AFFIRMATIVE ACTION PROGRAMS

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Southwest Tennessee Community College

AFFIRMATIVE ACTION PROGRAM

for

PROTECTED VETERANS
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Southwest Tennessee Community College

AFFIRMATIVE ACTION PROGRAM FOR PROTECTED VETERANS

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I. Equal Employment Opportunity (EEO) Policy Statement (41 CFR 60-300.44(a))

The EEO Policy statement on the following page is posted on our college’s bulletin board along with our required employment posters and is viewable by both employees and applicants. The “EEO is the Law” poster is also available on our Careers Website for viewing by online applicants.
It is the policy of Southwest Tennessee Community College not to discriminate against any employee or applicant for employment because of his or her race, color, religion, sex, or national origin or because he or she is an individual with a disability or disabled veteran, Armed Forces service medal veteran, recently separated veteran, or active duty wartime or campaign badge veteran, or thereinafter referred collectively as "protected veterans." It is also the policy of Southwest Tennessee Community College to take affirmative action to employ and to advance in employment, all persons regardless of their status as individuals with disabilities or protected veterans, and to base all employment decisions only on valid job requirements. This policy shall apply to all employment actions, including but not limited to recruitment, hiring, upgrading, promotion, transfer, demotion, layoff, recall, termination, rates of pay or other forms of compensation and selection for training, including apprenticeship, at all levels of employment.

Employees and applicants shall not be subjected to harassment, intimidation, threats, coercion or discrimination because they have engaged in or may engage in any of the following activities: (1) Filing a complaint; (2) Assisting or participating in an investigation, compliance evaluation, hearing, or any other activity related to the administration of Section 503 of the Rehabilitation Act of 1973, as amended (Section 503) or any other Federal, State or local law requiring equal opportunity for individuals with disabilities; (3) Opposing any act or practice made unlawful by section 503 or its implementing regulations in this part or any other Federal, State or local law requiring equal opportunity for disabled persons; or (4) Exercising any other right protected by section 503 or its implementing regulations in this part.

As President of Southwest Tennessee Community College, I am committed to the principles of Affirmative Action and Equal Employment Opportunity. In order to ensure dissemination and implementation of equal employment opportunity and affirmative action throughout all levels of the college, I have selected Paul D. Thomas as the Human Resources and Affirmative Action Officer for Southwest Tennessee Community College. One of the Human Resources and Affirmative Action Officer's duties will be to establish and maintain an internal audit and reporting system to allow for effective measurement of Southwest Tennessee Community College's programs.

In furtherance of Southwest Tennessee Community College's policy regarding Affirmative Action and Equal Employment Opportunity, Southwest Tennessee Community College has developed a written Affirmative Action Program which sets forth the policies, practices and procedures that Southwest Tennessee Community College is committed to in order to ensure that its policy of nondiscrimination and affirmative action for qualified individuals with disabilities and qualified protected veterans is accomplished. This Affirmative Action Program is available for inspection by any employee or applicant for employment upon request between 9:00 AM to 4:00 PM in the Human Resources Department. Any questions should be directed to me, your supervisor, or Paul D. Thomas, Human Resources and Affirmative Action.

[Signature]

Nathan L. Essex
Southwest Tennessee Community College
November 1, 2014
II. Review of Personnel Processes (41 CFR 60-300.44(b))

Southwest Tennessee Community College periodically reviews personnel processes to determine whether its present procedures ensure careful, thorough, and systematic consideration of the qualifications of known protected veterans. This review covers all procedures related to the filling of job vacancies either by hire or by promotion, as well as all training opportunities offered or made available to employees.

In determining the qualifications of veterans, Southwest Tennessee Community College limits its consideration of a protected veteran's military record, including discharge papers, to only that portion of the record which is relevant to the specific job qualifications for which the veteran is being considered. The personnel processes do not stereotype protected veterans in a manner which limits their access to all jobs for which they are qualified.

