumbents, and the total number of male and female incumbents in each of the following groups: Black, Asian/Pacific Islander, Hispanic and American Indian/Alaska native.

Section III: General EEO Job Categories

The University of Houston – Victoria utilizes five EEO categories. The categories are:

H10 – Executives and Administrators

H20 – Faculty

H30 – Professional Staff

H40 – Office and Clerical Staff

H70 – Public Safety Staff & Service Workers and Semi-Skilled Worker

H10 Executives and Administrators

Includes persons whose assignments require primary responsibility for management of the institution. Incumbents exercise a large amount of discretion and independent judgment. This category includes President, Vice President, Associate Vice President, and Executive Director.

H20 Faculty

Includes persons whose specific assignments are to conduct instruction and research and who hold academic-rank titles of Dean, professor, associate professor, assistant professor, instructor, or lecturer or equivalent.

H30 Professional Staff

Includes persons whose assignments require either a college degree or experience of such kind and amount as to provide a comparable background.

H40 Office and Clerical Staff

Includes persons whose assignments are typically associated with clerical activities.

H70 Service Workers and Semi-skilled Crafts

Includes persons who perform both protective and non-protective service. This includes those with formalized training, police officers and detectives and those without formalized training, custodial and grounds.

Section IV: Placement of Incumbents in Job Groups

The General EEO Job Categories are separated into job groups. Jobs with similar content, wage rates and opportunities are combined to create the job groups. Similarity of content refers to the duties and responsibilities of the job titles within the job group. Similarity of opportunities refers to training, transfers, promotions, pay, mobility, and other career enhancement opportunities offered by jobs within the job group.

The following is a list of the job titles that comprise each Job Group:

100 Executive Administrators

President	Vice President
Provost and Vice President for Academic Affairs	Associate Vice-President
	Executive Director

210 Tenured Faculty, Arts & Sciences

Professor	Associate Professor
Dean	

211 Tenured Track Faculty, Arts & Sciences

Assistant Professor

212 Non-Tenured Track Faculty, Arts & Sciences

Visiting faculty

220 Tenured Faculty, Business Administration

Professor	Associate Professor
Dean	

221 Tenured Track Faculty, Business Administration

Assistant Professor

222 Non-Tenured Track Faculty, Business Administration

Visiting faculty

230 Tenured Faculty, Education

Professor	Associate Professor
Dean	

231 Tenure Track Faculty, Education

Assistant Professor

232 Non-Tenured Track Faculty, Education

Visiting faculty

301 Directors & Associate Directors

Director	Manager
Associate Director	Registrar
Comptroller	Applications Programmer
Network Administrator	Systems Administrator

302 Managers & Supervisors

Librarian	Manager
Executive Associate	Reference Librarian
Program Coordinator	Senior Administrative Assistant
Senior Accountant	

303 Computer Professionals

Academic Computing Services Manager	Network Specialist
PC Network Specialist	PC Training Specialist
Telecommunications Specialist	Web Developer

304 General Professionals

Communications and Marketing Specialist	Accountant
Assistant Registrar	Administrative Assistant
Bursar	Certification Analyst
Coordinator	Multimedia Specialist
Payroll/Benefits Manager	Program Coordinator
Reference Librarian	Specialist
Special Collections Librarian	

305 Coordinators

Community Relations Coordinator	Coordinator, Certification and Records
Coordinator, Community & Prof Devo	Coordinator, Student Recruitment
Coordinator, Academic Center	Coordinator, Development
Coordinator, Student Services	Grants Coordinator
Program Coordinator	Projects Coordinator
Coordinator, Prof Advancement	Counselor, LEAD Ambassador

401 Administrative Secretaries & Counselors

Admin Secretary	Degree Plan Counselor
Financial Aid Counselor	Library Associate

402 Secretarial & Office Support

Accounting Analyst	Accounting Clerk
Admissions Analyst	Business Asst
Buyer	Community Relations Asst
Facilities Events Asst	Help Desk Clerk
Human Resources Asst	Instructional Support Asst
LEAD Asst	Library Asst
Library Media Tech	Night Clerk
Mail Services Clerk	Office Asst
On-Line Support Technician	Purchasing Asst
Payroll Clerk	Receptionist
Secretary	Senior Secretary
Staff Asst	Student Recruitment/Relations Asst
Student Receivables Asst	

702 Facilities Supervisors

Building Supervisor	Custodial Supervisor
Grounds Supervisor	Facilities Supervisor

703 Custodial, Grounds and Maintenance Staff

Groundskeeper	Custodian
Maintenance Tech	Sr. Maintenance Tech
Groundskeeper	

Section V: Job Group Analysis

As of May 2003 the University's Job Group Analysis included 237 benefits-eligible employees. The University has reviewed the workforce by job group and determined that no problems exist in terms of minority or female employment in any job group. The University has established placement goals for job groups where incumbent minority or female employment is significantly less than that of estimated availability.

