Equitable Outreach, Recruitment, and Retention (EORR) Plan

for

Washington State University
100 Dairy Rd.
Pullman, WA 99164
509-335-8288

All WSU Locations

January 1, 2024-December 31, 2024

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PART I: EORR PLAN FOR MINORITIES AND WOMEN

PART II: EORR PLAN FOR PROTECTED VETERANS AND INDIVIDUALS WITH DISABILITIES

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This EORR Plan contains confidential information which is subject to the provisions of 18 U.S.C. 1905. Chrysler Corp. v. Brown, 441 U.S. 281, 19 FEP 475 (1979).

Copies of this EORR Plan and all related appendices, documents, and support data are made available on loan to the U.S. Government upon the request of said Government on the condition that the Government hold them totally confidential and not release copies to any persons whatsoever. This EORR Plan and all its supporting documents contain much confidential information which may reveal, directly or indirectly, WSU's plans for business or geographical expansion or contraction. WSU considers this EORR Plan to be exempt from disclosure, reproduction, and distribution under the Freedom of Information Act upon the grounds, among others, that such material constitutes (1) personnel files, the disclosure of which would constitute a clearly unwarranted invasion of personal privacy, which are exempt from disclosure under 5 U.S.C. 552(b)(6); (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, which are exempt from disclosure 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 Title 41 Code of Federal Regulations, Part 60-40.3 that portions of this EORR Plan be kept confidential.

WSU wishes to make it clear that it does not consent to the release of any information whatsoever contained in this EORR Plan under the Freedom of Information Act or otherwise. If the U.S. Government, or any agency or subdivision thereof, is considering breaching the conditions under which this EORR Plan was loaned to such Government, or is considering a request for release of this EORR Plan under the Freedom of Information Act, a request is hereby made that the Government immediately notify the President of WSU of any and all Freedom of Information Act requests received by the Government or any other contemplated release of this EORR Plan by the Government which relates to information obtained by the Government from WSU. We further request that everyone who has any contact with this EORR Plan, or its supporting data, treat such information as totally confidential and that such information not be released to any person whatsoever. Retention or disclosure of information relating to identifiable individuals may also violate the Privacy Act of 1974.

WSU EORR PLAN FOR
ALL WSU LOCATIONS

TABLE OF CONTENTS

Background	4
Applicable Affirmative Action Laws and Regulations	5
Covered Groups Under Affirmative Action Laws and Regulations	6
Program Terminology	7
Reliance on EEOC's Guidelines	7
Reporting Period	7
Statement of Purpose for Parts I and II	8
PART I: EORR PLAN FOR MINORITIES AND WOMEN	**9**
Part I Table of Contents	10
Chapter 1: Organizational Profile	11
Chapter 2: Job Group Analysis	12
Chapter 3: Placement of Incumbents in Job Groups	13
Chapter 4: Determining Availability	14
Chapter 5: Comparing Incumbency to Availability	16
Chapter 6: Placement Goals	17
Chapter 7: Designation of Responsibility	18
Chapter 8: Identification of Problem Areas	21
Chapter 9: Action-Oriented Programs	22
Chapter 10: Internal Audit and Reporting	40
PART II: EORR PLAN FOR PROTECTED VETERANS AND INDIVIDUALS WITH DISABILITIES	**41**
Part II Table of Contents	42
Chapter A: Policy Statement	43
Chapter B: Review of Personnel Processes	45
Chapter C: Physical and Mental Qualifications	46
Chapter D: Reasonable Accommodation to Physical and Mental Limitations	47
Chapter E: Harassment	48
Chapter F: External Dissemination of Policy, Outreach and Positive Recruitment	49
Chapter G: Internal Dissemination of Policy	50
Chapter H: Audit and Reporting System	51
Chapter I: Responsibility for Implementation	52
Chapter J: Training	56
Chapter K: Data Collection Analysis	57
Chapter L: Compensation	58

INTRODUCTION TO PARTS I AND II

BACKGROUND

Washington State University (WSU) is a public land grant university with Fall 2022 student enrollment of 27, 539. WSU operates campuses across Washington State, including WSU Pullman, WSU Everett, WSU Spokane, WSU Yakima, WSU Tri-Cities, WSU Vancouver, WSU Bremerton, and WSU Global Campus (offering online courses and degree programs). Additionally, WSU operates Extension and/or research programs in every county in Washington. WSU was founded in 1890 with the mission of advancing knowledge through creative research and scholarship across a wide range of academic disciplines; extending knowledge through innovative educational programs in which emerging scholars are mentored to realize their highest potential and assume roles of leadership, responsibility, and service to society; and applying knowledge through local and global engagement that will improve quality of life and enhance the economy of the state, nation, and world.

WSU is a federal government supply and service contractor subject to the affirmative action requirements of Executive Order 11246, the Rehabilitation Act of 1973 as amended, and the Vietnam Era Veterans' Readjustment Assistance Act of 1974, Section 4212. Because WSU has $50,000 or more in annual contracts with the federal government and employs 50 or more employees, we are required to prepare annual written affirmative action plans for minorities and women, for protected veterans, and for individuals with disabilities, for our organization. At WSU, this is called an Equitable Outreach, Recruitment, and Retention Plan (EORR Plan). Failure to comply with these laws and their implementing regulations, which are enforced by the Office of Federal Contract Compliance Programs (OFCCP), can result in debarment of WSU from future contracts and subcontracts.

Affirmative action is a term that encompasses any measure adopted by an employer to correct or to compensate for past or present discrimination or to prevent discrimination from recurring in the future. Affirmative action goes beyond the simple termination of a discriminatory practice. As stipulated in federal regulations, a prerequisite to the development of a satisfactory affirmative action plan is the evaluation of opportunities for protected group members, as well as an identification and analysis of problem areas inherent in their employment. Also, where a statistical analysis reveals a numeric disparity between incumbency and availability (and/or hiring rates for veterans), an adequate affirmative action plan details specific affirmative steps to guarantee equal employment opportunity. These steps are keyed to the problems and needs of protected group members. For minorities and women, such steps include the development of hiring and promotion goals to rectify the disparity between incumbency and availability. For protected veterans and individuals with disabilities, such steps will include a thorough review of the company's outreach efforts to determine the effectiveness of such efforts in closing the hiring and/or utilization gaps. It is toward this end that the following EORR Plan of WSU was developed.

APPLICABLE AFFIRMATIVE ACTION LAWS AND REGULATIONS

WSU's EORR Plan for minorities and women (Part I) has been prepared according to Executive Order No. 11246, as amended, and Title 41, Code of Federal Regulations, Part 60-1 (Equal Employment Opportunity Duties of Government Contractors), Part 60-2 (Affirmative Action Programs of Government Non-Construction Contractors; also known as "Revised Order No. 4"), and Part 60-20 (Sex Discrimination Guidelines for Government Contractors).

WSU has separately developed an EORR plan for protected veterans and individuals with disabilities (Part II) prepared in accordance with the Rehabilitation Act of 1973, Section 503, as amended and Title 41, Code of Federal Regulations, Part 60-741 (Affirmative Action Program for Individuals with Disabilities), the Vietnam Era Veterans' Readjustment Assistance Act of 1974, Section 4212 as amended, and Title 41 Code of Federal Regulations, Part 60-300 (Affirmative Action Program for protected veterans).

Under Section 503, a business with a federal contract of more than $15,000 is required to treat qualified individuals with disabilities without discrimination on the basis of their physical or mental disability in all employment practices, and to take affirmative action to employ and advance in employment individuals with disabilities. If the company has at least 50 employees and a single contract of $50,000 or more, then it must also develop a section 503 affirmative action plan, as described in 41 CFR 60- 741, Subpart C. Section 503 applies to business with federal construction contracts, but not to business with federally assisted construction contracts.

