



# AFFIRMATIVE ACTION PROGRAM FOR MINORITIES AND WOMEN



Portland  
State  
UNIVERSITY

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## **INTRODUCTION**

Portland State University (Portland State University) has prepared this Affirmative Action Plan (AAP) for the period of November 1, 2018 through October 31, 2019, reaffirming its commitment to the spirit and letter of affirmative action law, including those administered by the U. S. Department of Labor's Office of Federal Contract Compliance Programs (OFCCP). Through the implementation of this plan Portland State University continues its efforts to comply with appropriate government regulations and to make the best possible use of personnel while contributing to the betterment of society and the community.

In developing this plan Portland State University recognizes its duty to ensure equal employment opportunity. The following statement of policy reinforces that belief.

## **REAFFIRMING COMMITMENT TO EQUAL EMPLOYMENT OPPORTUNITY**

In setting forth this plan Portland State University reaffirms its belief in equal employment opportunity for all employees and applicants for employment in all terms and conditions of employment.

In 2017, Rahmat Shoureshi<sup>1</sup>, President of Portland State University, designated Yesenia Gutierrez as the Equal Employment Opportunity Administrator (EEO Administrator). Yesenia Gutierrez<sup>2</sup> oversees the plan development, modification, implementation, and reporting requirements and conducts management updates. The EEO Administrator also analyzes Portland State University's selection process in order to further the principles of equal employment opportunity.

As part of Portland State University's commitment to this overall process, it will seek to ensure affirmative action to provide equality of opportunity in all aspects of employment, and that all personnel activities, such as the recruitment, selection, training, compensation, benefits, discipline, promotion, transfer, layoff and termination processes remain free of illegal discrimination and harassment based upon race, color, religion, sex and national origin. Regular review by Portland State University, as described in this AAP, helps to ensure compliance with this policy.

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<sup>1</sup> Beginning in June 2019, Dr. Stephen Percy became the Interim President of Portland State University.

<sup>2</sup> Yesenia Gutierrez is no longer employed at PSU. Any questions may be directed to Julie Caron, Associate Vice President of Global Diversity & Inclusion.



## **INTERNAL DISSEMINATION OF EEO POLICY**

### **41 C.F.R. § 60-1.42**

Portland State University posts copies of the equal employment opportunity notices that comply with 41 C.F.R. § 60-1.42(a) in conspicuous places (including, where applicable, electronic websites) available to employees, applicants for employment, and (if applicable) representatives of each labor union or other organization representing its employees with which Portland State University has a collective-bargaining agreement or other contract or understanding. The following exemplify the methods and locations Portland State University may use in its ongoing efforts to ensure continuing dissemination of its policy and plan, although Portland State University may not always use each or any of the below methods, and it may use other methods not listed below:

1. Internal employee manuals contain the policy statement.
2. The policy statement is posted on bulletin boards accessible to employees.
3. Portland State University references the policy and progress in its annual report, newspaper, magazine and other publications.
4. Orientation meetings for new employees and in-house employment-related training include references to Portland State University's policy.
5. Portland State University publications, if any, including those with photographs, generally feature individuals of diverse gender, race, color, and national origin, where feasible.
6. Pertinent portions of Portland State University's Affirmative Action Plan are available during regular business hours for inspection by employees and applicants for employment.

## **EXTERNAL DISSEMINATION OF EEO POLICY**

### **41 C.F.R. § 60-1.41; 41 C.F.R. § 60-1.5**

1. 1. In solicitations or advertisements for employees placed by or on its behalf, Portland State University complies with at least one of the following methods regarding the dissemination of its equal employment opportunity clause:
  - a. Portland State University states expressly in the solicitations or advertising that all qualified applicants will receive consideration for employment without regard to race, color, religion, sex, or national origin. 41 C.F.R. § 1.41(a).
  - b. Portland State University uses display or other advertising that includes an appropriate insignia prescribed by the Deputy Assistant Secretary, subject to the provisions of 18 U.S.C. § 701. 41 C.F.R. § 1.41(b).

