

UT SOUTHWESTERN MEDICAL CENTER AT DALLAS

2011
AFFIRMATIVE ACTION PLAN

FOR MINORITIES AND WOMEN

Plan Year

January 1, 2011 – December 31, 2011

UT Southwestern Medical Center at Dallas

AFFIRMATIVE ACTION PLAN

2011

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SECTION I.

Part 1

Policy Statement

It is the policy of The University of Texas Southwestern medical Center at Dallas to ensure equal opportunity to all individuals in a positive program of non-discrimination.

All employment-related activities and decisions, including recruitment, hiring, assignment, promotion, training, benefits, use of facilities and other privileges, are made without regard to race, color, religion, sex, national origin, age, sexual orientation, handicap, or veteran status. It is the goal of UT Southwestern to have its campus accessible to the physically disabled and free from unnecessary physical barriers.

We pledge every good faith effort to achieve our established goals, and have assigned various levels of responsibility to both direct and oversee our affirmative action efforts.

Vernon R. Mullen, the Assistant Vice President of the Office of Equal Opportunity at UT Southwestern, has been designated Equal Employment Opportunity Officer of the University. The Office of Equal Opportunity is responsible for monitoring and implementing this institutions' affirmative action and equal opportunity policies and efforts, as well as providing equal opportunity training or recommending outside resources. Individual managers, supervisors and department heads are responsible for ensuring that their employment decisions comply with principles embodied in Title VII, the Age Discrimination in Employment Act, the Americans with Disability Act, and Revised Order No. 4.

Each employee is responsible for bringing to the attention of the Office of Equal Opportunity any Employment decision, which he or she feels, conflicts with the letter or spirit of the law.

UT Southwestern intends to comply fully with all applicable federal and state statutes, regulations, and executive orders.

MEMORANDUM

To: All Employees and Applicants for Employment

From: Daniel K. Podolsky, M.D., President

Date: January 1, 2011

RE: Equal Opportunity Policy

It is the policy of The University of Texas Southwestern Medical Center at Dallas to ensure equal opportunity to all individuals in all areas of employment (recruitment, hiring, training, assignment, and promotion), and use of facilities and privileges without regard to race, color, religion, sex, national origin, age, sexual orientation, handicap or veteran status.

UT Southwestern intends to fully comply with all appropriate laws and regulations.

UT Southwestern's commitment to equal opportunity requires a constant effort. In addition to this memo, special programs and seminars emphasizing equal opportunity at UT Southwestern are presented throughout the year and are available to the entire UT Southwestern Community.

Any question or concerns about the equal opportunity programs should be directed to Vernon Mullen, Assistant Vice President of the Office of Equal Opportunity and Minority Affairs at (214) 648-4343. He is located on the 11th floor, suite 1139 in the Paul M. Bass Administrative and Clinical Center.

Part 2.

**STATEMENT OF AFFIRMATIVE ACTION
AND EMPLOYMENT POLICY FOR
THE UNIVERSITY OF TEXAS SOUTHWESTERN MEDICAL CENTER
AT DALLAS**

I. Federal Legislation Supporting Equal Employment Opportunity

The University of Texas Southwestern Medical Center at Dallas supports Title VII Section 703 of the Civil Rights Act of 1964, which became effective July 2, 1965. Title VII was amended extensively on March 23, 1972 by the Equal Employment Opportunity Act of 1972. This 1972 Amendment has the following impact:

1. Extended the power of the Equal Employment Opportunity Commission to bring civil actions in federal court on behalf of complaints and,
2. Extended Title VII coverage to state and local governments and educational institutions.

Title VII prohibits discrimination based on race, color, religion, sex and national origin in all terms and conditions of employment, including hiring, firing, promotion, and fringe benefits. Title VII prohibits:

1. An employer from failing or refusing to hire, discharging or otherwise discrimination against, a person with respect to compensation, terms, condition, or privileges of employment on the basis of such individual's race color, religion, sex, or national origin.
2. An employer from limiting, segregating, or classifying employees in such a way as to deprive any individual of employment opportunities or otherwise adversely affect the employees' status on the basis of such individual's race, color, religion, sex, or national origin.

II. State Legislation Supporting Equal Employment Opportunity

The University's Equal Employment Opportunity statement is supported by State Legislation—Title 110-A, Article 6252-16, and prohibits discrimination against persons because of race, religion, color, sex or nation origin.