Under VEVRAA, a business with a federal contract of $140,000 or more is required to treat qualified individuals without discrimination based on their status as a protected veteran in all employment practices, and to take affirmative action to employ and advance in employment protected veterans. If the company has at least 50 employees and a single contract of $150,000 or more, then it must also develop a VEVRAA affirmative action plan, as described in 41 CFR 60-300, Subpart C. VEVRAA applies to business with federal construction contracts, but not to businesses with federally assisted construction contracts.

COVERED GROUPS UNDER AFFIRMATIVE ACTION LAWS AND REGULATIONS

Coverage under affirmative action laws and regulations applies to:

Women, and minorities who are recognized as belonging to or identifying with the following race or ethnic groups: Blacks/African Americans, Hispanics/Latinos, Asians, Hawaiians or Other Pacific Islanders, American Indians/Alaskan Natives, and Two or More Races.

Any veteran who is entitled to compensation (or who but for the receipt of military retired pay would be entitled to compensation) under laws administered by the Secretary of Veterans Affairs, or who was discharged or released from active duty because of a service- connected disability.

Recently separated veterans: any veteran currently within three-years of discharge or release from active duty.

Veterans who served on active duty in the U.S. military during a war or campaign or expedition for which a campaign badge is awarded.

Veterans who, while serving on active duty in the Armed Forces, participated in a United States military operation for which an Armed Forces service medal was awarded pursuant to Executive Order 12985.

An individual with a disability: 1) a person who has a physical or mental impairment that substantially limits one or more of his/her major life activities; (2) has a record of such impairment, or (3) is regarded as having such an impairment.

This plan is in accordance with the above coverage; however, WSU recognizes that the categorizations required by federal regulation do not encompass the rich and diverse identities of our community. The federal regulations do not capture nuances about race, ethnicity, gender identity, or other characteristics or traits that may provide unique experiences within our community. As examples, the federal regulations do not provide for capturing information related to people who identify as nonbinary, and the regulations use the term “minority,” while WSU recognizes that “people of color” is a more inclusive term to describe people from many historically oppressed racial and ethnic groups. Thus, it is important to denote that although this coverage does not capture the WSU community’s broad spectrum of experiences, and WSU recognizes and supports individuals who do not identify with the constructs listed above. WSU also recognizes and supports individuals who may experience discrimination based on protected class categories described in Executive Policy 15, the WSU Policy Prohibiting Discrimination and Harassment, through investigation and, where possible, voluntary and equitable resolution.

PROGRAM TERMINOLOGY

The terms, "comparison of incumbency to availability," "deficiency," and "problem area," appearing in this EORR Plan are terms WSU is required by government regulations to use. The criteria used in relation to these terms are those specified by the government. These terms have no independent legal or factual significance whatsoever. Although WSU will use the terms in good faith in connection with its EORR Plan, such use does not necessarily signify that WSU agrees that these terms are properly applied to any particular factual situation and is not an admission of non-compliance with EEO laws, regulations, and objectives.

The comparison of incumbency to availability contained herein is required by government regulations to be based on certain statistical comparisons. Geographic areas and sources of statistics used herein for these comparisons were used in compliance with government regulations, as interpreted by government representatives. The use of certain geographic areas and sources of statistics does not indicate WSU's agreement that the geographic areas are appropriate in all instances of use or that the sources of statistics are the most relevant. The use of such geographic areas and statistics may have no significance outside the context of this EORR Plan. Such statistics and geographic areas will be used, however, in good faith with respect to this EORR Plan.

The grouping of job titles into a given job group does not suggest that WSU believes the jobs so grouped are of comparable worth.

Whenever the term "goal" is used, it is expressly intended that it "should not be used to discriminate against any applicant or employee because of race, color, religion, gender, or national origin," as stated in Title 41 Code of Federal Regulations, Part 60-2.16(e)(2).

This EORR Plan is not intended to create any contractual or other rights in any person or entity.

RELIANCE ON EEOC'S GUIDELINES

Although WSU does not believe any violation of Title VII of the Civil Rights Act exists, it has developed this EORR Plan in accordance with and in reliance upon the EEOC's Guidelines on Affirmative Action, Title 29 Code of Federal Regulations, Part 1608.

REPORTING PERIOD

This EORR Plan is designed to cover the following reporting period,

- EORR Plan implementation period: January 1, 2024, through December 31, 2024
- Transaction period: October 1, 2022, through January 31, 2023

STATEMENT OF PURPOSE FOR PARTS I AND II

This EORR Plan has been designed to bring women and men, members of minority groups, protected veterans, and individuals with disabilities into all levels and segments of WSU's workforce in proportion to their representation in the qualified relevant labor market.

The EORR Plan, therefore, is a detailed, results-oriented set of procedures which, when carried out, results in full compliance with equal employment opportunity requirements through the equitable treatment of all people.

The manner in which this is to be accomplished becomes technical and somewhat complicated. There are several reasons for this. First, WSU is subject to and must address a variety of state and federal laws and guidelines dealing with equal employment opportunity and affirmative action. These guidelines and requirements are in themselves somewhat technical and complex. In addition, relevant court decisions, which are often useful in interpreting, but sometimes conflict with, these requirements and guidelines must be considered when developing and implementing the EORR Plan. Furthermore, in determining WSU's current equal employment opportunity and affirmative action position and its desired future achievements, numbers, percentages, statistics, and numerous calculations and computations must come into play.

The technical, legal, and mathematical aspects of the EORR Plan, however, all have one common purpose—to allow us to properly identify three key concepts:

1. Where we stand now,

2. Where we must go, and

3. How best to get there.

These three concepts *are* the EORR Plan.

Washington State University

All WSU Locations

PART I: EORR PLAN FOR MINORITIES AND WOMEN

FOR

January 1, 2024 - December 31, 2024

PART I

EORR PLAN FOR MINORITIES AND WOMEN TABLE OF CONTENTS

CHAPTER 1:	ORGANIZATIONAL PROFILE 41 C.F.R. § 60-2.11
CHAPTER 2:	ORGANIZATIONAL PROFILE 41 C.F.R. § 60-2.11
CHAPTER 3:	PLACEMENT OF INCUMBENTS IN JOB GROUPS 41 C.F.R. § 60-2.13
CHAPTER 4:	DETERMINING AVAILABILITY 41 C.F.R. § 60-2.14
CHAPTER 5:	COMPARING INCUMBENCY TO AVAILABILITY 41 C.F.R. § 60-2.15
CHAPTER 6:	PLACEMENT GOALS 41 C.F.R. § 60-2.16

ADDITIONAL REQUIRED ELEMENTS OF AFFIRMATIVE ACTION PROGRAMS

CHAPTER 7:	DESIGNATION OF RESPONSIBILITY 41 C.F.R. § 60-2.17(a)
CHAPTER 8:	IDENTIFICATION OF PROBLEM AREAS 41 C.F.R. § 60-2.17(b)
CHAPTER 9:	ACTION-ORIENTED PROGRAMS 41 C.F.R. § 60-2.17(c)
CHAPTER 10:	INTERNAL AUDIT AND REPORTING SYSTEM 41 C.F.R. § 60-2.17(d)

PART I: EORR PLAN FOR MINORITIES AND WOMEN

CHAPTER 1: ORGANIZATIONAL PROFILE
41 C.F.R. § 60-2.11

Workforce Analysis/Lines of Progression

WSU has created a workforce profile to identify employees at All WSU Locations by gender and race/ethnicity (as defined by the federal requirements) in each job title. The data was collected from pay roll records dated October 1, 2023.

Job titles are listed by organizational unit. Job titles are listed from lowest to highest paid. The list includes all job titles, including Civil Service, Administrative Professional, and Faculty employees.

For each job title, WSU identified the total number of employees, the number of male and female employees, the total number of minority employees, the male and female minority employees, the total number of employees who are White, Black, Hispanic, Asian, American Indian or Alaskan Native employees, Native Hawaiian or Pacific Islander, and Two or More races, and the male and female employees within each of these race/ethnic groups.