Based upon Southwest Tennessee Community College's review of its personnel processes, Southwest Tennessee Community College will modify the personnel processes when necessary, and will include the development of new procedures in this Affirmative Action Program to ensure Equal Employment Opportunity. The following is a set of procedures which is used to meet the requirements of §60-300.44(b):

1. The application or personnel form of each known applicant who is a protected veteran is annotated to identify each vacancy for which the applicant was considered, and the form is quickly retrievable for review by the Department of Labor and the contractor’s personnel officials for use in investigations and internal compliance activities.

2. The personnel or application records of each known protected veteran includes (i) the identification of each promotion for which the protected veteran was considered, and (ii) the identification of each training program for which the protected veteran was considered.

3. In each case where an employee or applicant who is a protected veteran is rejected for employment, promotion, or training, the college prepares a statement of the reason as well as a description of the accommodations considered (for a rejected disabled veteran). The statement of the reason for rejection (if the reason is medically related), and the description of the accommodations considered, is treated as confidential medical records in accordance with §60-300.23(d). These materials are made available to the applicant or employee concerned upon request.
4. Where applicants or employees are selected for hire, promotion, or training and the college undertakes any accommodation which makes it possible for him or her to place a disabled veteran on the job, a record is made containing a description of the accommodation. The record is treated as a confidential medical record in accordance with §60-300.23(d).
III. Physical and Mental Qualifications (41 CFR 60-300.44(c))

The physical and mental job qualifications of all jobs are reviewed prior to a requisition being opened to determine whether or not they tend to screen out qualified disabled veterans. They are also reviewed as new jobs are established or job requirements are modified to ensure that, to the extent that such qualification requirements tend to screen out qualified disabled veterans, job qualifications are consistent with business necessity and the safe performance of the job.

No qualification requirements were identified which had a screening effect. All job qualification requirements were found to be job-related and consistent with business necessity and safety.

If Southwest Tennessee Community College ever applies physical or mental qualification standards in the selection of applicants or employees for employment or other change in employment status such as promotion, demotion or training, to the extent that qualification standards tend to screen out qualified disabled veterans, the standards shall be related to the specific job or jobs for which the individual is being considered and consistent with business necessity.
IV. Reasonable Accommodation to Physical and Mental Limitations (41 CFR 60-300.44(d))

As a matter of nondiscrimination, it is the college's policy to make reasonable accommodation to the known physical or mental limitations of an otherwise qualified disabled veteran unless it can demonstrate that the accommodation would impose an undue hardship on the operation of its business. As a matter of affirmative action, if an employee who is known to be a disabled veteran is having significant difficulty performing his or her job and it is reasonable to conclude that the performance problem may be related to the known disability, the manager or appropriate HR personnel will confidentially notify the employee of the performance problem and inquire whether the problem is related to the employee's disability. If the employee responds affirmatively, he/she will be asked whether a reasonable accommodation is needed.

Each applicant or employee is dealt with on an individual basis. Reasonable accommodations are made whenever possible and ongoing efforts include revision of facilities to make them accessible. The college makes every effort to provide suitable employment for those employees who become disabled while employed by us.
V. Harassment Prevention Procedures (41 CFR 60-300.44(e))

Employees and applicants of Southwest Tennessee Community College will not be subject to harassment, intimidation, threats, coercion, or discrimination because they have engaged or may engage in filing a complaint, assisting in a review, investigation, or hearing or have otherwise sought to obtain their legal rights related to any Federal, State, or local law regarding EEO for protected veterans. Any employees or applicants who feel that they have been subject to harassment, intimidation, threats, coercion, or discrimination because of their status as a protected veteran should promptly contact a manager in their chain of command, or promptly contact the Affirmative Action Officer for assistance.