Section 1. (a) No officer or employee of the State or a political subdivision of the State, when acting or purporting to act in his official capacity may:

1. Refuse to employ a person because of the person's race, religion, color, sex or national origin.
2. Discharge a person from employment because of the person's race, religion, color, sex or national origin.
3. Refuse to issue a license, permit, or certificate to a person because of the person's race, religion, color, sex or national origin.
4. Revoke or suspend the license, permit, or certificate to a person because of the person's race, religion, sex or national origin.
5. Refuse to permit a person to use facilities open to the public and owned, operated, or managed by or on behalf of the state or political subdivision of the state, because of the person's race, religion, color, sex or national origin.
6. Refuse to permit a person to participate in a program owned, operated, or managed by or on behalf of the state, because of the person's race, religion, color, sex or national origin.
7. Refuse to grant a benefit to, or impose an unreasonable burden upon a person because of the person's race, color, religion, sex or national origin.
8. Refuse to let a bid to a person because of the person's race, religion, color, sex or national origin.

III. University Regulations and Policies Supporting Equal Employment Opportunity

The University's Equal Employment Opportunity Policy statement is supported by:

- A. Employee Guide, Section IV, Philosophy, Equal Opportunity, page 5. "UT Southwestern Medical Center at Dallas complies with equal opportunity for all regardless of race, religion, color, sex, national origin, age, handicap or veteran status."
- B. UT Southwestern's commitment to equal opportunity was communicated to current employees through a special campus-wide training program and to all new employees during new employee orientation.

Consistent with the aforementioned declarations, the University of Texas Southwestern Medical Center at Dallas is committed to the development and implementation of a campus-wide Affirmative Action Plan which prohibits discrimination in employment because of race, color, religion, sex, handicap, age, national origin, handicap or veteran status.

Saying we are committed is not enough. First, we must realize that the principle of Affirmative Action is based on what is known about the nature of discrimination—that it is systemic, pervasive, subtle as well as overt, and that attitudes play a major role in its continued existence. Therefore, it follows that discrimination cannot be eliminated by revising only on those practices that are obviously unfair or by declaring a policy of equal employment opportunity. Instead, The University of Texas Southwestern Medical Center at Dallas is committed to instituting positive, concrete programs and procedures, which will identify and then correct all employment practices, which serve to perpetuate patterns of discrimination.

PART 3.

PURPOSE AND APPLICATION OF THE AFFIRMATIVE ACTION PROGRAM FOR MINORITIES AND FEMALES

The University of Texas Southwestern Medical Center at Dallas Affirmative Action Program for minorities and females is intended to be a vehicle by which the University ensures that its Equal Employment Opportunity policy is translated into Equal Employment Opportunity as a fact.

The Program contains specific and results-oriented procedures to which The University of Texas Southwestern Medical Center at Dallas has committed itself to apply every good-faith effort. The following material outlines these procedures and establishes responsibilities for their success.

This document is prepared pursuant to contractual requirements of the United States government and in conformity with the regulations promulgated for affirmative action compliance by the Secretary of Labor.

The University categorically states that nothing in this Plan and no action it takes thereunder shall constitute an admission that the University is in any way in violation of the Executive Order 11246 or any rule or regulation issued by the OFCCP or any other governmental agency.

As required by government regulations, the Medical Center has used certain terminology herein such as “**utilization analysis**”, “**under utilization**” and “**problem area**”. These terms are expressly disavowed as an admission of any kind; they have no independent legal or factual significance whatsoever; the criteria used in relation to them being those specified by the government. The University has used any such terms in total good faith in connection with its affirmative action program, but such usage does not mean that the University agrees that these terms are properly applied to any particular factual situation.

The setting of any “goal” in this Plan shall not constitute an admission that such a goal is required in order to be in compliance with the Executive Order 11246; and it is expressly understood that the establishment of goals “**should not be used to discriminate against any applicant or employee because of race, color, religion, sex, or national origin**” as stated in 41 CFR 60-2.30. The utilization analysis contained in this Plan is based on statistical comparisons that involve the use of certain skill and qualification assumptions, geographic areas and sources of statistics, all of which are required by government regulations as interpreted by government representatives. The use of such geographical areas, skill and qualification assumptions, and sources of statistics does not indicate an agreement by the University that such geographic areas are appropriate, that this skill and qualification assumptions are correct, or that the sources of statistics are relevant and is intended to have no significance outside the context of the Affirmative Action Plan. However, such statistics,

skill and qualification assumptions and geographic areas are used herein in total good faith with respect to the Affirmative Action Plan.

This Affirmative Action Plan and supporting data contains confidential information related to staffing patterns, pay scales, goals and timetables, which are mandatorily exempted from disclosure under the provisions of 18 U.D.C. 1905. Chrysler Corp. vs. Brown, 441, U.S.281, (1979). When copies of this Affirmative Action Plan and any documents and supporting data are made available to any representative of the OFCCP or any other government agency, such shall be done on the condition that the government will hold this plan and all such information so loaned totally confidential and will not release copies to any persons whatsoever, without first securing permission from the University to do so, or if denied, without first notifying the University that it intends to do so anyway.