Lines of Progression

WSU does not have formal lines of progression; therefore, job titles are listed by organizational unit in order of wage rates (41 C.F.R. § 60-2.11(c)(3)).

See the Workforce Analysis for the results per organizational unit.

CHAPTER 2: JOB GROUP ANALYSIS
41 C.F.R. § 60-2.12

Although the workforce analysis was conducted individually for every job title, after it was completed, job titles were grouped for the comparison of incumbency to availability and for setting goals. There were several reasons for grouping jobs.

Many job titles are so similar in content that handling them individually in the EORR Plan is not necessary. Grouping together these very similar titles is appropriate for the comparison of incumbency to availability. For many job titles, the availability data that can be collected is limited, and the same data must be used for several related jobs. Therefore, grouping these related titles together is logical. Also, many job titles have so few incumbents in them that identifying disparities between incumbency and availability by job title is meaningless—as problem areas would be identified in terms of fractions of people. By grouping several similar titles and increasing the number of employees involved, a meaningful comparison can be conducted; any identified problem areas are more likely to be in terms of whole people. Consequently, goals established to correct problem areas are also more likely to be in terms of whole people.

The three reasons for grouping job titles all discuss "similar" or "related" jobs. That is the most critical guideline in creating job groups. Above all, the job titles placed into a job group must be more similar or related to each other than the job titles in other job groups.

Job groups must have enough incumbents to permit meaningful comparisons of incumbency to availability and goal setting. Ideally, if a job group is identified as containing a problem area, it should be large enough that a goal of at least one whole person can be established. No minimum size has been established for this purpose, however, since it is dependent not only on the size of the job group, but also on the size of the availability percentage and the number of minorities or women already employed in the job group.

WSU did not combine job titles with different content, wages, or opportunities if doing so would have obscured problem areas (e.g., job groups which combine jobs in which minorities or women are concentrated with jobs in which they are underrepresented).

CHAPTER 3: PLACEMENT OF INCUMBENTS IN GROUPS
41 C.F.R. § 60-2.13

Each job group appears on a Job Group Report with a job group name and number. The report lists each job title in the job group. For each job title, the worksheet provides the following information: EEO reporting category, job title, employee headcounts for each job title, and overall percentages by gender and race/ethnicity as of October 1, 2023.

See the Job Group Analysis for the listing of the job titles and the associated race and gender headcounts per job group.

CHAPTER 4: DETERMINING AVAILABILITY
41 C.F.R. § 60-2.14

"Availability" is an estimate of the proportion of each sex and race/ethnic group available and qualified for employment at WSU for a given job group in the relevant labor market during the life of the EORR Plan. Availability indicates the approximate level at which each race/ethnic and sex group could reasonably be expected to be represented in a job group if WSU's employment decisions are being made without regard to gender, race, or ethnic origin. Availability estimates, therefore, are a way of translating equal employment opportunity into concrete numerical terms. Correct comparisons of incumbency to availability, worthwhile and attainable goals, and real increases in employment for problem groups depend on competent and accurate availability analyses. With valid availability data, we can compare the percentages of those who could reasonably be expected to be employed versus our current employment (from the workforce analysis), identify problem areas or areas of deficiency, and establish goals to correct the problems.

Steps in Comparison of Incumbency to Availability

Identify Availability Factors

The following availability factors are required of federal government contractors for consideration when developing availability estimates for each job group:

1. External Factor: The external requisite skills data comes from the 2014-2018 American Community Survey (ACS) Census of Population data.
    A. Reasonable labor area:

Job Group		Recruitment Area
10	Central Administration	National
11	Administration I	National
12	Administration II	National/State
13	Administration III	National/State
20	Dept/Program Chair or Director	National
21	Instructional Faculty	National
22	Research Faculty	National
30	Student Affairs	State/Local
31	Publications/Comm/PR/Development	State/Local
32	Science & Health	State/Local
33	Computer Specialist	State/Local
34	Financial Specialists	State/Local
35	Engineers and Architects	State/Local
36	Other Professional Non-Faculty	State/Local
37	Coaches	National
38	Librarians	National
39	Extension Specialists	State/Local

40	Administrative Support	State/Local
41	Secretaries and Assistants	State/Local
42	Finance Records Assistants	State/Local
43	Librarian Assistants	State/Local
51	Electronic/Engineering Technicians	State/Local
53	Ag/Biology/Field Technicians	State/Local
54	Other Technicians	State/Local
60	Mechanics and Repairers	State/Local
61	Construction	State/Local
62	Other Crafts	State/Local
71	Operators	State/Local
72	Police/Security	State/Local
73	Food Services	Local
74	Custodial Services	Local
75	Farm/Grounds Workers	Local
76	Other Service/Maintenance Workers	Local

2. Internal Factor: The percentage of minorities or women among those promotable, transferable, and trainable within the contractor's organization. See the Internal Availability Analysis for more detail.

Assign Internal and External Factor Weights: Weights were assigned to each factor for each job group. A combination of historical data and experience were used to determine the weights.

Weights were never assigned in an effort to hide or reduce problem areas.

Identify Final Availability: Weights were multiplied by the component-specific data to produce weighted data for each component. Weighted data for each component was summed. This produced a final availability estimate for each sex and race/ethnic group, as well as for minorities in the aggregate.[1]

See the ***Availability Analysis*** for the availability breakdown for each job group.

[1] In most cases, the final availability report (and most other technical reports in this EORR Plan) only includes data/information for females and minorities in the aggregate.

CHAPTER 5: COMPARING INCUMBENCY TO AVAILABILITY
41 C.F.R. § 60-2.15

Once final availability estimates were made for each job group, WSU compared the percentage of incumbents in each job group to their corresponding availability. A comparison was made between the percentage employed as of October 1, 2023 and that group's final availability.

See the ***Comparison of Incumbency to Availability*** for the results per job group.

CHAPTER 6: PLACEMENT GOALS
41 C.F.R. § 60-2.16

WSU has established an annual percentage placement goal whenever it found that minority or female representation within a job group was less than would reasonably be expected given their availability. In each case, the goal was set at the availability figure derived for women and/or minorities, as appropriate for that job group. These goals take into account the availability of basically qualified persons in the relevant labor area. They also take into account anticipated employment opportunities with our organization. Goals are not rigid and inflexible quotas which must be met, but are instead targets reasonably attainable by means of applying every good faith effort to make all aspects of the entire EORR Plan work. These goals will be reached primarily through recruiting and advertising to increase the pool of qualified minority and female applicants and through implementation of our action- oriented programs (see Chapter 9). Selections will occur only from among qualified applicants. Goals do not require the hiring of a person when there are no vacancies or the hiring of a person who is less likely to do well on the job ("less qualified") over a person more likely to do well on the job ("better qualified"), under valid selection procedures. Goals do not require that WSU hire a specified number of minorities or women.

A goal is a guidepost against which WSU, a community group, or a compliance agency can measure progress in remedying identified deficiencies in WSU's workforce. By setting realistic goals, WSU should be able to meet the goals, assuming we conduct effective recruitment and advertising efforts to ensure an adequate pool of qualified minority and/or female applicants.

See the ***Placement Goals*** report for each job group and the ***Goals Progress Report*** for progress made since the previous EORR Plan.

CHAPTER 7: DESIGNATION OF RESPONSIBILITY
41 C.F.R. § 60-2.17(a)

As part of its efforts to ensure equal employment opportunity to all individuals, WSU has designated specific responsibilities to various staff to ensure the EORR Plan focuses on all components of the employment system. To that end, the WSU President, the Chief Human Resource Officer, the Director for CCR, and those employed as supervisors and managers have undertaken the responsibilities described below.

WSU President

The primary responsibility and accountability for implementing the EORR Plan rests with the WSU President. This person is responsible, through the Vice President and Chief Human Resource Officer (CHRO), the Director of Compliance and Civil Rights (CCR), and managers/supervisors, for adherence to WSU's policy of equal employment opportunity and affirmative action. This role includes, but is not limited to, the following duties:

1. Designating appropriate personnel with the responsibility for overseeing, administering, implementing, and monitoring WSU's EORR Plan.