This policy is posted for employees and applicants to view.
VI. External Dissemination of Policy, Outreach, and Positive Recruitment (41 CFR 60-300.44(f))

Southwest Tennessee Community College will undertake appropriate outreach and positive recruitment efforts in order to effectively attract protected veterans. In order to comply with the external dissemination of the affirmative action policy, the college notifies (via the use of purchase order, contract or Certificate of Compliance) all subcontractors, vendors and suppliers of Southwest Tennessee Community College's EEO and AA policy regarding its affirmative action efforts and requesting appropriate action on their part.

Examples of outreach and positive recruitment which the college utilizes throughout the year may include contacting the following:

1. All recruiting sources, including the employment agencies, educational institutions and social service agencies of the college's policy concerning the employment of protected veterans and have been advised to actively recruit and refer qualified persons for job opportunities;
2. Local Veterans' Employment Representative in the local employment service office nearest the office;
3. The veterans' counselors and coordinators on college campuses;
4. The service officers of the national veterans' groups active in the local area;
5. Local veterans' groups and veterans' service centers in the local area;
6. The Department of Defense Transition Assistance Program (TAP);
7. Any organization listed in the Employer Resources section of the National Resource Directory.

The college will also consider the following as part of outreach and recruitment efforts for protected veterans:

1. Consider holding formal briefing sessions to invite representatives from recruitment sources and placement agencies to tour the facility, discuss current and prospective position openings, job descriptions and required qualifications and explanations of the college's selection procedures.
2. Local job fairs sponsored by support groups for protected veterans.
3. Posting job openings with the Department of Veterans Affairs Regional Office nearest the establishment.
As part of the outreach and positive recruitment efforts for protected veterans, the college will:

1. Incorporate special efforts to reach students who are protected veterans whenever the college reaches out to educational institutions;

2. An effort will be made to participate in work-study programs with the Department of Veterans Affairs rehabilitation facilities which specialize in training or educating disabled veterans;

3. Establish meaningful contacts with appropriate veterans' service organizations which serve protected veterans for purposes as advice, technical assistance, and referral of potential employees. Technical assistance from the resources described in this paragraph may consist of advice on proper placement, recruitment, training and accommodations contractors may undertake, but no such resource providing technical assistance shall have authority to approve or disapprove the acceptability of affirmative action programs;

4. Make available protected veterans for participation in career days, youth motivation programs, and related activities in their communities;

5. Take positive steps to attract protected veterans not currently in the work force who have requisite skills and can be recruited through affirmative action measures. These persons may be located through the local chapters of veterans' organizations; In making hiring decisions, consider applicants who are known protected veterans for all available positions for which they may be qualified when the position(s) applied for is unavailable; and

VII. Internal Dissemination of Policy (41 CFR 60-300.44(g))

In an effort to promote positive Affirmative Action for qualified protected veterans, the college has developed internal communications that foster understanding, acceptance, and support among the college’s executive, management, and supervisory personnel. Additionally, all other college employees have been notified and encouraged to take the necessary action to aid the college in meeting its Affirmative Action obligations. The college has informed its employees and applicants for employment of its commitment to engage in Affirmative Action to increase the employment opportunities for qualified protected veterans.

The college realizes that a strong outreach program is ineffective without the adequate internal support from management personnel and other employees. In order to ensure greater employee cooperation and participation in the college’s Affirmative Action efforts, Southwest Tennessee Community College has adopted and disseminated an internal policy. This policy’s dissemination may include but is not limited to the following:

1. Copy of our AAP for Qualified Protected Veterans will be made available for inspection to any employee or applicant upon request to promote understanding, acceptance and support;
2. Policies are re-emphasized to managers and supervisors annually;
3. Southwest Tennessee Community College’s Affirmative Action policy and the EEO poster are posted on bulletin boards located throughout our facilities and work areas;
4. All employees who believe they are a protected veteran under the EEO provisions of VEVRAA, as amended, have been invited to identify themselves if they wish to benefit under this Affirmative Action Program. Such invitation has been posted on bulletin boards throughout the facility and work areas;
5. The policy is included in the college’s policy manual or otherwise made available to employees;
6. All employees and prospective employees are informed of the college’s commitment to engage in affirmative action to increase employment opportunities for protected veterans. The contractor periodically schedules special meetings with all employees to discuss policy and explain individual employee responsibilities;
7. The policy is publicized in the college newspaper, magazine, annual report and other media;
8. Special meetings with executive, management, and supervisory personnel are held to explain the intent of the policy and individual responsibility for effective implementation, making clear the chief executive officer's attitude;