- c. Portland State University uses a single advertisement, and the advertisement is grouped with other advertisements under a caption which clearly states that all employers in the group assure all qualified applicants' equal consideration for employment without regard to race, color, religion, sex, or national origin. 41 C.F.R. § 1.41(c).
  - d. Portland State University uses a single advertisement in which appears in clearly-distinguishable type the phrase "an equal employment opportunity employer." 41 C.F.R. § 1.41(d). When pictures are included in these media, where feasible, efforts will be made to include pictures of individuals of diverse gender, race, and national origin.
2. The following exemplify the methods and locations Portland State University may use in its ongoing efforts to ensure continuing dissemination of its policy and plan, although Portland State University may not always use all of the below methods, and it may use other methods not listed below:
- a. Portland State University notifies subcontractors, suppliers and vendors of the policy about both its obligations to equal employment opportunity and about Portland State University's plan.
  - b. Portland State University advises recruitment sources, minority and female organizations, community agencies, leaders, secondary schools and colleges annually in writing of its commitment to this policy and plan. Portland State University informs these sources that job applicants will be treated fairly without regard to their race, color, religion, sex, and national origin.
  - c. Portland State University communicates with the state employment security office in writing regarding the policy.
  - d. Portland State University advises prospective employees of the existence of the AAP and makes pertinent portions of it available upon request, during regular business hours.
3. In addition, Portland State University incorporates by reference the equal employment opportunity and affirmative action clauses into each of its covered Government contracts and subcontracts, including Government bills of lading, transportation requests, contracts for deposit of Government funds, and contracts for issuing and paying U.S. savings bonds and notes and such other contracts and subcontracts as required by law, purchase orders, lease agreements, Government contracts, and other covered contracts (and modifications thereof if not included in the original contract) in accordance with 41 C.F.R. § 60-1.4 (a) – (c) (unless exempted under 41 C.F.R. § 60-1.5).

# **ESTABLISHMENT OF RESPONSIBILITY FOR IMPLEMENTATION OF THE PLAN**

## **41 C.F.R. § 60-2.17(a)**

### **A. Identification and Responsibilities of EEO/AA Administrator**

Overall responsibility for Portland State University's plan rests with the EEO Administrator, Yesenia Gutierrez. Yesenia Gutierrez ensures that the plan complies with all applicable laws, orders and regulations, including but not limited to, Executive Orders 11246, 13496, and their progeny. Specifically, Yesenia Gutierrez or the designated representative's duties include:

1. Developing, maintaining and, where appropriate, modifying Portland State University's plan to ensure compliance with the EEO/AA law.
2. Developing and, where appropriate, modifying procedures for effectively communicating the plan and its elements both internally and externally.
3. Advising management on EEO/AA progress, reporting potential EEO/AA problem areas, and assisting management in finding equitable solutions, where feasible, to any identifiable EEO/AA problem areas.
4. Evaluating the effectiveness of Portland State University's plan on a regular basis, and reporting to management.
5. Designing, implementing, and overseeing audit and reporting systems that periodically measures the effectiveness of the total affirmative action program. 41 C.F.R. § 2.17 (d)(1)-(4), identifying need for remedial action, and determining the degree to which objectives have been achieved.
6. Acting as University representative and liaison with any government agencies regarding this plan.
7. Monitoring University policies and procedures with regard to terms and conditions of employment to attempt to ensure compliance with affirmative action obligations.
8. Auditing the content of Portland State University's bulletin board and electronic policies, as appropriate, to ensure compliance information is posted and up to date.
9. Keeping management up to date on the latest developments in the areas of EEO and affirmative action.
10. Serving as a liaison between Portland State University and organizations, such as minority organizations and women's organizations.
11. When necessary, developing sales and management training programs to increase protected- group participation.
12. Assisting in the investigation, handling and disposition of employee harassment and discrimination complaints.

13. Discussing EEO/AA policies with all personnel, including management, to ensure that Portland State University's policies and the need for their support are understood at all levels.
14. Reviewing Portland State University's AAP for qualified women and minorities with all managers and supervisors to ensure the policy is understood and followed in all personnel actions.
15. Conducting periodic reviews of offices to ensure compliance in the areas of proper display of posters and notices, comparable facilities for both sexes, and opportunity for participation in University-sponsored recreational, educational and social activities.
16. Auditing training programs, hiring, and promotion patterns.