2. Ensuring that those designated personnel responsible for all EORR Plan components are given the necessary authority and top management support and staffing to successfully implement their assigned responsibilities.

3. Imparting personal direction that ensures total involvement and commitment to equal employment opportunity programs through WSU's EORR Plan.

In Spring 2024, WSU's Board of Regents is undergoing a search for a new university president using the Equity Impact Assessment Tool developed by the WSU Task Force on Equitable Policy and Practice, recognizing that equitable outreach, recruitment, and retention are top-down priorities.

Chief Human Resource Officer

The CHRO is responsible for overall supervision of the implementation of personnel processes and other human resources functions. The CHRO's responsibilities include, but are not limited to, the following:

1. Ensuring that WSU Human Resource Services (HRS) staff adhere to the stated policy of equal employment opportunity and monitor the application of equal employment opportunity policies in personnel processes and other human resources functions.

2. Participating in periodic discussions with managers, supervisors, and all others involved in personnel processes to ensure EORR Plan and equal employment opportunity policies are being followed.

3. Ensuring that transfer and promotion processes include a review of qualifications to ensure equitable opportunity, based on job-related employment practices.

4. In partnership with CCR, and relevant departments as appropriate, conducting periodic reviews of: a) training programs and hiring and promotion patterns, b) facilities, and c) sponsored educational, training, recreational, and social activities to ensure these programs and activities are conducted

consistent with WSU's equal opportunity policies.

Ensuring that all new employees receive information about WSU's Equal Employment Opportunity Policy (Executive Policy 12) and the Policy Prohibiting Discrimination and Harassment (Executive Policy 15), as well as ensuring that all employees take the Employee Rights & Responsibilities Under Executive Policy #15 training, as required by WSU policy and directive of the WSU President.

5. Periodically analyzing applicant flow to determine the mix of persons applying for employment by race/ethnic origin and gender.

6. Periodically analyzing whether advertising is placed in minority and female-oriented publications, as applicable.

7. Reviewing, and assisting managers and supervisors in reviewing, staff job descriptions and specifications, as well as faculty notices of vacancy, to ensure they are free of discriminatory provisions and artificial barriers, that all requirements are job-related, that they are realistic, and that they reflect the actual work requirements of the essential job duties.

8. Ensuring that notice is periodically sent to all departmental human resource contacts of posters and policies required to be displayed. Human Resource Services also maintains a webpage that indicates the location of designated campus areas for required display of posters.

9. Conducting periodic salary reviews to aid equity and retention (*see* BPPM 60.12) and providing support to the Office of the Provost to monitor and approve faculty salaries.

Compliance and Civil Rights

CCR is responsible for monitoring the University's EEO program and policies. CCR's responsibilities include, but are not limited to, the following:

1. Providing information and technical assistance to WSU's employees, as necessary, regarding WSU's equal employment opportunity and affirmative action commitments.

2. Ensuring that WSU's EORR Plan is reviewed and updated at least on an annual basis in accordance with stated policy.

3. Designing and monitoring the implementation of the EORR Plan.

4. Periodically reviewing and identifying improvement opportunities to provide technical assistance to departments through assessment of the effectiveness of the equal employment opportunity programs.

5. Advising management in the modification and development of WSU's policies to ensure the enhancement of equal employment opportunity for all employees and potential employees within existing equal employment opportunity guidelines.

6. Providing compliance guidance to departments related to WSU's equal employment opportunity policies and EORR Plan.

7. Assisting in review and revision of all relevant policies, procedures, and rules to ensure they are not in violation of federal or state equal opportunity laws and regulations.

Managers and Supervisors

In their direct day-to-day contact with WSU's employees, managers and supervisors have assumed certain responsibilities to help WSU ensure compliance with equal employment opportunity programs and effective implementation of the EORR Plan. These include, but are not limited to, the following:

1. Adhering to WSU's equal employment opportunity and affirmative action policy.

    A. Supporting and assisting the CHRO and the Director of CCR in developing, maintaining, and successfully implementing the EORR Plan.

    B. Taking action to prevent discrimination and harassment of employees.

2. Encouraging employees to seek opportunities that might lead to greater personal growth and value and counseling them on paths for upward mobility within the employment structure.

3. Ensuring that all interviews, offers of employment and/or wage commitments are consistent with WSU's policy.

4. Implementing the internal promotion and transfer of all employees under their supervision consistent with EORR Plan goals and objectives and WSU employment policies.

5. Assisting in identifying problem areas and providing necessary information for establishing and meeting department affirmative action goals and objectives.

6. Encouraging search committee members to utilize the recruitment training and toolkit provided by HRS.

CHAPTER 8: IDENTIFICATION OF PROBLEM AREAS
41 C.F.R. § 60-2.17(b)

Terminology

The phrases "comparison of incumbency to availability," and "problem area" appearing in this chapter are terms WSU is required by government regulations to use. The criteria used in relation to these terms are those specified by the government. These terms have no independent legal or factual significance. Although WSU will use the terms in good faith in connection with its EORR Plan, such use does not necessarily signify the university agrees that these terms are properly applied to any particular factual situation and is not an admission of non-compliance with EEO laws, regulations, and objectives. Whenever the term "goal" is used, it is expressly intended that it "should not be used to discriminate against any applicant or employee because of race, color, religion, gender, or national origin," as stated in Title 41 Code of Federal Regulations, Part 60-2.16(e).

In addition to comparing incumbency to availability within job groups, WSU has conducted studies to identify problem areas in each of its selection procedures (i.e., hires, promotions, and terminations). WSU will continue to monitor and update these studies during each EORR Plan year. In each case where potential problem areas have been identified, affirmative action, as appropriate, will be taken consistent with any of the action-oriented programs described in Chapter 9 of this EORR Plan.

Goals are established within each of the job groups at no less than the current availability data for the job group.

41 C.F.R. § 60-2.17(b)(1): Workforce by Organizational Unit and Job Group

An analysis of minority and female distribution within each organizational unit was accomplished by a thorough investigation of the Workforce Analysis.

An analysis of minority and female utilization within each job group was accomplished by a thorough investigation of the Comparison of Incumbency to Availability reports.

41 C.F.R. § 60-2.17(b)(2): Personnel Activity

Applicant flow, hires, promotions, and terminations were analyzed by job group. An analysis of selection disparities in personnel activity between men/women and whites/minorities was accomplished by a thorough examination of transaction data.

See ***Summary of Personnel Transactions Report*** for each job group.

41 C.F.R. §60-2.17(b)(3): Compensation Systems

Compensation analyses were conducted by comparing the salaries for men v. women, and whites v. minorities in each *job title/job group/paygrade.*

CHAPTER 9: ACTION-ORIENTED PROGRAMS
41 C.F.R. § 60-2.17(c)

WSU tailors action-oriented programs each year to ensure they are specific to the problem identified.

Action-Oriented Program (AOPs):

The action-oriented programs designed to address the underutilization of women and minorities, the utilization goal set for individuals with disabilities, and the hiring benchmark for the protected veterans are listed below. These action-oriented programs will be carried out throughout the EORR Plan year.

Evaluation of these AOPs will be conducted at least annually. The CHRO, with the help of managers and supervisors, will be responsible in ensuring that the following are implemented.

Outreach:

1. WSU will continue to place advertisements on job opportunities through local job service offices. Positions advertised through the WSU Jobs portal are automatically routed to the local job service office.

2. Due to the extensive technical education and experience required for some positions, WSU will also continue to place job opportunity announcements in the WSU Jobs website, and in diverse regional, national, and topical job advertising sources when appropriate.

3. WSU will continue to encourage departments to utilize discipline specific advertising sources and other position specific targeted recruitment strategies. WSU provides Equity Resources to broaden candidate pools.

4. WSU will educate managers and supervisors about their utilization goals and encourage commitment to equal opportunity policies and goals.