The Job Group Analysis Summary listed on the following pages state the percentages of women and minorities within each job group.

Section VI: Determining Availability

A. Consideration of Availability Factor

In determining the availability of minorities and women, the University considered two factors:

1. The percentage of minorities and women with requisite skills in the reasonable recruitment area and
2. The percentage of minorities and women among those promotable, transferable and trainable within the University.

B. Determination of Reasonable Recruitment Area

The University has identified the actual recruitment area for each job group and considered additional possible recruitment areas. Based upon that consideration, it was determined that the reasonable recruitment area for each job group, i.e. that area from which the University reasonably seeks workers to fill positions in a particular job group.

The following reasonable recruitment areas were identified for each job group:

Job Group	Reasonable Recruitment Area
101 Academic Executive Administrators	1990 Census Population; EEO File; USA
210 Tenure Faculty, Arts & Sciences	1990 Census Population; EEO File; USA
211 Tenure Track Faculty, Arts & Sciences	1990 Census Population; EEO File; USA
212 Non-Tenure Track Faculty, Arts & Sciences	1990 Census Population; EEO File; Victoria, TX MSA
220 Tenure Faculty, Business Administration	1990 Census Population; EEO File; USA
221 Tenure Track Faculty, Business Administration	1990 Census Population; EEO File; USA
222 Non-Tenure Track, Business Administration	1990 Census Population; EEO File; Victoria, TX MSA
230 Tenure Faculty, Education	1990 Census Population; EEO File; USA
231 Tenure Track Faculty, Education	1990 Census Population; EEO File; USA
232 Non-Tenure Track Faculty, Education	1990 Census Population; EEO File; Victoria, TX MSA
301 Directors & Associate Directors	1990 Census Population; EEO File; Texas
302 Managers & Supervisors	1990 Census Population; EEO File; Texas
303 Computer Professionals	1990 Census Population; EEO File; Texas
304 General Professionals	1990 Census Population; EEO File; Victoria TX MSA
305 Coordinators	1990 Census Population; EEO File; Victoria TX MSA
401 Administrative Secretaries & Counselors	1990 Census Population; EEO File; Victoria TX MSA
402 Secretarial & Office Support	1990 Census Population; EEO File; Victoria TX MSA
701 Facilities Supervisors	1990 Census Population; EEO File; Victoria TX MSA
702 Custodial, Grounds & Maintenance	1990 Census Population; EEO File; Victoria TX MSA

C. Determination of Feeder Job Pools

Based upon actual patterns of promotions and transfer, we have identified the job groups that are “feeder pools”. The following table identifies the “feeder pools” for each job group.

Job Group	Feeder Pool Job Groups
210 Tenure Faculty, Arts & Sciences	211 Tenure Track Faculty, Arts & Sciences
220 Tenure Faculty, Business Administration	221 Tenure Track Faculty, Business Administration
230 Tenure Faculty, Education	232 Tenure Track Faculty, Education
301 Directors & Associate Directors	302 Managers & Supervisors
302 Managers & Supervisors	304 General Professionals
304 General Professionals	305 Coordinators
305 Coordinators	401 Administrative Secretaries &
401 Administrative Secretaries & Counselors	402 Secretaries & Office Support
	402 Secretarial & Office Support

D. Requisite Skill Census Data

To determine the percentage of minorities and women with requisite skills in the reasonable recruitment area, the University used 1990 US Census data file, which contains data on 512 individual occupational classification categories.

E. Requisite Skill Data and Composite External Availability

The University separately determines the availability for each job title within each job group. The University has determined the composite availability for the job group by weighting the availability for each job title by the proportion of the job group incumbents employed in that job group and adding weighted availability estimates for all job titles within the job group.

F. Calculating Final Availability

The University reviewed historical patterns of hiring and promotion/transfer into each job group. The University has assigned a weight to each job group based upon its study of the sources of employees hired or promoted/transferred in that job group. By multiplying the weight factor for each factor times the availability for that factor the final availability estimate is determined for each job group.