## **B. Management Responsibilities**

Line and upper management share responsibility for the plan, including but not limited to the following:

1. Assisting in auditing plan progress, including identifying problem areas, formulating solutions, establishing appropriate goals, and developing necessary training programs.
2. Reviewing the qualifications of applicants and employees to ensure qualified individuals are treated in a nondiscriminatory manner in hiring, promotion, transfers, and termination actions.
3. Making available career counseling, when appropriate.
4. Reviewing the job performance of each employee to assess whether personnel actions are justified based on the employee and his or her duties.
5. Reviewing position descriptions of the jobs in the manager's area or department to see that they adequately reflect the job to be performed.
6. Assisting subordinates and upper management in the prevention of harassment.

## **IDENTIFICATION OF AREAS FOR DISCUSSION**

### **41 C.F.R. § 60-2.17(b)**

Portland State University's commitment to fully implement this policy and plan include periodic reviews of mission critical workforce factors in a number of ways, including performing an in-depth analysis of its total employment process to determine whether and where impediments to equal employment opportunity exist. These analyses include:

1. The workforce by organizational unit and job group of minority or female utilization and distribution;
2. Personnel activity to determine whether there are selection disparities;
3. Compensation systems to determine if there are gender-, race-, or ethnicity-based disparities;
4. Selection, recruitment, referral, and other personnel procedures to determine whether they result in employment or placement disparities of minorities or women; and,
5. Any other areas that might impact the success of the affirmative action program. 41 C.F.R. § 2.17 (b)(1)-(5), including, for example, Portland State University's review of:
  - a. The workforce composition by race and sex to compare it to the availability of these groups;
  - b. Portland State University's applicant flow compared to the availability for the protected groups;
  - c. A comparison of hires to applicants pertaining to minorities and women;
  - d. Compensation system(s) to determine whether there are gender-, race-, or ethnicity-based disparities;
  - e. Selection forms, such as applications for employment, to ensure they comply with federal and state employment laws;
  - f. Processes to ensure there are no artificially-created barriers or restrictive seniority provisions; and,
  - g. Training opportunities to ensure they are available to minorities and women without restrictions based on race, color, sex, religion or national origin.

Identification of problem areas are discussed in the next section titled Narrative Discussion of Goals.

## **NARRATIVE DISCUSSION OF GOALS<sup>3</sup>**

The Portland State University plan has 3564 employees, including 830 minorities and 2052 females. The following goals exist for minorities and/or women:

- 0102 - Sr Administrators (IPEDS) - This group consists of 28 employees, of whom 8 are minorities and 9 are females. There is no need to set a placement goal at this time for minorities, but there is a goal of 55% for females.
- 0103 - Sr Manager (IPEDS) - This group consists of 53 employees, of whom 10 are minorities and 33 are females. There is no need to set a placement goal at this time for minorities or females.
- 0107 - Academic Chairs, Heads - This group consists of 49 employees, of whom 13 are minorities and 16 are females. There is no need to set a placement goal at this time for minorities or females.
- 0201 - Teaching, Rsch-Tenured - This group consists of 385 employees, of whom 95 are minorities and 158 are females. There is a goal of 33% for minorities and a goal of 54% for females.
- 0202 - Teaching, Rsch-Tenure Track - This group consists of 158 employees, of whom 54 are minorities and 88 are females. There is no need to set a placement goal at this time for minorities or females.
- 0203 - Teaching, Rsch-Fixed Term - This group consists of 364 employees, of whom 65 are minorities and 216 are females. There is a goal of 32% for minorities, but there is no need to set a placement goal at this time for females.
- 0251 - Part-Time Teaching, Research Faculty - This group consists of 762 employees, of whom 143 are minorities and 450 are females. There is no need to set a placement goal at this time for minorities or females.
- 0253 - Part-Time HRLY Research Faculty - This group consists of 51 employees, of whom 9 are minorities and 30 are females. There is no need to set a placement goal at this time for minorities or females.
- 0304 - Social/Mental Health Professional - This group consists of 16 employees, of whom 2 are minorities and 13 are females. There is no need to set a placement goal at this time for minorities or females.
- 0305 - Educ/Instruction Tech Specialists - This group consists of 31 employees, of whom 10 are minorities and 20 are females. There is no need to set a placement goal at this time for minorities or females.