5. Advertisements will always carry the Equal Employment Opportunity clause.

6. Minority and female applicants will be considered for all positions for which they are qualified.

7. WSU will continue to advertise job postings that include the full salary ranges available for positions and identify any available remote and hybrid remote/onsite options.

Recruitment:

1. Develop position descriptions that accurately reflect position functions and are consistent for the same position within the organizational unit. WSU will continue to encourage departments to assess their position descriptions for consistency from one location to another.

2. WSU will continue to encourage departments to develop or revise job or worker specifications to ensure that they contain academic, experience, and skill requirements that do not constitute inadvertent discrimination. Develop specifications that are free from bias with regard to legally protected classes.

3. Approved position specifications and worker specifications will be made available to all members of management involved in the recruiting, screening, selection, and promotion process. Copies of notices of vacancy may also be made available to recruiting sources.

4. WSU will continue to use only worker specifications that include job-related criteria.

5. WSU will continue to encourage departments to carefully select and counsel all personnel involved in the recruiting, screening, selection, promotion, disciplinary, and related processes to eliminate bias in all personnel actions. WSU provides implicit bias trainings and other recruitment resources to search committees, including Addressing Unconscious Bias During Recruitment.

Retention:

1. WSU will continue to post or announce job opportunities. WSU's Job Posting Policy System requires postings of all Civil Service, Administrative Professional and Tenure- Track Faculty positions up to the Senior Management level (see *BPPM 60-17* for limited exceptions).

2. All employees, including women and underrepresented minorities, are encouraged to use university facilities and participate in officially sponsored social and recreational activities.

3. All employees, including women and underrepresented minorities, can choose training courses through WSU's Percipio training catalog and include them in their career development plans; trainings include How to Be an Ally for Diversity and Inclusion, Cultivating Diversity, Inclusion, and Belonging at Work, Zachary Wood on Having Uncomfortable Conversations about Sensitive Issues, and Dr. Jennifer Eberhardt on Uncovering the Hidden Prejudice that Shapes What We See, Think, and Do. WSU also offers a Community and Equity Certificate Program, a professional development opportunity available to all WSU faculty and staff. The Community & Equity Certificate lays the groundwork for a challenging, personal journey for individuals who are committed to creating equitable and inclusive environments. Through the certificate program, faculty and staff expand their understanding of equity-mindedness and build a toolkit for engaging more effectively with students, colleagues, and community partners. Faculty and staff must complete seven workshops across four areas to earn the certificate. Additionally, WSU celebrates and commemorates Women's Equality Day, Universal Human Rights Awareness Month, Pride Month, Juneteenth, American Businesswomen's Day, World Day for Cultural Diversity, National Disability Independence Day, National Day of Racial Healing, and other days and months of cultural and historical

awareness and recognition.

4. Qualified employees can request release time for trainings for professional development or to improve their job skills.

5. Tuition waivers are offered to all eligible employees on a space available basis. *See BPPM 60.70 for eligibility requirements and limitations.*

6. WSU will provide support and resources benefitting employee health and well-being, including access to an Employee Assistance Program with confidential counseling and referral services, WellCoug comprehensive employee wellbeing program, and competitive benefits, including insurance and retirement plans.

Many WSU campuses, colleges, and departments have developed additional programs, events, and initiatives to promote diversity, equity, and inclusion (DEI) in their recruitment and retention efforts, including:

College of Pharmacy and Pharmaceutical Sciences (CPPS)

- CPPS completed a DEI academic inventory with the goal of understanding what academic activities and lectures within CPPS curriculum were integrating DEI topics either directly or peripherally. CPPS conducted semi-structured faculty interviews to better direct its trainings, resources, and guidance for improvement of faculty's DEI activities.
- CPPS created a Student DEI Award to celebrate students demonstrating significant contributions to promoting DEI in the community.
- CPPS added a vocabulary ice breaker to its orientation week to introduce medical terminology and application in pharmacy and create an equitable foundation for students who were less familiar with the English language or had less medical experience.
- CPPS created a new DEI website with specific resources to help students, staff, and faculty better understand DEI. This included resources in equitable pedagogy, social determinants of health, connections to WSU diversity resources for students, and holistic student support, etc.

Office of the Provost

- The office continues the Cluster Hire initiative, which is currently in its fourth cycle. This search is focused on food and environmental justice. To date, this initiative has led to the hiring of 15 tenure-track faculty, 13 of whom are faculty of color, and all of whom do publicly impactful/community-engaged scholarship focused on some aspect of racism and social inequality in the Americas. The program is led by Lisa Guerrero, Vice Chancellor for Equity and Inclusive Excellence, WSU Pullman. The initiative includes funding for new positions; trainings on best practices in creating notices of vacancy, recruiting, hiring, and mentoring faculty; the cost for each faculty member hired under the initiative to enroll in the Faculty Success Program led by the National Center for Faculty Development and Diversity; regular mentoring meetings with each new cohort of the cluster hire, as well as other faculty from minoritized groups.
- Beginning in Fall 2023, WSU was chosen to become part of the fifth cohort of the IChange Network, part of the ASPIRE Alliance through NSF in partnership with APLU. WSU's project is focused on changing departmental culture across the university, and particularly within STEM disciplines, in ways that support the recruitment, hiring, and retention of faculty from historically minoritized communities, with a focus on early-career women and faculty of color. We have two targeted and interrelated objectives. The first is to implement on a university scale several successful initiatives that are currently implemented only in some departments. Those initiatives include, for example, implicit bias trainings, the creation of mentoring networks, faculty development workshops in inclusive pedagogy, and trainings in methods to create welcoming and supportive departmental cultures. The second is to expand traditional concepts of successful scholarship to include topics, methods, and goals that faculty from minoritized communities are more likely to pursue but that have less scholarly credibility in some disciplines. For example, strong, high-quality community-engaged scholarship may have regional impact but not the national or international impact required by standard promotion and tenure guidelines. Similarly, interdisciplinary scholarship requires substantive contributions from many team members, and first or sole authorship is not the important marker of contribution it is in more traditional paradigms. The team leaders of the cohort are Lisa Guerrero, Vice Chancellor for Equity and Inclusive Excellence, WSU Pullman, and Anna Plemons, Associate Vice Chancellor for Academic and Student Affairs, WSU Tri-Cities. The larger

team is made up of college and departmental leadership from across the WSU system.

Finance and Administration (F&A)

- F&A included the equity lens tool developed for policy review as a guiding principle for the fiscal year 2025 budget development hearings.
- F&A included the assistant vice president for budget and planning, university controller, and director of real estate and business operations positions on job boards and sites serving underrepresented communities.
- Policies, Records, and Forms revised WSU's policy on internal rulemaking to formally incorporate WSU's equity lens tool as a requirement in the rulemaking (WAC) process.
- Facilities Services staff is actively engaged in support of diverse/small businesses through both legislative stakeholder work and project procurement practices. Facilities Services staff co-chaired the Capital Projects Advisory Board and co-authored the Business Equity/Diverse Business Inclusion Report to the state legislature.
- Facilities staff helped lead state certification of small businesses by the Office of Minority and Women's Business Enterprises.
- Facilities piloted a design build under $2M to expand the market for traditional public works contractors and designers into alternative procurement, and WSU is the only public owner in Washington authorized to do so. Facilities developed alternative, modified contract requirements more responsive to needs of diverse/small businesses in procurement and execution of public works contracts. Facilities also piloted prompt pay for trade partners in the design build project and sponsored industry discussions on practices to support diverse/small businesses in design and construction.
- Compliance and Civil Rights provided trainings and communications on the WSU Policy Prohibiting Discrimination and Harassment and civil rights laws and obligations to the university community, provided technical guidance on compliance obligations system-wide, and responded to reports of non-inclusive practices or discrimination with formal grievance procedures and/or supportive measures intended to preserve equitable access to educational and employment programs or activities.