The University considers this Affirmative Action Plan to be exempt from disclosure, reproduction or distribution under the Public Information Act upon the grounds, among other, that such material constitutes (1) personnel files, the disclosure of which would constitute clearly unwarranted invasion of personal privacy, and which are exempt from disclosure under 5 U.S.C. 5222 (b); (2) confidential, commercial or financial information which is exempt from disclosure under 5 U.S.C. 552 (b) (4); (3) investigatory records compiled for law enforcement purposes, the production of which would constitute an unwarranted invasion of personal privacy and which are exempt from disclosures under 5 U.S.C. 552 (b) (7) (c); and (4) matters specifically exempted from disclosure by statute which are exempt from disclosure under 5 U.S.C. 552 (b) (3). Notice is hereby given of a request pursuant to 41 CFR 60-60.4 (d) that portions of this Plan be kept confidential.

Thus, the University wishes to make it clear that it does not consent to the release of any information whatsoever contained in this Affirmative Action Plan under the Public Information Act or otherwise. If the United States Government or any agency or subdivision thereof should consider breaching the conditions under which this Plan should be loaned to such government or should release of any of the information in this plan be sought by anyone, the Medical Center representative to be contacted immediately is Mr. Vernon Mullen, at (214) 648-4344.

The University further requests that anyone who has any contact with or access to this Affirmative Action Plan, or its supporting documents and other data, treat such information as confidential and that such information not be released to any unauthorized person whatsoever. The Medical Center also claims that retention or disclosure of information related to identifiable individuals may also violate the Privacy Act of 1974.

Although the University does not believe any violation of Title VII to have occurred, the Affirmative Action Plan was drawn up in accordance with and in reliance upon OFCCP's guidelines on Affirmative Action, 41 C.F.R. 60-2.

Handicapped and veterans are included in Part Two of this program; however, nothing contained herein in reference to these groups should be viewed as an admission. In addition,

demographic statistics and numerical representations are not required by United States government regulation.

The use of pronouns of the male gender and terms containing the word “man” is used purely for convenience. These are generic terms of long standing and are intended to include female as well as male employees. The University does not prefer one sex over the other in filling jobs and no such preference should be inferred or implied.

SECTION II.

DISSEMINATION OF POLICY

UT southwestern Medical Center at Dallas has established various channels of communication to ensure that employees and the community are aware of the University's positive posture relative to equal employment opportunity and affirmative action. As part of UT Southwestern's effort to inform its employees and university community the following steps have been taken in order to assure implementation of the Affirmative Action Program:

A. Dissemination of the EEO Policy internally

- a) The EEO policy has been implemented by the University President and has been posted within the institution where employees and applicants see it.
- b) University publications include an equal opportunity statement and highlight the University's policy and practice of Equal Opportunity.
- c) Required governmental EEO posters have been posted in the institution where employees and applicants see them.
- d) The University's Equal Opportunity policy is given to all new employees as part of their orientation, and is stated in all employee handbooks.
- e) At regularly held staff and faculty meetings, all administrators have been periodically informed of the equal opportunity and affirmative action commitments of the University and further, that each manager is held accountable for ensuring that these commitments are met in his/her area of responsibility.
- f) Supervisory training courses include sessions on Equal Opportunity and Affirmative Action.
- g) The existence of the facility's affirmative action program has been communicated to employees, and the Medical Center will make available such elements of its program as will enable our employees to know of and avail themselves of its benefits.
- h) A campus-wide training program initiated under the State Appropriations Act, Article IX, EEO Section 123.5 provides training to every employee on UT Southwestern Policies & Procedures prohibiting discrimination, including sexual harassment.
- i) Biennially, training is provided by the Texas Commission on Human Rights to managers, supervisors, and employees on EEO Policies and Guidelines.

B. External Dissemination of the EEO Policy

- a) All recruitment sources are advised in writing of the University's equal opportunity policy. Minority organization, female organizations, handicapped agencies and community agencies are also notified of our policy.
- b) The University has included the equal opportunity clause in each of its contracts, subcontracts, purchase order and leases covered by Executive Order 11246, as amended, and its implementing regulations. The equal opportunity clause will also be included in modifications, renewals or extensions if not included in the original.
- c) All subcontractors, vendors, and suppliers of the University are notified in writing of the University's equal opportunity policy. Vendors and suppliers are notified of relevant obligation under Executive Order 11246. Vendors must certify compliance with Executive Order 11246 regulations if their business exceeds \$10,000.
- d) Recruitment advertising contains clear statements of the Equal Opportunity Policy.
- e) Employment applications and other materials for prospective employees include notice of the University's Equal Opportunity Policy.
- g) The University has a business plan for Historically Underutilized Businesses (HUB Plan) which reflects the University's equal opportunity commitment to increased utilization of goods and services provided by female and minority vendors.

SECTION III.