9. The policy is discussed thoroughly in both employee orientation and management training programs;

10. Meet with union officials and/or employee representatives to inform them of the contractor's policy, and request their cooperation;

11. Articles on accomplishments of protected veterans are included in college publications; and

12. When employees are featured in employee handbooks or similar publications for employees, protected veterans are included.
**VIII. Audit and Reporting Systems (41 CFR 60-300.44(h))**

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

1. Measure the effectiveness of the college's programs;
2. Identify problem areas where remedial action is needed;
3. Determine the degree to which Southwest Tennessee Community College's AAP goals and objectives have been attained;
4. Determine whether known protected veterans have had the opportunity to participate in all college-sponsored educational, training, social and recreational activities;
5. Measure the compliance with the affirmative action program's specific obligation for protected veterans; and
6. Document the above mentioned activities.

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

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

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

1. The Human Resources and Affirmative Action Officer will discuss any problems relating to significant rejection ratios, EEO charges, etc., with management; and
2. The Human Resources and Affirmative Action Officer will report the status of the college's AAP goals and objectives to management. The Human Resources and Affirmative Action Officer will recommend remedial actions for the effective
implementation of the AAP.
IX. Responsibility for Implementation (41 CFR 60-300.44(i))

A. Responsibilities of the Affirmative Action Officer:

The Human Resources and Affirmative Action Officer is responsible for the overall execution, implementation and monitoring of the Affirmative Action Program for protected veterans with the support of all management including senior management.

Those responsibilities shall include, but not be limited to, the following:

1. The development of the AAP for protected veterans, policy statements, personnel policies and procedures, internal and external communication of the policy, and monitoring the effectiveness of these actions;

2. Reviewing all personnel actions, policies, and procedures to ensure compliance with Southwest Tennessee Community College's Affirmative Action obligations;

3. Reviewing the qualifications of all applicants and employees to ensure protected veterans are treated in a nondiscriminatory manner when hiring, promotion, transfer and termination actions occur;

4. Monitoring the effectiveness of the program on a continuing basis through the development and implementation of an internal audit- and reporting- system that measures the effectiveness of the program;

5. Keeping management informed of equal opportunity progress and problems within the college through, at a minimum, periodic reports;

6. Providing department managers with a copy of the AAP for Protected Veterans and reviewing the program with them on an annual basis to ensure knowledge of their responsibilities for implementation of the program;

7. Reviewing the college's AAP for protected veterans with all managers and supervisors at all levels to ensure that the policy is understood and is followed in all personnel activities;

8. Serving as a liaison between Southwest Tennessee Community College and enforcement agencies; and

9. Serving as a liaison between Southwest Tennessee Community College and organizations for protected veterans.
B. Responsibilities of Managers and Supervisors:

Managers and supervisors are advised annually of their responsibilities under the college's AAP for protected veterans and of their obligations to:

1. Review the college's Affirmative Action policy for protected veterans with subordinate managers and supervisors to ensure that they are aware of the policy and understand their obligation to comply with it in all personnel actions;

2. Review the qualifications of all applicants and employees to ensure qualified individuals are treated in a nondiscriminatory manner when hire, promotion, transfer, and termination actions occur; and

3. Review all employees' performance to ensure that non-discrimination is adhered to in all personnel activities.
X. Training (41 CFR 60-300.44(j))

All personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes shall be trained to ensure that the commitments in the college’s Affirmative Action Program are implemented.