Athletics

- Athletics developed a four-year Diversity, Equity, Inclusion, and Belong (DEIB) plan; year one was designed to establish and educate, year two was designed for action and accountability, year three was designed for growth and gratitude, and year four was designed to embed and excel.
- During the first year, 2023-2024, Athletics focused on establishing a clear DEI curriculum expectation for the athletic department and creating an Athletics Diversity and Inclusion Designee (ADID) position, Assistant Athletic Director, Inclusion and Belonging, to lead DEI efforts for Athletics by reviewing current DEI practices, policies, and initiatives, making updates/revisions to the DEI plan, helping to establish a baseline to measure department DEI progress, and educating staff and student-athletes on what DEIB looks like in the athletics landscape. In November 2023, Athletics submitted a DEIB Attestation to the NCAA.
- The Athletics DEI Council Education Committee initiated a monthly Book Club and shares book chapters pertaining to a specific DEIB topics with Athletics staff. Athletics provides optional meeting times for staff to come and further discuss the books and topics in greater detail.
- Tori Ector, Assistant AD, Inclusion and Belonging, has set up a variety of Lunch and Learn sessions where guest speakers discuss various DEIB topics with Athletics staff.
- The Athletics DEI Unit meets weekly/bi-weekly with Employee Experience and Personnel Services

to review and implement various DEIB strategies for staff recruitment, engagement, and retention.

- Athletics will be implementing additional in-person and online DEIB trainings for staff, including additional implicit bias training for search committees.
- Athletics staff participate in various student-athlete DEIB groups, including the Black Student Athlete Association, the Cougar Pride Student-Athlete Alliance, and the Asian American & Pacific Islander Student Center.

WSU Everett (WSUE)

- WSUE is revising its strategic plan, Fulfilling the Promise - 2017 – 2027, to include DEI objectives and strategies within the plan's 6 themes: Improved Education Access; A Culture of Excellence; Active Learning, Student Engagement; Public-Private Partnerships; and Organizational Capacity & Sustainability, Institutional, Local and Global Impact.
- ASWSUE (student government) created a diversity committee and initiatives that promote equity and inclusion within the EverCoug community and the broader WSU System. ASWSUE sent a student to the American Indigenous Business Leaders Conference March 2024. On February 28, 2024, ASWSUE hosted a Portraits of Power event, an immersive, educational painting experience for students to engage with the stories of Black leaders, in celebration of Black History Month. ASWSUE's DEI director also invited students to a screening of Killers of the Flower Moon in celebration of Indigenous People Day.
- All WSUE meetings with external stakeholders begin with a Native American Land Acknowledgement.
- Through the generosity of two donors, WSUE created the Native American Student Excellence Fund to elevate and expand opportunities for Native American students on campus. The fund will support projects/programs/educational materials and technology specifically aimed at supporting Native American student recruitment, retention, and success; engaging with Native American communities, which could include summer bridge camps, recruitment outreach and campus events; enhancing campus offerings for Native American students through programming and facilities; and collaborating on projects/efforts with the WSU Office of Native American Programs and/or the WSU Tribal Liaison.
- WSUE partnered with Everett Community College to launch a Degree Partnership Program (DPP). The DPP promotes bachelor's degree completion by allowing students to be jointly admitted and concurrently enrolled at WSUE and Everett Community College. DPP will increase accessibility and affordability of a bachelor's degree for a wider range of students, target student support and advising, and streamline the credit transfer process.
- On October 19, 2024, WSUE hosted a panel on Tribal Sovereignty in Research and Community Engagement Initiatives.
- On March 21, 2024, WSUE Chancellor Pitre served as a panelist for the Students of Color Career Conference at Everett Community College. This one-of-a-kind conference brought middle school and high school students from across western Washington to network with professionals of color and discuss college and career readiness.
- On April 18, 2024, WSUE hosted a talk by Dr. Carolyn Finney, author of Black Faces, White Spaces. Dr. Finney shared her research on the racial dynamics in environmental spaces, emphasizing African Americans' unique experiences and perspectives in national parks and forests.
- In celebration of the National Day of Racial Healing, on January 16, 2024, WSUE hosted a macrame braiding event presented by Robin Wall Kimmerer, author of Braiding Sweetgrass: Indigenous Wisdom, Scientific Knowledge, and the Teachings of Plants.

College of Veterinary Medicine (CVM)

- Maurice Cottman, CVM's DEI director, created and facilitated an implicit bias webinar for the Washington State Veterinary Medical Association, allowing licensed veterinarians to satisfy mandatory equity training requirements. Director Cottman facilitated DEI-focused workshops and conferences, including the American Association of Bovine Practitioners, the Have You Heard? podcast, the Washington State Veterinary Medicine Association, the Minorities in Agriculture, Natural Resources, and Related Sciences, and the Inclusive Vet Med Symposium.
- Director Cottman became the newest advisor for the Student American Veterinary Medical Association.
- CVM offered a series of community engagement events; including a community dinner during holiday breaks for students, faculty, staff and Pullman/Moscow residents; Mental Health Grab Bags/Meet & Greets; CVM Connects - The goal of this forum series is to create a space where participants can come together, connect, and participate in educational discussions; and sponsored events through the CVM's DEI department.
- CVM created of new student employment opportunity called the CVM Student Ambassadors for Equity.
- CVM collaborates with WSU Pullman's Multicultural Student Services and the Association of American Veterinary Medical Colleges, and the Washington State Veterinary Medical Association in DEI initiatives, fireside chats, DEI community meetings, newsletters, conference planning, and bylaws creation and maintenance.
- CVM created a Diversity, Equity, and Inclusion Fund for the Advancement of Veterinary Medicine.
- CVM revamped its Doctor of Veterinary Medicine admissions process to ensure more equitable and transparent review of applicants. The review process is intended to enhance access to the program by incorporating a more consistent approach to identifying candidates who have faced a range of challenges and/or barriers to academic success. CVM also adopted a clearer and more inclusive technical standards policy for the program to reduce unnecessary barriers for individuals with a range of disabilities.
- CVM's Graduate Education Peer Mentor Program assists with recruitment and retention, fostering a sense of belonging, providing additional opportunities to connect and network, nurturing a culture of inclusion and cohesion, cultivating a welcoming and supportive environment (particularly for first-year graduate students), assisting in mental and emotional wellbeing, building professional and leadership opportunities, encouraging a culture of family and unity, and breaking down programmatic silos to build a unified graduate education community.
- CVM's Leadership and Professional Series for students, faculty and staff is designed to continue education, learning, personal and professional growth for those in biomedical research sciences, particularly graduate students. The series includes training on DEI and wellness, including Iimplicit bias, microaggressions, mindfulness-based antiracism, privilege and power, and social and emotional wellness.
- CVM supports WSU's MARC and MIRA-ESTEEMED programs for PHD-seeking students who are considered underrepresented in the biomedical sciences.
- CVM awarded the first Simasko Yearly Neuroscience Award Program for Sophomores, a scholarship targeted to second-year undergraduates who are first-generation college students or from backgrounds underrepresented in the sciences.
- CVM Teaching Academy hosts a book club reading What Inclusive Instructors Do by TM Addy, D Dube, KA Mitchell, and M SoRelle, a text about inclusive teaching. Participants include faculty who teach at all levels, didactic and clinical teachers, grad students, residents, and members of the counseling team.

Office of Research (OR)

- OR senior staff conducted a DEI Minute during each staff meeting to educate staff on specific DEI events and initiatives.
- Kim Christen, Associate Vice President for Research Advancement and Partnerships, developed a DEI plan for OR, which included creating a DEI statement, creating programs to support underrepresented groups, and appointing a faculty fellow with a DEI focus.
- OR requires staff to take training on overcoming unconscious bias, requires units to review position descriptions to root out bias, and encourages professional development opportunities, such as internal, technical cross training and sponsored conference attendance.