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<sup>3</sup> Nine groups were removed from this report because the group contained less than 10 employees and the employees may then be identifiable.



- 0306 - Fiscal/Financial Support - This group consists of 80 employees, of whom 22 are minorities and 59 are females. There is no need to set a placement goal at this time for minorities or females.
- 0307 - Program Administrators - This group consists of 376 employees, of whom 92 are minorities and 271 are females. There is no need to set a placement goal at this time for minorities or females.
- 0308 - Academic Advisors/Counselors - This group consists of 118 employees, of whom 36 are minorities and 87 are females. There is no need to set a placement goal at this time for minorities or females.
- 0309 - Athletic Coaches, Trainers - This group consists of 33 employees, of whom 4 are minorities and 9 are females. There is a goal of 15% for minorities and a goal of 36% for females.
- 0311 - Academic Wages - Salaried - This group consists of 26 employees, of whom 7 are minorities and 12 are females. There is no need to set a placement goal at this time for minorities, but there is a goal of 66% for females.
- 0312 - Academic Wages - Hourly - This group consists of 194 employees, of whom 38 are minorities and 119 are females. There is no need to set a placement goal at this time for minorities or females.
- 0320 - Other Professional Support - This group consists of 95 employees, of whom 20 are minorities and 60 are females. There is no need to set a placement goal at this time for minorities or females.
- 0401 - Clerical, Secretarial: Lvl 1 - This group consists of 56 employees, of whom 9 are minorities and 37 are females. There is no need to set a placement goal at this time for minorities, but there is a goal of 78% for females.
- 0402 - Clerical, Secretarial: Lvl 2 - This group consists of 50 employees, of whom 17 are minorities and 31 are females. There is no need to set a placement goal at this time for minorities, but there is a goal of 93% for females.
- 0403 - Clerical, Secretarial: Lvl 3 - This group consists of 177 employees, of whom 42 are minorities and 137 are females. There is no need to set a placement goal at this time for minorities, but there is a goal of 88% for females.
- 0404 - Clerical, Secretarial: Lvl 4 - This group consists of 54 employees, of whom 22 are minorities and 37 are females. There is no need to set a placement goal at this time for minorities, but there is a goal of 92% for females.
- 0503 - Information Technology Consult - This group consists of 57 employees, of whom 15 are minorities and 18 are females. There is no need to set a placement goal at this time for minorities or females.

- 0504 - Operating Sysys/Network Analysts - This group consists of 35 employees, of whom 7 are minorities and 5 are females. There is no need to set a placement goal at this time for minorities, but there is a goal of 20% for females.
- 0505 - Analyst Programmer - This group consists of 54 employees, of whom 11 are minorities and 16 are females. There is no need to set a placement goal at this time for minorities or females.
- 0508 - Technical Specialist - This group consists of 43 employees, of whom 9 are minorities and 23 are females. There is no need to set a placement goal at this time for minorities or females.
- 0520 - Other Educational Professionals - This group consists of 44 employees, of whom 14 are minorities and 43 are females. There is no need to set a placement goal at this time for minorities or females.
- 0601 - Skilled Trades Specialist/Support - This group consists of 60 employees, of whom 18 are minorities and 2 are females. There is no need to set a placement goal at this time for minorities, but there is a goal of 4% for females.
- 0602 - Theatrical Stage Employees - This group consists of 11 employees, of whom 1 is a minority and 5 are females. There is a goal of 35% for minorities and a goal of 61% for females.
- 0701 - Service Workers - This group consists of 40 employees, of whom 20 are minorities and 16 are females. There is no need to set a placement goal at this time for minorities or females.
- 0703 - Police Officers - This group consists of 11 employees, of whom 4 are minorities and 1 is a female. There is no need to set a placement goal at this time for minorities, but there is a goal of 18% for females.

Portland State University will use alternate recruitment sources when necessary to attract more qualified external applicants. In those instances where statistical adverse impact is indicated, Portland State University will take action as outlined in the Action-Oriented Programs Section to monitor and eliminate any problem areas, as well as other similar actions.