Section VII: Comparing Incumbency to Availability

A. General Description

The University of Houston - Victoria campus employs 237 benefits-eligible. The percentage of minorities and women within each job group was compared to the availability estimates from the 1990 US Census. When the percentage of minorities or women employed within a particular job group is less than reasonably would be expected given by their availability for employment the University established a Placement Goal. The standard used to compare employment data with the census data is two standard deviations.

The workforce figures are as of May 1, 2003. Hiring figures cover the twelve-month year April 31, 2002 – May 1, 2003.

B. Faculty

The faculty utilization analysis covers tenure, tenure-track and non-tenure track, including adjunct and visiting faculty.

The detailed analysis (found on the next several pages) displays the various job groups based on their tenure status utilizing the Two Standard Deviation Test in comparing the faculty with their respective US Census Code.

Tenure track faculty job groups feed the tenured faculty job group. It is reasonable to assume that the tenured faculty job group will achieve market availability once tenure track faculty receive tenure over the next few years.

On the other hand, the College of Business Administration have fewer females than would reasonably be expected in the tenure track faculty job groups. Since most of these positions are hired from external sources, continued recruitment efforts for women will be utilized within the College of Business Administration.

C. Staff

The present utilization analysis is calculated by job group. Each job group consist of job titles that are functionally related and that, when aggregated, are numerous enough to support a comparison with the external labor force figures. For staff positions ranging upward from blue collar through mid-level administrative and professional positions, the recruitment area is local, that is Victoria TX MSA and/or the State of Texas. Recruitment for top-level administrative positions is a mix of internal and national pools.

In reviewing and evaluating this numbers and the goals, it is important to note that 1990 Census figures were used as availability measures. The proportion of minorities and women in the labor force in positions higher than entry level increases year by year.

The detailed analysis (found on the next page) displays the various job groups. By utilizing the Two Standard Deviations Test in comparing the staff with their respective US Census Codes, availability of these professionals was compared to the actual UH numbers to create a utilization analysis. There were no staff job groups with lower incumbency than estimated availability for minorities or women.

Section VIII: Annual Placement Goals

Annual placement goals are established if the percentage of minorities or women employed in a particular job group is less than would reasonably be expected, given their availability percentage in a particular job group. This placement goal is equal to the availability percentage for minorities or women appropriate for that job group.

Annual Placement Goals apply to movement into a particular job group, whether from a new hire or from internal promotion/transfer from another job group. The University will continue to make a good faith effort to attain its Annual Placement Goals through implementation of the action-oriented programs described in the Affirmative Action Program.

The following the principles apply to establishing the Annual Placement Goals:

- 1) Annual Placement Goals are not rigid or inflexible quotas;
- 2) Annual Placement Goals do not set a ceiling or a floor for the employment of particular groups;
- 3) Annual placement Goals do not justify and will not be used to extend a preference to
any person, select a person or adversely affect any person's employment status on the basis of that person's race, color, religion, sex or national origin;
and
- 4) Annual Placement Goals do not create set-asides for specific groups and are
not
intended to achieve proportional representation or equal results.

The University will continue to not discriminate against any applicant or employee because of race, color, religion, sex or national origin.

Section IX: Problem Area Analysis

A. Analysis of Workforce by Organizational Unit

The University has reviewed the workforce by organizational unit, as set forth in the Workforce Analysis, to determine if problems exist in terms of minority or female employment in any unit or of minority distribution in different jobs within any unit. No problems were discovered. The Annual Placement Goals can adequately address issues with respect to employment in, or distribution within, organizational units.

B. Analysis of Workforce by Job Group

The University has reviewed the workforce by job group to determine if problems exist in terms of minority or female employment in any job group. The University has determined that no problems exist. The University has established annual placement goals for job groups where incumbent minority and/or female employment is significantly less than estimated availability for those particular groups.

C. Analysis of Personnel Activity

1. Analysis of Applicant Flow and New Hires by Job Group

The University has performed a statistical comparison of minority and gender composition of applicants and new hires by job group and found no significant disparities. The statistical comparison of applicant flow and new hires is set forth in the following pages. Problems identified in the analysis can be remedied through good faith employment practices.