College of Education (CoE)

- CoE's equity and inclusion (E&I) committee develops supports and resources for its faculty, staff, and students, CoE presents a series for faculty and graduate students called E&I Critical Conversations, and CoE provides an E&I Mini Grants program for faculty, staff, and students.
- CoE updated the learning objectives for their program to incorporate awareness and evaluation of diversity and the influence on research. This includes research training, civil discourse and DEI training, and implicit and historical bias training.
- Educational Psychology faculty worked with Associate Dean Amir Gilmore to provide a listening session for students.
- Kinesiology formed a diversity committee to review the program and impacts on the recruitment and retention of women, people of color, and other marginalized populations.

WSU Tri-Cities (WSUTC)

- WSUTC HRS developed a New Employee Orientation for all WSU Tri-Cities employees who have been in their roles a year or less. The program allows new employees to connect with campus leadership, including the chancellor and the chancellor's leadership team. The program also builds community and sense of belonging for participants.
- WSUTC utilized a third-party recruitment firm to intentionally post staff and faculty jobs on diverse job boards, improving applicant pool diversity.
- Campus best practices include providing interview questions to candidates in an accessible way, which may include sending the questions before an interview, typing questions into the chat function on a virtual interview, or providing a hard copy for in-person interviews.
- The campus demographic statement continues to be a mandatory part of all job ads.
- WSUTC established a faculty and staff affinity group to support retention and belonging.
- During the 2023-2024 academic year, WSUTC hosted three sessions of CCR's faculty and staff training on student disability accommodations. WSUTC also hosted a training on the Student Care Network.
- In 2023, the American Council on Education Leaner Success Lab process concluded, the final report was printed and distributed, and the report was socialized/workshopped at the fall Academic and Student Affairs retreat. The final report is orientation on the Five Institutional Commitments that center equity.
- The Inclusion, Diversity, Equity and Access committee reimagined its mission statement, criteria for service, and process for outreach/on-boarding, which include foundational concepts and continuous learning.
- WSUTC's Access Services Faculty Liaison group was organized under the leadership of the Access Services & Testing Manager in Spring 2023 and comprises of WSUTC faculty, instructors, and

teaching assistants who are dedicated to providing an inclusive environment for students in their courses. The 2023-2024 academic year marked the full launch of the group.

- Access Services & Testing launched an online orientation for faculty that can be completed in Canvas: Access Services Essentials. Access Services & Testing also offered four in-person Faculty Orientations: College of Nursing, Biological Sciences (offered twice), College of Arts & Sciences
- Staff members from Access Services and the MOSAIC Center for Student Inclusion offered the Community & Equity Program Course, Equity 101, for Gear Up staff for the second year and added Equity 102 for Gear Up for the first time this year.
- WSUTC recognized Women of Distinction for the seventh year.
- WSUTC staff contributed to the WSU's system's National Day of Racial Healing program for the second year in a row.
- WSUTC hosted several campus events that were open to the public, including a Dia De Los Muertos event, in partnership with the Tri-Cities Hispanic Chamber of Commerce, and the Gender-Fluid Closet, in partnership with Uptown Rainbow Connection.
- WSUTC hosted the Multicultural Graduation Celebration, formerly the Raza Graduation, for the second year.
- WSUTC hosted an art exhibit and speaker series called Rooted: Irwin Nash Photographs of Yakima Valley Farmworkers, which included participation of two WSU regents, a Washington State Human Rights Commissioner, and a prominent civil rights lawyer.

Washington Small Business Development Center (SBDC)

- In 2023, SBDC self-selected underserved communities as a reported deliverable focus area for small businesses receiving the technical assistance that SBDC team members provide. This includes those who identified as Asian American, Black and African American, Hispanic and Latino, Middle Eastern, North African, Other Persons of Color, Alaska Native, Native American, Native Hawaiian, Pacific Islander, Tribal Communities, Having Disabilities, Lesbian, Gay, Bisexual, Transgender & Queer (LGBTQ+), Religious Minorities, Living in Rural or underserved Urban areas, Veterans, Military Servicemembers and Spouses, Women, and those who are otherwise adversely affected by persistent poverty or systemic inequality.
- SBDC focused on language services, cultural sensitivity, and authenticity; providing ongoing professional development to help team members identify and address barriers that disproportionately impact historically underrepresented and excluded groups.
- SBDC's pilot Inclusivity Project continues to expand SBDC's reach to Spanish-speaking small businesses and focuses on the following pillars for growth: advisor collaboration, partnerships, trainings, increased resources, and America's SBDC Special Interest Group, which brings WSU advisors and others from around the country together to foster open discussions, share resources and best practices, and explore better ways to support each other in growing outreach programs.

WSU Global Campus (WSUGC)

- WSUGC's DEIB committee created a Diversity, Equity, Inclusion, and Belonging Strategic Plan to guide training, hiring, and communication plans. The plan was informed by a DEIB employee survey, done in conjunction with the Office of Outreach, and integrated into the overall WSUGC Strategic Plan.
- WSUGC supports a full-time position that promotes student wellness, approved the hiring of a fulltime Director of Diversity and Employee Engagement, and funds a fulltime position that supports ADA compliance and best-practices in online and digital access through proactive evaluation of programs and digital collateral.

- The WSUGC Assistant Vice Chancellor for Strategic Partnerships participates in several systemwide DEIB committees and task forces. Participation ensures WSUGC is aligned with WSU system best practices and provides input about the unique needs of WSUGC students, staff, and faculty.
- WSUGC has begun a redesign of the diversity website to be broadly inclusive, accessible, and informative for internal and external audiences.
- WSUGC monitors DEI and discrimination and harassment training completions and is proactive to ensure staff are up to date with these trainings.
- WSUGC appointed two new Advisory Board Members, one representing tribal communities and the other representing military and veteran perspectives, to better serve those populations with our programs.
- WSUGC joined the Washington State Workforce Training and Education Board in submission of a legislative budget item and legislative bill focused on digital equity in Washington State (HB2360).
- WSUGC nominated and supported employees to hold leadership positions and membership on equity-focused commissions and committees at WSU.
- WSUGC ensured an equity and inclusion mindset through appointment of DEI officers and programming in ASWSU Global leadership and Global Connections student activities.
- WSUGC identified the Equity Assessment Tool as an important component of policy and marketing evaluation and will implement it in 2024.
- WSUGC has purposeful partnerships with entities, such as WSU Tribal Relations, to ensure access and service to historically excluded rural, tribal, and first-generation communities through relevant credit and non-credit programs.

WSU Police Department

- Police officers take elective trainings including Introduction to the Historical Intersection of Race and Policing; People First: Awareness, Challenges, and Response to Poverty and Recidivism; The Criminal Legal System: Structural Inequalities, Monetary Sanctions, Policy; and Reform; Understanding the Diversity and Complexity of Asian and Asian American Communities; and LGBTQ+ Core Competency.

Student Affairs, WSU Pullman

- Student Affairs launched a comprehensive, standardized onboarding experience to support managers in hiring and improving new employee engagement, integration, and experience as they transition into their new role and team. Onboarding provides increased team interaction, well-being, mentorship, fitness, and other resources in the hands of new employees to improve engagement and retention. Student Affairs requires supervisors and managers to undergo trainings on DEI hiring practices and equal opportunity issues. Student Affairs hosted its inaugural Training Day during the summer of 2024. This twice annual, all-day event for staff at all levels of responsibility includes topics focused on diversity, equity, inclusion and belonging.
- Student Affairs departments offer programing and training designed to foster inclusion and allyship; including LGBTQ+ Ally Training; Disability Allyship, Advocacy, and Activism Training; Administrative Professional Advisory Council DEI Mastermind Group; and the annual Disability Symposium; and Diversity, Equity, Inclusion, and Justice Summits, biannual events to showcase how WSU is advancing DEI initiatives. Student Affairs works to ensure search committee members have all gone through training related to implicit bias to ensure equitable hiring practices for staff members.