## **DEVELOPMENT & EXECUTION OF ACTION-ORIENTED PROGRAMS**

### **41 C.F.R. § 60-2.17(c)**

Portland State University has instituted action-oriented programs designed to eliminate any problem areas, should they exist, in accordance with § 60-2.17(b), and to help achieve specific affirmative action goals. Portland State University also makes a good-faith effort to remove identified barriers, expand employment opportunities, and produce measurable results. These programs may include items such as:

1. Conducting periodic reviews of job descriptions attempting to ensure they accurately reflect job-related duties and responsibilities.
2. Annually reviewing job qualifications by department and job title for job-relatedness, and using job performance criteria.
3. Making job descriptions and qualifications available to recruiting sources and to all members of management involved in the recruiting, screening, selection, and promotion processes.
4. Making good-faith efforts to select the most qualified candidates regardless of race, color, national origin, religion or sex. Portland State University recognizes the duty, should the need arise, to make good faith efforts to remedy any statistically significant underutilization of minorities and women. Accordingly, Portland State University commits to evaluating the total selection process to ensure freedom from bias based on race, color, religion, sex, and national origin through:
  - a. Reviewing the job applications and other pre-employment forms to ensure information requested is job-related;
  - b. Evaluating selection methods that may have a disparate impact to ensure that they are job-related and consistent with business necessity;
  - c. Providing assistance, such as training and guidance on proper interviewing techniques and EEO training, to employees, management, and supervisory staff, including, but not limited to, those who are involved in the recruitment, selection, discipline and other related processes, so that personnel actions remain neutral to race, color, religion, sex and national origin; and
  - d. Reviewing selection techniques and employment standards.
5. Portland State University employs appropriate methods to attempt to improve recruitment and increase the flow of qualified minorities and women applicants in its recruiting process, including a number of the following actions:
  - a. Including the phrase, "Equal Opportunity/Affirmative Action Employer" in printed employment advertisements;

- b. Placing help-wanted advertisements, when appropriate, in local minority news media and women's interest media;
  - c. Disseminating information on job opportunities to organizations representing minorities, women, and employment development agencies when job opportunities occur;
  - d. Encouraging all employees to refer qualified applicants;
  - e. Actively recruiting in secondary schools, junior colleges, colleges and universities with predominantly minority or female enrollments where underutilization exists in such areas, and
  - f. Requesting employment agencies to refer qualified minorities and women.
  - g. Portland State University considers using special employment programs designed to deal with underutilization. Business conditions and other feasibility matters remain the key factor in any decision to develop/implement such programs.
  - h. Whenever feasible and appropriate, Portland State University participates in job fairs, career days, youth-motivation programs and other programs that foster exposure for qualified minorities and women.
  - i. Portland State University encourages minorities and women to participate in University-sponsored activities and programs.
  - j. Portland State University utilizes various community organizations and schools as referral sources.
6. Portland State University reviews promotion criteria and procedures so that job qualifications form the basis for the promotional decisions without regard to race, color, sex, religion, or national origin. Portland State University monitors promotion rates for minorities and women and, when necessary, may employ one or more of the following procedures:
- a. Maintaining an inventory of current minority and women employees to determine special job-related talents, skills and experience.
  - b. Providing job training, job-related courses or certificate programs.
  - c. Reviewing work specifications and job qualifications to ensure job-relatedness.
  - d. Reviewing promotion decisions for possible impact on women or minorities.
  - e. Conducting career counseling, where appropriate, during performance evaluations.
  - f. Informing employees about educational programs and other opportunities available to improve their employment prospects.
  - g. Reviewing seniority practices for possible impact on women and minorities.

- h. Reviewing University-sponsored social and recreational activities to ensure non-discriminatory participation and availability.
- i. Ensuring that all employees are given equal opportunity for promotion. This is achieved by:
  - 1. Generally posting or otherwise announcing most promotional opportunities.
  - 2. Offering counseling to assist employees in identifying promotional opportunities, training and educational programs to enhance promotions and opportunities for job rotation or transfer; and
  - 3. Evaluating job requirements for promotion.