Staff

Staff hiring data was collected over the past year from May 2002 through May 2003. The total staff hires for that period was 19. An analysis of the hiring data reveals that no significant problems exist, which cannot be adequately addressed by the Annual Placement Goals.

Faculty

Faculty hiring data were collected from the same time period as staff hiring data. The total number of faculty hires was 5. An analysis of the hiring data reveals that no significant problems exist, which cannot be adequately addressed by the Annual Placement Goals.

2. Analysis of Terminations by Job Group

The University performed a statistical comparison of the minority and gender compositions of employees who were involuntarily terminated and the job groups from which they were terminated and found no significant disparities.

There are two basic types of terminations, voluntary and involuntary. Voluntary terminations include resignations and retirement. Two weeks' notification is expected from employees who voluntarily terminate employment.

An involuntary termination generally involves the dismissal of an employee due to unsatisfactory job performance or misconduct. Certain rule infractions may justify immediate termination. Such terminations include: dishonesty, theft, gambling, consumption of alcohol while on duty, reporting for duty under the influence of drugs or alcohol, which may impair the ability to perform assigned duties, commission of a felony offense, fighting or other acts of violence, or the falsification of information on an employment application or resume or any other university record. This is not a complete list; it is meant to represent serious offenses for which immediate termination may be instituted.

A non-probationary employee normally receives an oral warning or counseling, a written reprimand, and a suspension without pay prior to being terminated for continued rule or policy violation. A supervisor may skip one or more of these steps depending on the seriousness of the infraction or if there are grounds for immediate termination. If a non-probationary employee is terminated, he or she may request a post-dismissal appeal hearing within five working days of receipt of the notice by the dismissed employee. The panel reviewing the termination consists of peers of the terminated employee. The recommendation of the panel is forwarded to the appropriate vice president for a decision. Both the dismissed employee and the dismissing department head have the right to appeal to the President.

The University's Director, Human Resources/Affirmative Action approves, in advance, all non-probationary and non-probationary terminations. The University's discipline policy requires consistent and progressive action, whether it involves formal disciplinary action or a termination.

3. Analysis of Promotions by Job Group

Currently, there are several established procedures for staff promotions on the University of Houston - Victoria campus. However, all these procedures require that an employee apply for a vacant position and compete with external candidates; as such, the promotion is actually a hiring decision. Thus, the analysis is completed in Section C. 1. Applicant Flow and New Hires by Job Group section.

One may be considered for promotion when a vacancy occurs within the employee's immediate department. Although current university policy does not give specifically preferential treatment for hiring to internal candidates, they may well have more appropriate experience and familiarity with the departmental operation than an outside candidate and therefore, be stronger candidates. The university strongly supports internal hires as a preferred method of filling vacancies. Surveys have shown that this hiring concept tends to build loyalty and confidence in the organization and its management.

Employees can also pursue advancement with other departments on campus. Employees are encouraged to explore vacancies that offer financial advancement.

Finally, promotional opportunity occurs when an employee assumes a significant increase in duties and responsibilities, which warrants a reclassification of the position. All requests for changes and classification require written justification, prior review by Human Resources and approval of the Budget Committee.

UHV's compensation program has built-in career ladders to advance promotional opportunities for staff. However, at this time, staff employees wishing for a promotion must compete with external candidates for those positions. As the applicant pool is a hybrid, made up of internal and external candidates, staff promotional opportunities cannot be analyzed.

The faculty does not have such promotional opportunities. Faculty promotions are defined as the advancement to a higher rank based on individual merit and job performance. These recommendations are made once a year, to be effective at the beginning of the succeeding year. Promotion from assistant to associate professor normally carries with it the award of continuous tenure. Until tenured, faculty serve on a probationary basis.

Promotions are awarded by the Board of Regents, and tenure is awarded by the Chancellor, under authority delegated by the Board of Regents, in both cases upon the successive recommendation of the school Dean, the University Promotion and Tenure Committee, the Provost, and the President. These recommendations result from an

assessment of the individual's academic achievement and an estimate of future achievement.

Tenure awarded at the University of Houston-Victoria does not entail tenure at any other university of the University of Houston System. Tenure is awarded on the basis of teaching, research, and service excellence to date, consistent with the mission of the University, and implies a high degree of confidence in the continuation and enhancement of this performance for the benefit of the university. An affirmative decision represents a positive judgment that the individual has contributed and will contribute to the development of excellence in the academic programs at the University of Houston - Victoria, particularly within the context of the individual's school.