RESPONSIBILITY FOR IMPLEMENTATION

Dr. Daniel K. Podolsky, President, has the ultimate responsibility for ensuring that equal employment opportunity and affirmative action receive the high level of priority, which is due this activity. He has empowered Ruben Esquivel, Vice President for Community and Corporate Relations, as the University official with full authority to implement the Affirmative Action Plan.

Vernon R. Mullen, Assistant Vice President of the Office of Equal Opportunity and Minority Affairs, has been designated the Equal Opportunity Officer at UT Southwestern Medical Center at Dallas and has the full support of the President and Vice President for Human Services Administration in carrying out his duties. It shall be his responsibility to:

1. Assist in identification of problem areas.
2. Assist management in arriving at solutions to problems.
3. Monitor the effectiveness of the Affirmative Action Program.
4. Act as Liaison between The University of Texas Southwestern Medical Center and employment services and community organizations for recruitment of minority groups and females.
5. Keep university officials informed of latest developments in the equal opportunity area and assist in meeting the University's equal opportunity objectives.
6. Act as counsel and advisor for any employee who feels that he/she has been denied equal opportunity.
7. Conduct audits at least quarterly of the faculty to ensure that all posters and notices are properly displayed and that the locations within the facility, maintained for the use and benefit of employees, are in fact desegregated, both in policy and actual use.
8. Ensure that there is an ongoing recruitment program to identify underutilization groups at all levels.
9. Review department's employment practices and determine whether barriers exist for underutilized groups.

The responsibility for attaining the goals and objectives specified in this plan rests with all managers and administrators in the University. To ensure compliance with the Affirmative Action Program the managers and administrators shall:

1. Disseminate the University's policy to all employees under their supervision.
2. Ensure that all employees under their supervision know the principle of equal opportunity.

The University of Texas Southwestern Medical Center at Dallas has reviewed its recruitment and advertising policies, employment policies, practices and procedures, and wage structure to ensure compliance with affirmative action goals and applicable equal employment opportunity laws and regulations as listed below:

- o Civil Rights Act of 1964 (Title VII as amended)
- o Age Discrimination in Employment Act of 1967 as amended
- o Order #11246 (196) Amended Order 11375
- o Vocational Rehabilitation Act of 1973
- o Vietnam Era Veterans Readjustment Act of 1974
- o Equal Pay Act of 1963

Overall responsibility for ensuring compliance and continued implementation of the policy is assigned to Vernon R. Mullen, Assistant Vice President of the Office of Equal Opportunity and Minority Affairs, as the Equal Opportunity Officer. The Equal Opportunity Officer for this facility, Vernon R. Mullen, shall coordinate this policy, monitor the University's performance and report on the results.

There is also responsibility within each department and the Office of Human Resources. Each department head is responsible for carrying out equal opportunity and affirmative action at the department level. Human Resources is responsible for monitoring and maintaining equal opportunity in all employment decisions.

SECTION IV.

IDENTIFICATION OF PROBLEM AREAS

An in-depth analysis is made of job groups declared underutilized. This analysis focuses on composition of the workforce by minority group and by sex and the effectiveness of applicant flow. The total selection process is reviewed including position descriptions, positions titles, job specifications, application forms, interview procedures, test validation and administration, referral procedures, final selection process and similar factors. Transfer and promotion policies and training programs are also reviewed. Where any of these found to have adverse impact on women or minorities corrective action is taken.

Applicant Flow

An analysis of our applicant data has been conducted and adverse impact analysis has been completed to determine if minorities and females are adversely impacted by the applicant pool and their rate of hires. A review of applicant flow data and new hires is summarized by Job Group under the “*New Hire Summary*” included in the back of this Plan.

Corrective Action

The results of this analysis will be provided to the Office of Human Resources so that we can address areas of underutilization or other problem areas.

Utilization

An analysis of Female and Minority representation reveals that females and minorities are underutilized in the Job Groups Identified in the chart attached to this section.

Corrective Action

The Office of Human Resources will be notified of these areas of underutilization. When job openings occur in these job groups, every effort will be made to fill these positions with Female or Minority candidates.

Promotions

Promotions have been analyzed by Job Category and Job Group and areas where minorities and females have been adversely impacted have been adversely impacted have been identified. This analysis is included under the Promoted Employee Section at the rear of this Plan.

Corrective Action

Females and Minorities are encouraged to utilize the Job Bid System to move to positions of higher responsibility. All open jobs are posted in the Job Bid System. We continue to examine creative programs to hire and promote females and minorities into executive and administrative positions.

Terminations

Terminations have been analyzed by Job Category and Job Group and areas where minorities and females have been adversely impacted have been identified. This analysis is included under the Termination Summary Section at the rear of the Plan.

Corrective Action

Details of these results will be provided to the Office of Human Resources to sensitize the organization to any problem areas. Voluntary and non-voluntary terminations will be analyzed to determine corrective action where minorities and females are adversely impacted.