## **INTERNAL AUDIT AND REPORTING SYSTEM**

### **41 C.F.R. § 60-2.17(d)**

1. Yesenia Gutierrez, Portland State University's EEO/AA Administrator, maintains an internal audit system to attempt to oversee Portland State University's Affirmative Action Plan and assess progress. The EEO Administrator is responsible for ensuring that the formal AAP documents are developed and prepared and for the effective AAP implementation; however, responsibility is likewise vested with each department manager and supervisor, depending upon the specific responsibility. The audit system is designed and implemented to measure the effectiveness of the total affirmative action program [41 C.F.R. § 2.17 (d)(1)-(4)], including:
  1. Monitoring records of all personnel activity, including: referrals, placements, transfers, promotions, terminations, and compensation, at all levels, to ensure the nondiscriminatory policy is carried out,
  2. Requiring internal reporting on a scheduled basis as to the degree to which equal employment opportunity and organizational objectives are attained,
  3. Reviewing reports at all levels of management; and
  4. Advising top management of the program's effectiveness and submitting recommendations to improve unsatisfactory performance. 41 C.F.R. § 2.17 (d)(1)-(4).
2. Portland State University reviews various employment decisions, such as job referrals, hiring decisions, transfers, promotions, and terminations. Portland State University maintains summary data where necessary and feasible, and conducts regular reviews at least annually.
3. There is no "de facto" (in practice without being officially established) segregation. Further, Portland State University ensures that facilities, as broadly defined in 41 C.F.R. § 60-1.8, provided for employees are provided in such a manner that segregation on the basis of race, color, religion, sex, or national origin cannot result, provided that separate or single-user restrooms and necessary dressing or sleeping areas shall be provided to ensure privacy between the sexes.
4. Portland State University complies with required records retention provisions set forth in 41 C.F.R. § 60-1.12 and elsewhere in the applicable OFCCP regulations, and maintains a) employment applications (generally for two years); b) summary data of applicant flow by identifying, at least, total applicants, total minority applicants, and total female applicants, where necessary and feasible, and conducts regular reviews at least annually; c) applicant flow showing the name, race, sex, date of application, job title, interview status, and the action taken for all individuals applying for job opportunities, and the relevant applicant/hire decisions; d) summary data of external job offers and hires, promotions, resignations, terminations, and layoffs by job group



and by sex and minority group identification; e) and records pertaining to its compensation system.

5. Provide needed reports to managers and supervisors regarding the results of the audit as well as Portland State University's overall progress in the area of EEO/AA. Any recommended actions should be made as well. Reports shall be made to senior management on at least an annual basis.

## **GUIDELINES FOR PREVENTION OF SEX DISCRIMINATION**

### **41 C.F.R. § 60-20.1 et seq.**

Portland State University supports the promotion and ensuring of equal employment opportunity of its employees and applicants without regard to sex, and endorses and complies with the following policy statements.

1. Portland State University employment advertisements do not express a sex preference nor does Portland State University place advertisements in columns designated "males" or "females", unless sex is a bona fide occupation obligation. 41 C.F.R. §60-20.2(a).
2. Employees of both sexes at Portland State University shall have an equal opportunity to any available job that he or she is qualified to perform, unless sex is a bona fide occupation obligation. 41 C.F.R. §60-20.2.
3. Portland State University maintains gender-neutral personnel policies that expressly indicate that there shall be no gender discrimination against employees. The terms and conditions of any written collective bargaining agreements shall not be inconsistent with these guidelines. 41 C.F.R. §60-20.3(a).
4. Portland State University makes no distinction based upon sex in employment opportunities, wages, hours, or other conditions of employment. 41 C.F.R §60-20.3(c).
5. Portland State University will not make any distinction between married and unmarried persons of one sex that is not made between married and unmarried persons of the opposite sex, or deny employment to women with young children unless it has the same exclusionary policies for men, or terminate the employment of an employee of one sex in a job classification upon reaching a certain age unless the same rule is applicable to members of the opposite sex. 41 C.F.R. § 60.20.3(d).
6. Portland State University has policies and practices to ensure appropriate physical facilities to both sexes. 41 C.F.R. § 60-20.3(e).
7. Portland State University will not deny a female employee the right to any job she is qualified to perform in reliance on a State "protective" law regarding, for example, prohibiting women from performing work such as a bartender, or for working at jobs requiring more than a certain number of hours or lifting above a certain weight. 41 C.F.R. § 60-20.3(f).
8. Portland State University endorses and complies with the 1978 Pregnancy Discrimination Act, as it amended Title VII of the Civil Rights Act of 1964. Portland State University applies any leave of absence policy uniformly, regardless of sex. 41 C.F.R. § 60-20.3(g).
9. Portland State University must not specify any differences for male and female employees on the basis of sex in either mandatory or optional retirement age. 41 C.F.R. § 60-20.3(h).