The basic criteria and standards for promotion and tenure of the University of Houston - Victoria reflect a commitment to academic excellence. It is the expectation that faculty members shall meet the highest standards of their disciplines within the domains of teaching, scholarship, and service. Specifically, candidates for promotion are to demonstrate that they are effective teachers, that they have advanced their respective disciplines and that such advancements have been communicated to their peers in a manner appropriate to the specific discipline, and that they have contributed professional service to their institution, profession, and community.

In FY03, four individuals were considered for promotion from Assistant Professor to Associate Professor, with tenure. Three received promotions and tenure. Of the four individuals considered, one Asian male did not receive promotion and tenure.

4. Analysis of Other Personnel Actions

The University has reviewed other various personnel activities including: faculty recruitment and selection procedures, Human Resources vacancy posting procedures, process for conducting background criminal history checks for employees and revised personnel policies and procedures and found no problems.

D. Analysis of Compensation System

The University reviewed its compensation practices regarding starting pay and pay increases. The review indicated that no specific problems were found to exist within our workforce.

E. Analysis of Selection, Recruitment, Referral and Other Personnel Procedures

The University of Houston-Victoria is committed to equal opportunity and affirmative action in all employment practices, including recruitment and selection of staff. It is the policy of the University of Houston- Victoria that recruitment and selection of candidates for vacant positions will be conducted in accordance with applicable statutes, regulations, and policies of the University, and be consistent with the principles of equal employment and affirmative action.

The University provides adequate notice of all staff vacancies to current employees and other interested parties outside the University community, in order to ensure the widest possible dissemination. Only in unusual or hardship cases will a "waiver of posting" be permitted. For staff positions all requests for posting waivers must be approved by the Director for Human Resources/Affirmative Action. A waiver will be strongly considered if a strategic hire of a female or minority is made into a category identified as underutilized in the affirmative action plan.

The University of Houston –Victoria defines a regular staff employee as one who is appointed for at least 20 hours per week on a regular basis for at least 4.5 months, excluding students employed in positions that require student status as a condition for employment.

Job Descriptions

When a staff job vacancy occurs, the Director of Human Resources/Affirmative Action and the ultimate hiring supervisor review the existing job description for the position in question. The purpose of the review is to: 1.) determine whether the requirements of the job being filled are, in fact, accurately reflected in the job description and to make necessary corrections and/or changes where needed; 2.) ensure that the wage and salary classification and rate range is appropriate; and 3.) assure that the skill level, experience, and educational requirements are job-related and would not be expected to adversely impact minority or female candidates.

Screening and Referral

Applicant screening for skills, experience and education is conducted by the appointed search committee. Based upon the results of this credential evaluation, a qualified applicant pool is established. Candidates must meet or exceed the advertised minimum requirements of the posted vacancy in order to be considered in the applicant pool. When there is a qualified candidate within the hiring department, that person must submit the appropriate application, along with other internal candidates, and does not receive preferential consideration for the vacancy. Applicants who file an application for employment directly with the hiring department will be referred to the Department of

Human Resources to complete an application or submit a resume, before they become an official candidate for the posted vacancy.

Applicant referrals are made by Human Resources Department after a minimum ten (10) day posting period for both non-exempt and exempt vacancies. The Human Resources Department Secretary forwards to the hiring department applications and/or resumes for candidates who have applied for the job vacancy. The hiring supervisor responsible for making the hiring decision maintains contact with the Director, Human Resources/Affirmative Action during the referral stage, to insure that the review of credentials, selection of candidates for interviews and final determination of the best qualified candidate, is consistent with established employment practices.

The hiring department is responsible for scheduling all appointments for interviews with the candidates they determine to be the best match with the posted job requirements. The hiring department may also check references in order to further evaluate the candidates' qualifications. Once the hiring department has determined the best-qualified candidate for the vacancy, the hiring supervisor contacts the Director, Human Resources/Affirmative Action to discuss his/her decision and to determine the salary to be offered. All salary offers above the hiring rate range must be reviewed by the Director, Human Resources/Affirmative Action.

After the final decision is made, the hiring supervisor may make the official job offer. It is not required that the offer for employment be followed by an official appointment letter. It is the responsibility of the hiring department to notify all applicants who were interviewed of their non-selection. All supporting documentation related to the screening, referral, and hiring process should reflect that the job search was conducted in accordance with established University policies, and that the best qualified candidate was selected. All correspondence, including the applicant referral form, will be returned to the Human Resources Department for processing. The Human Resources Department will notify in writing all other candidates of non-selection.