SECTION VI.

INTERNAL AUDIT AND REPORTING SYSTEM

To assure that the University's Affirmative Action Program is fully implemented and is progressing towards accomplishing its goal, the following internal audit system has been established:

1. All employment activities are monitored, including but not limited to, the following:

- Applicant Flow
- Selection / Hiring Rate
- Transfers / Promotions
- Salary Actions
- Disciplinary Actions
- Terminations

2. Detailed data on the above-listed areas is compiled by human resources managers on a weekly basis and is available to the Assistant Vice President of the Office of Equal Opportunity for review.
3. Formal reports on the progress made towards goals are submitted by the Assistant Vice President of the Office of Equal Opportunity on a quarterly basis.
4. Meetings are held by the Assistant Vice President of the Office of Equal Opportunity to update the Vice President for Community and Corporate Relations on affirmative action issues and to identify and resolve problem areas.
5. A summary of key activities and accomplishments in implementing the affirmative action plan is submitted to university officials on a regular basis.

SECTION VII.

SUPPORT OF COMMUNITY ACTION PROGRAMS

Recognizing our role as an employer in this community, UT Southwestern Medical Center actively seeks to support community action programs designed to improve job skills and/or employment opportunities for minorities and women.

During the past year, the University participated in numerous locally sponsored career days designed to provide women and minorities with information regarding career opportunities. We will continue to participate in these local events. Where possible, employment representatives participate in minority job fairs.

Other recruiting strategies include recruitment at college campuses and ethnic minority churches, advertising in minority newspapers, listing jobs with Chambers of Commerce and contacting community agencies.

In addition to programs for current minority employees and recruitment efforts for open positions, UT Southwestern has special programs for high school students to introduce them to careers at the Medical Center.

Section VIII.

COMPLIANCE WITH SEX DISCRIMINATION

GUIDELINES

UT Southwestern Medical Center seeks to comply with all state and federal laws regarding nondiscrimination. We reaffirm our commitment to give attention to the special concerns associated with equal treatment on the basis of sex.

Recruitment

Applicants of both sexes will be sought for all vacancies unless sex is a bona fide occupational qualification.

Personnel Policies and Practices

The University's policy ensures that women are treated equally with men in all aspects of employment. All written personnel policies and job practices related to opportunities, pay rates, hours or other working conditions will state that no employee will be discriminated against based on sex.

Similarly, no distinction will be made between married and unmarried persons of one sex that is not also made for the opposite sex; or differences in mandatory or optional retirement age based on sex.

Seniority

No seniority list or system will be maintained based solely on sex.

Compensation and Promotion

All employees will be paid and promoted on the basis of the job-related skill, effort and responsibility required as well as the working conditions, competitive market forces and performance factors. Sex will not be considered in pay and promotion decisions.

Pregnancy and Related Medical Conditions

UT Southwestern Medical Center will not discriminate against employees on the basis of pregnancy or related medical condition.

Sexual Harassment

UT Southwestern Medical Center prohibits discrimination on the basis of sex, including sexual harassment. The University will make every effort to see that this policy is communicated to supervisors and employees and that it is properly enforced.

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MEMORANDUM

To: All Employees and Applicants for Employment

From: Daniel K. Podolsky, M.D., President

Date: January 1, 2011

Re: Equal Opportunity Policy

It is the policy of The University of Texas Southwestern Medical Center at Dallas to ensure equal opportunity to all individuals in all areas of employment (recruitment, hiring, training, assignment, and promotion), and use of facilities and privileges without regard to race, color, religion, sex, national origin, age, sexual orientation, handicap or veteran status.

UT Southwestern intends to fully comply with all appropriate laws and regulations.

UT Southwestern's commitment to equal opportunity requires a constant effort. In addition to the memo, special programs and seminars emphasizing equal opportunity at UT Southwestern are presented throughout the year and are available to the entire UT Southwestern Community.

Any question or concerns about the equal opportunity programs should be directed to Vernon Mullen, Assistant Vice President of the Office of Equal Opportunity and Minority Affairs at (214) 648-4343. He is located on the 11th floor, suite 1139 in the Paul M. Bass Administrative and Clinical Center.

SECTION IX.

CONSIDERATION OF MINORITIES

AND FEMALES NOT IN THE WORKFORCE

In an effort to consider qualified women and minorities not currently in the workforce who can be recruited through affirmative action efforts, UT Southwestern Medical Center has instituted community friendly programs such as job bidding that is open to all parties including individuals not currently employed by UT Southwestern, job referrals, Internet Accessing of open positions and a job listing system that is accessible by telephone.

SECTION X.

AFFIRMATIVE ACTION PLAN

FOR THE DISABLED

A. General

UT Southwestern Medical Center supports community programs designed to provide employment opportunities for the disabled. Recognizing that individuals with a disability are a valuable human resource, the University has formalized its support of these programs by implementing an affirmative action plan for the employment and advancement of qualified physically and mentally disabled individuals.