10. Portland State University's seniority lines and lists must not be based on sex. 41 C.F.R. § 60- 20.4.
11. Portland State University's wage schedules are not related to or based on the sex of an employee. 41 C.F.R. § 60-20.5(a). Further, Portland State University does not discriminatorily restrict one sex to certain job classifications, and instead must take steps to make jobs available to all qualified employees in all classifications without regard to sex. 41 C.F.R. § 60-20.5(b).
12. When appropriate, Portland State University makes affirmative efforts to increase the number and percentage of women in the workforce, including, but not limited to the following:
  1. Portland State University recruits women and encourages existing women employees to apply for positions historically labeled by society as "traditionally male".
  2. Portland State University guarantees equal, gender-neutral access to training and tuition reimbursement programs, including management training, and other types of workplace training programs.
  3. Portland State University informs management of its affirmative action responsibilities. 41 C.F.R § 60-20.6.

## **POLICY WITH RESPECT TO RELIGION/NATIONAL ORIGIN**

### **41 C.F.R. § 60-50.1 et seq.**

Pursuant to the guidelines prohibiting discrimination on the basis of religion or national origin, 41 C.F.R. § 60- 50.1, et seq., Portland State University hereby reaffirms that it does not discriminate against employees, or applicants for employment, because of religion or national origin. Portland State University takes affirmative action to seek to ensure that employees or applicants for employment are treated without regard to their religion or national origin in all aspects of the terms and conditions of employment, such as upgrading, demotion, transfer, recruitment, recruitment advertising, layoff, termination, rates of pay (or other forms of compensation), and selection for training.

Portland State University has reviewed its employment practices and determined that its employees, including those who belong to religious or ethnic groups, have received fair consideration for job opportunities. Based upon its review, and depending upon the circumstances, Portland State University will undertake appropriate actions, which may include one or more of the following activities:

1. Issuing a policy directive to employees reaffirming the Portland State University's obligation to provide equal employment opportunity without regard to religion or national origin. This policy will be communicated in such a manner as to foster understanding, acceptance, and support among executives, managers, supervisors, and other employees, and to encourage such persons to take the necessary action to aid Portland State University in meeting its obligations.
2. Developing internal procedures to seek to ensure that Portland State University's obligation to provide equal employment opportunity, without regard to religion or national origin, is being fully implemented. Specifically, employment activities are reviewed by the EEO Administrator.
3. Informing management annually of its commitment to equal employment opportunity, without regard to religion or national origin.
4. Enlisting the assistance and support of recruitment sources for this commitment.

Portland State University acknowledges its responsibility to make reasonable accommodations for the religious observances and practices of its existing or prospective employees under the terms of Title VII of the Civil Rights Act of 1964. An accommodation for religious purposes will be denied should Portland State University determine that it would have to suffer undue hardship. During this accommodation evaluation, the following factors will continue to be considered by Portland State University:

1. Business necessity;
2. Financial costs and expenses; and
3. Resulting personnel problems.

## **ORGANIZATIONAL PROFILE**

Contractors and subcontractors are required to include in their AAPs an organizational profile of their workforce using either a “workforce analysis” or “organizational display” that provides detailed data reflecting staffing patterns within the establishment. 41 C.F.R. § 60-2.11. An organizational profile shows the staffing pattern within a contractor’s establishment. This profile assists an employer in identifying where, in the workforce of its site which is the subject of this AAP, women or minorities are underrepresented or concentrated. A workforce analysis is used in this AAP, which lists each job title from the lowest paid to the highest paid within each department or similar organizational unit.