Security Sensitive Positions

The University of Houston –Victoria has designated certain positions of special trust as Security Sensitive. Generally, these are positions in which employees have access to or control of activities, systems, and/or resources that are subject to misappropriation, malicious mischief, damage, and/or loss or impairment of communications or control.

Positions that may be designed as security sensitive are restricted to and identified as positions that:

- handle currency,
- have access to confidential information and/or have the capability to create, delete, or alter records in any of the university student, financial,

personnel, payroll, or related computer databases or in research databases that may contain trade secrets,

- have routine access to building master control and key systems,
- are responsible for the care or instruction of children, or
- work in an area designated as a security-sensitive area.

A job offer for a security sensitive position may not be extended to an applicant for a regular staff position until the criminal history record investigation is complete. If the final candidate is a current employee who is seeking a transfer or promotion, he or she will also be subject to a criminal history investigation. Applicants who have undergone a security sensitive check within a period of six (6) months will not have to undergo another check. Job announcements for all security sensitive positions will be clearly identified so applicants are fully aware that a criminal history investigation will be conducted. Applicants who decline to submit to a criminal history investigation or fail to provide required information will be denied employment in a security sensitive position.

Recruitment

Job vacancies for non-exempt staff positions are posted a minimum of ten (10) working days; exempt staff positions are posted a minimum of ten (10) working days. Position vacancies are posted on the Internet at the following website: www.uhv.edu/hr/index.htm.

Selected staff vacancies are also advertised in one or more of the following: The Victoria Advocate, The Chronicle of Higher Education, HigherEdJobs.com, appropriate professional journals. All ads in local, regional and national newspapers, and professional journals must be approved by the Director of Human Resources/Affirmative Action. All advertisements include the University's commitment statement to equal employment opportunity and affirmative action.

All recruitment includes the use of the Internet to attain worldwide exposure for current vacancies and the notification to numerous outside agencies and organizations that have the ability to contact and refer qualified minorities and/or women for employment.

The University has analyzed its selection, recruitment, referral and other personnel procedures to determine whether they result in disparities in the employment or advancement of minorities or women. The University found no significant impediments with regards to equal employment opportunities in any recruitment process.

F. Other Areas

The University has reviewed its employment practices for any other obstacles to achieving equal opportunity and affirmative action objectives and found no significant problems.

Section X: Development and Execution of Action Oriented Programs

Action oriented techniques utilized by HR to increase minority and female applicants are: to continue to develop a list of outside agencies and organizations with potential minority and female candidates; to encourage minority and female employees to refer applicants; to place women and minorities at all levels of the university hierarchy; and to continue to post vacancies with the Texas Workforce Commission.

The University ensures that job descriptions are consistent across campus. The Director of Human Resources/Affirmative Action in conjunction with an outside compensation consultant evaluates and grades positions based on job-duties, requirements and responsibilities. Job descriptions specify job requirements, i.e. education, experience, skills, abilities and physical requirements to preclude inadvertent discrimination in the recruiting, screening, and selection process. Official job descriptions are in the process of being posted on UHV's web site.

Section XI: Design and Implementation of Internal Auditing and Reporting Systems

As previously mentioned, the Director of the HR/AA is responsible for the auditing and reporting processes related to AA/EEO requirements. The HR/AA Director meets with hiring officials and administrators from areas that have annual placement goals to discuss their progress. Human Resources routinely reviews the University's selection, termination, compensation and promotion policies and procedures to ensure that they are nondiscriminatory.

The Director of the HR/AA has a direct reporting relationship line to the President of the University of Houston - Victoria to discuss all matters with respect to the effectiveness of AA/EEO programs and to provide recommendations for improvements, when necessary.

Reports to Federal External Agencies

Biennial IPEDS-S Reports -- According to Title VII of the Civil Rights Act of 1964, Section 709 (c), institutions of higher education are required to collect and maintain records necessary for the completion of the higher education staff reports (IPEDS-S), and to file, biannually, a copy of that report with the Equal Employment Opportunity Commission (EEOC).

Annual VETS-100 Report (52 FR 6674) – The Department of Labor requires all federal contractors holding contracts of \$50,000 or more to annually file a VETS-100 Report, no later than September 30.