B. Definition of Disabled Applicants and Employees

The law defines “Handicapped Individuals” as any person who (1) has a physical or mental Impairment that substantially limits one or more of such person’s major life activities, (2) has a record of such impairment, or (3) is regarded as having such an impairment. For purposes of this plan, a disabled individual is “substantially limited” if he or she is likely to experience difficulty in securing, retaining or advancing in employment because of a disability. The terms “handicapped” and “disabled” are intended to have the same meaning within this Plan.

C. Consideration of Qualifications

1. All applicants for employment with the University are invited to voluntarily identify themselves as disabled and indicate any reasonable accommodation that can be made to enable them to perform a job that they would not otherwise be able to do.
2. If a disabled applicant or employee is not selected for employment, promotion or training, the reason for the non-selection is documented.
3. Whenever an accommodation is made for the hire, promotion or training of a disabled individual, a description of the accommodation is documented.

D. Physical and Mental Requirements

1. Selection processes involved in hiring, promotions and training opportunities are reviewed annually to ensure that no qualified disabled individual is screened out.
2. Job requirements are reviewed and updated periodically to ensure that they are realistic and do not contain unnecessary qualifications, which serve to screen out disabled individuals.

E. Accommodations to Physical and Mental Limitations of Employees

UT Southwestern Medical Center will try to reasonable accommodate the physical and mental limitations of qualified, disabled applicants or employees so as to ensure that each one is afforded equal opportunity for employment and advancement. In determining the degree of accommodations that may be reasonably undertaken, business necessity and expenses will be considered with such other related factors as: efficiency, health and safety, the essential functions of each specific job, etc. Each decision regarding accommodations will be determined on an individual basis.

UT Southwestern Medical Center will consider the following types of accommodations:

1. Architectural Modifications:
 - a. Curb Accessibility
 - b. Entrance door accessibility
 - c. Ramps
 - d. Distance from parking lot to building entrance
 - e. Restroom facilities which accommodate wheelchairs

2. Work Environment Modifications:
 - a. Lowered or raised work surfaces
 - b. Special lighting
 - c. Rearranged shelves

3. Work Schedule Modifications:
 - a. Flex Time
 - b. Off Shifting
 - c. Part-time schedules

4. Job Task Modifications:
 - a. Sequencing changes
 - b. Functional rearrangements

5. Equipment Modifications:
 - a. Telephones equipped with amplifiers
 - b. Altered controls to accommodate left or right hand or foot operation

F. Compensation

When offering employment or promotions to a qualified disabled person, UT Southwestern Medical Center will not consider disability income, pension income, or other benefits received by the applicant or employee as relevant to determination of his/her salary. No deductions from the University pay will be made for any other income of that nature.

G. Outreach and Positive Recruitment

1. UT Southwestern Medical Center works with local recruiting sources and special service agencies to ensure that disabled individuals are aware of openings and are submitting applications. These agencies include:
 - a. The Texas Workforce Commission
 - b. Social Services Department
 - c. Skills and Career Development Centers
 - d. State Department of Rehabilitation
 - e. And other rehabilitation centers
2. All UT Southwestern Medical Center recruiters, interviewers, managers and supervisors interviewing the disabled.
3. Our employment records are reviewed periodically to determine the availability of promotable and transferable disabled employees. Additionally, the same review is made to determine whether disabled employees' present and potential skills are being utilized and/or developed.

H. Dissemination

UT Southwestern Medical Center recognizes the importance of communication its EEO policies and procedures to employees and prospective employees. To ensure the dissemination of these policies, UT Southwestern has taken the following action.

Internal Dissemination

1. Written communication from the University President reemphasizing our commitment to Equal Employment Opportunity and Affirmative Action is posted throughout the university.
2. The University's Policy Statement is posted on bulletin boards near employee work sites.
3. A copy of the University's Affirmative Action Policy Statement is included in the Human Resources Manual.
4. Bulletin boards bear the appropriate federal and state EEO posters.
5. Meetings are held with management and supervisory personnel to discuss EEO programs.
6. The progress of the Affirmative Action Program is reported at least annually.
7. Emphasis is placed on affirmative action during training and orientation sessions.

8. University publications periodically discuss issues pertaining to EEO and Affirmative Action.

External Dissemination

1. Recruitment sources are informed of the UT Southwestern Medical Center's Equal Employment Opportunity policy and are requested to recruit and refer in a manner that represent the University's policy.
2. UT Southwestern Medical Center works with local community agencies to assure that the disabled are aware of openings and are submitting applications. These agencies include:
 - a. The Texas Workforce Commission
 - b. The local Committee for Employment of the Disabled
 - c. The Social Services Department
 - d. Various private and community colleges/universities
3. Job posting bulletins listing all current openings, job duties, qualifications and general information are distributed to community organizations serving the disabled.
4. An Equal Employment Opportunity clause is included in all purchase orders.

**I. Responsibility for Implementation
EEO Administrator**

Vernon R. Mullen, Assistant Vice President of the Office of Equal Opportunity, has been appointed EEO Administrator. In this capacity, he is responsible for the following:

1. Developing policy statements, affirmative action programs and both internal and external communication programs.
2. Ensuring the consistency and completeness of the UT Southwestern Medical Center's Affirmative Action Plan with federal, state and local agencies' rules and regulations.
3. Assisting line management in collecting and analyzing employment data, identifying problems areas, and developing programs.
4. Providing feedback to line managers on their affirmative action progress.
5. Designing, implementing and monitoring internal audit and reporting systems to measure program effectiveness and to determine where progress has been made and where further action is needed.
6. Serving as a liaison between the UT Southwestern Medical Center, government regulatory agencies, and organizations and other community groups serving the disabled.
7. Ensuring that current legal information affecting affirmative action is disseminated to appropriate personnel.

Managers and Supervisors

Managers and supervisors have the ultimate responsibility for decisions affecting progress toward achieving affirmative action goals. Their responsibilities include:

1. Assisting in identifying problem areas.
2. Being actively involved with local disabled service programs designed to promote equal employment opportunity.
3. Reviewing qualifications of all employees to ensure disabled are given full opportunity for transfers and promotions.
4. Reasonable accommodating employees with disabilities.
5. Conducting and supporting career counseling for all staff members.

6. Ensuring that posters and notices are properly displayed.
7. Ensuring that employees with disabilities are afforded full employment opportunities and are encouraged to participate in all university-sponsored educational, training and social activities.
8. Ensuring that their department fully complies with the spirit and policies of the Affirmative Action Program.
9. Accountability to senior management for personal support of the UT Southwestern Medical Center's EEO policies and personal contributions toward achieving affirmative action.

J. Development and Execution of Affirmative Action Programs

1. At least annually, all aspects of selection, training and promotion are reviewed to ensure freedom from stereotyping persons with a disability, which limits their access to jobs for which they are qualified.
2. Schools from which we recruit are informed of our commitment to employ individuals with a disability.
3. Disabled employees are encouraged to participate in community-sponsored programs designed to provide career-related information.

SECTION XI.
AFFIRMATIVE ACTION PLAN
FOR
DISABLED VETERANS
AND
VETERANS OF THE VIETNAM ERA

A. General

UT Southwestern Medical Center supports community programs designed to provide employment opportunities for disabled veterans and veterans of the Vietnam Era. Recognizing that veterans are a valuable human resource, the University has formalized its support of these programs by implementing an affirmative action plan for the advancement of qualified veterans and veterans of the Vietnam Era.

B. Definition of Disabled Veterans and Veterans of the Vietnam Era

The law defines “disabled veterans” as a person entitled to disability compensation under the laws administered by the Veterans’ Administration for disability rated at thirty (30%) or more, or a person whose discharge or release from active duty was for a disability incurred or aggravated in the line of duty.

A Vietnam era veteran is a person who;

- Served on active duty for a period of more than 180 days, any part of which occurred between August 5, 1964 and May 7, 1975, and was discharged or released with other than a dishonorable discharge;
- Was discharged or released from active duty for a service connected disability if any part of such active duty was performed between August 5, 1964 and May 7, 1965; or
- Served on active duty for more than 180 days and served in the Republic of Vietnam between February 28, 1961 and May 7, 1975.

C. Consideration of Qualifications

1. Each applicant applying for employment with the UT Southwestern Medical Center is invited to voluntarily identify as a disabled veteran or veteran of the Vietnam Era and to indicate any reasonable accommodation that can be made to enable him to perform a job that he would not otherwise be able to do.

2. If a disabled veteran or veteran of the Vietnam Era is not selected for employment, promotion or training, the reason for the non-selection is documented.
3. Whenever an accommodation is made for the hiring, promotion or training of a disabled veteran, a description of the accommodation is documented and maintained by the Office of Equal Opportunity.

D. Physical and Mental Requirements

1. Selection processes involved in hiring, promotions and training opportunities are reviewed annually to ensure that no qualified disabled veteran is screened out.
2. Job requirements are reviewed and updated annually to ensure that they are realistic and do not contain unnecessary qualifications which would serve to screen out qualified disabled veterans.

E. Compensation

When offering employment or promotion to a disabled veteran or veteran of the Vietnam Era, UT Southwestern Medical Center will not consider disability income, pension income, or other benefits received by the applicant or employee as relevant to determine his salary. No deduction from the university pay will be made for any other income of that nature.

F. Outreach and Positive Recruitment

1. UT Southwestern Medical Center works with local recruiting sources and social service agencies to ensure that disabled veterans and veterans of the Vietnam Era are aware of openings and are submitting applications. These agencies include:
 - a. The Texas Workforce Commission
 - b. Skills and Career Development Centers
 - c. Social Services Department
 - d. Veterans' Assistance Center
 - e. Veterans' Administration
2. All UT Southwestern Medical Center recruiters, interviewers, managers and supervisors responsible for employment decisions have been given special training for interviewing disabled veterans.
3. Our employment records are reviewed annually to determine the availability of promotable and transferable disabled veterans and veterans of the Vietnam Era. Additionally, the same review is made to determine whether veteran employees' present and potential skills are being fully utilized and/or developed.

G. Dissemination

UT Southwestern Medical Center recognized the importance of communication its EEO policies and procedures to employees and prospective employees. To ensure the dissemination of these policies, UT Southwestern Medical Center has taken the following action:

Internal Dissemination

1. Written communication from the University's Chief Executive Officer reemphasizing our commitment to Equal Employment Opportunity and Affirmative Action is posted throughout the University.
2. UT Southwestern Medical Center's Policy Statement is posted on bulletin boards near employee work sites.
3. A copy of UT Southwestern Medical Center's Affirmative Action Policy Statement is included in the Human Resources Manual, and provided to all job applicants.
4. Bulletin boards bear the appropriate federal and state EEO posters.
5. Meetings are held with management and supervisory personnel to discuss EEO programs.
6. The progress of the Affirmative Action Program is reported at least annually.
7. Emphasis is placed on affirmative action during training and orientation sessions.
8. UT Southwestern Medical Center publications periodically discuss issues pertaining to EEO and Affirmative Action.

External Dissemination

1. Recruitment sources are informed of the UT Southwestern Medical Center's Equal Employment Opportunity policy and are requested to recruit and refer in a manner that represents the University's policy.
2. UT Southwestern Medical Center works with local community agencies to assure disabled veterans and veterans of the Vietnam Era are aware of openings and are submitting applications. These agencies include:
 - a. The Texas Workforce Commission
 - b. Various private and community colleges/universities

3. Job posting bulletins listing all current openings, job duties, qualifications and general information are distributed to community organizations serving veteran applicants.
4. An Equal Employment Opportunity clause is included in all purchase orders.

H. Responsibility for Implementation EEO Administrator

Vernon R. Mullen, Assistant Vice President, has been appointed EEO Administrator. In this capacity, he is responsible for the following:

1. Developing policy statements, affirmative action programs and both internal and external communication programs.
2. Ensuring the consistency and completeness of the UT Southwestern Medical Center's Affirmative Action Plan with federal, state and local agencies' rules and regulations.
3. Assisting line management in collecting and analyzing employment data, identifying problem areas, and developing programs.
4. Providing feedback to line managers on their affirmative action progress.
5. Designing, implementing and monitoring internal audit and reporting systems to measure program effectiveness and to determine where progress has been made and where further action is needed.
6. Serving as a liaison between the UT Southwestern Medical Center, government regulatory agencies, minority and women's organizations and other community groups serving disabled veterans and veterans of the Vietnam Era.
7. Ensuring that current legal information affecting affirmative action is disseminated to appropriate personnel.

Managers and Supervisors

Managers and supervisors have the ultimate responsibility for decisions affecting progress toward achieving affirmative action goals. Their responsibilities include:

1. Assisting in identifying problem areas.
2. Being actively involved with local veteran service programs designed to promote equal employment opportunity.

3. Reviewing qualifications of all employees to ensure disabled veterans and veterans of the Vietnam Era are given full opportunity for transfers and promotions.
4. Reasonably accommodating disabled veteran employees.
5. Conducting and supporting career counseling for all staff members.
6. Ensuring that posters and notices are properly displayed.
7. Ensuring that veteran employees are afforded full employment opportunities and are encouraged to participate in all university-sponsored educational, training and social activities.
8. Ensuring that their department fully complies with the spirit and policies of the Affirmative Action Program.
9. Accountability to senior management for personal support of the University's policies and for personal contributions toward achieving affirmative action.

I. Development and Execution of Affirmative Action Program

1. At least annually, all aspects of selection, training and promotion are reviewed to ensure freedom from stereotyping disabled veterans and veterans of the Vietnam Era in a manner which limits their access to jobs for which they are qualified.
2. Schools from which we recruit are informed of our commitment to employ disabled veterans and veterans of the Vietnam Era.
3. Disabled veterans and veterans of the Vietnam Era are encouraged to participate in community-sponsored programs designed to provide career-related information.
4. UT Southwestern Medical Center meets its annual obligation to file a VETS-100 reporting form showing the number of veterans in our workforce.
5. UT Southwestern Medical Center lists all jobs with the Texas Workforce Commission.