- Health Education provided Mental Health First Aid and Check Up from the Neck Up trainings to help students and employees address barriers related to mental health challenges, help them understand cultural differences in definitions of mental health, and help people access supportive services. Health Education also provided violence prevention programs to empower students to recognize warning signs and take action to reduce gender-based violence, which disproportionately impacts women, women of color, and members of the LGBTQ+ community.
- The LGBTQ+ Center creates a space and community for students and offers programming that celebrates the intersectionality that our students bring. There are also informal collaborations with the Gender Identity and Expression and Sexual Orientation Commission, the faculty and staff affinity group. The LGBTQ+ Center also hosted Q*Hort at the start of the semester to welcome new LGBTQ+ students to the campus community and hosted Queering the Archives community events in partnership with the WSU Libraries each semester, with an average of 30 attendees per event. Attendees ranged from faculty, staff, students, and community members.
- The Center for Community Standards (CCS) requires all board members and conduct officers to complete diversity, equity, inclusion, and implicit bias training at least once every two years to hear any community standards cases. CCS recommends that conduct advisors complete the same training. CCS considers how outcomes may disparately impact students in its determination of appropriate sanctions. CCS provides information to all students about access to disability-related accommodations in the community standards process and interpreter services, which are provided at no expense to the students. CCS actively refer any incidents of alleged acts of bias/discrimination/harassment to CCR and we provide CCR contact information to student inquiring about reporting of such incidents. CCS has internally audited sanctions to ensure the highest rate of accessibility for students from various backgrounds. CCS offers all of our most commonly assigned sanctions free of charge to decrease disparate impact that a fee may cause. CCS provides information session meetings about the community standards process to provide all students, regardless of their background, equal opportunity to understand their rights and their opportunities to engage in the process.
- The Access Center supports students with disabilities and greatly impacts their success and experience at WSU. The accommodations managed and supported by the Access Center greatly assist students with disabilities in achieving equal access in their classrooms, and if they live on-campus, within their home. Without these accommodations, most of the students supported would not be able to persist to graduation. The Access Center presents various faculty workshops, including creating accessible presentations, designing accessible syllabi, accessibility as inclusivity, and creating accessible classroom environments. Access Center coordinated a Disability Symposium to highlight and promote an inclusive environment and community. The Access Center and LGBTQ+ Center participated in the C&E Certificate program where staff presented Disability Allyship & LGBTQ+ Allyship workshops for larger WSU system community. The Access Center hosted Students with Accommodations: Semester Start Up Orientation during Welcome of Week; for incoming students to learn about AC and how to maximize their experience. The Access Center developed and presented faculty notification letters workshop for faculty to learn about accommodations, rights and responsibilities, and how to support AC students. The Access Center presented and held a panel during Veterans and Military Affiliated Student (VMAS) Symposium that was held systemwide to support VMAS students with disabilities. The newly opened Disabled Student Center creates a community space based on their unique needs.
- Campus Climate and Community Building (CCCB) hosted the Diversity, Equity, Inclusion, and Justice (DEIJ) Summits, which occur each semester with a focus area within DEIJ. The CCCB Director is the chair of the Community Equity Response Team, which supports campus climate through proactive and reactive responses to divisive incidents on-campus, in the community, and across the world.

- The Office of Multicultural Student Services (MSS) seeks to facilitate the best undergraduate experience for multicultural, first generation, and other underrepresented students through the provision of culturally relevant services to enhance their learning and development and foster their successful transition, adjustment, persistence, achievement, and graduation. The MSS team composes emails to aid the Office of Admissions in its outreach to admitted, but not confirmed, students from African American, Asian Pacific American, Undocumented, and Chicanx/Latinx communities. As an active partner in Experience WSU events for admitted students, MSS shares information about some of the direct support WSU provides in culturally sustaining ways. MSS also works closely with the New Student Experience team to provide programming focused on family presentations and La Bienvenida Spanish-English presentations during New Coug Orientation. The La Bienvenida New Coug Orientation (NCO) took place in May 2023 which is a Spanish-English program that caters to students coming from predominantly Spanish-speaking households.
- Counseling and Psychological Services (CAPS) implemented a standard, minimum qualification for all clinical positions: "Experience and commitment to providing services to diverse student populations including, but not limited to, BIPOC students, LGBTQ+ students, undocumented, migrant, and immigrant students, international students, and veterans." CAPS requires a multicultural specialist to have "demonstrated experience working with students from marginalized communities, in clinical work and in outreach/other programming." Several clinicians at CAPS serve as liaisons to campus partners to be a primary contact, provide consultation, and hear about ways that CAPS can better serve those specific populations. CAPS hosts four diversity trainings each year for all clinical staff (graduate student counselors, interns, and senior clinical staff). Clinical staff select the topics for each semester, and the presentations include elements such as historical information, current research findings, self-reflection exercises, group discussion, narratives from marginalized individuals, and recommendations for clinical interventions and social justice actions. Recent topics have included: Model Minority Narratives among Asian/Asian-American Populations, Working with Trans and Gender Diverse Clients, and Using Contextual Behavior Therapy with Sexual and Gender Minorities. CAPS also hosts Diversity Dialogues (two per semester) for interns and senior clinical staff. Recent Diversity Dialogue topics have included: Aspects of white supremacy culture that show up in organizations and how to work on dismantling those aspects, Decolonization, including decolonizing therapy, and Neurodiversity and ways of becoming more neuro-inclusive. CAPS has a multicultural specialist clinician who works closely with a variety of campus partners to help students of color and students from other underserved or marginalized groups learn about counseling services and ways to have good mental health, which helps with student success and retention. In April 2023 we began recruiting for a second multicultural specialist.
- Cougar Health Services has a DEI committee dedicated to DEI work in healthcare on the Pullman campus.
- The Office for Access & Opportunity (A&O) actively engages in providing critical support services to leverage the educational benefits and academic success of students in our comprehensive support programs. Rooted in WSU's institutional mission and included in the university's strategic plan, true to this commitment, A&O's holistic strength-based approach supports an array of activities with multiple touchpoints impacting the student experience (e.g., advising, personal and career development, financial literacy, tutoring, mentoring etc.). These efforts help grow a more inclusive and eventually empowered workforce by gradually narrowing the gap that many underrepresented students experience on their journey to attain a bachelor's degree. Activities, services, and training are rooted in addressing inequities in higher education that foster diversity, equity, and inclusion at WSU. Collectively our student success strategies are based on the need to support student belonging and persistence. The Office for Access & Opportunity (A&O) ensure equitable access to and participation in the program for staff and students who may experience

barriers based on race, color, national origin, age, gender, or disability. The retention and graduation success of students is substantially dependent upon the selection of key personnel. Under the auspices of Student Affairs, all key personnel working in any capacity with the Office for Access & Opportunity must have demonstrated experience, qualifications, and cultural competencies working with the needs of low-income, first-generation, and otherwise underrepresented students. Staff accomplishes this goal through affirmative action/equal opportunity hiring practices, systematic evaluation, a grievance process, and ADA provisions. A&O programs conduct a national and regional search to hire and retain individuals who have overcome barriers similar to those confronting our target population. The plan to accomplish this includes dissemination of information on positions to related agencies; utilizing standard job applications and processes; and screening committees that are diverse and required to participate in an Implicit Bias Test (IBT). Screening applicant's awareness and understanding of social, economic, and cultural factors and those that have prior experience in working with the target population will be prioritized. A&O programs actively try to recruit a diverse staff through specific outreach efforts by utilizing numerous regionally based organizations and media announcements such as WA State Employment Services, Tribal Agencies, regional newspapers, TRIO listservs; HEP/CAMOP listservs, HIgherEdJobs.com, LinkedIn, and Scholarhires.com, along with state two and four-year colleges. Applicants are rated on the following through the interview process: Awareness of social, economic, and cultural factors that impact program participants, sensitivity to and awareness of the unique problems faced by participants, experience and/or ability to relate to students from economically and educationally disadvantaged backgrounds, demonstrated cross-cultural competencies.

- The High School Equivalency Program (HEP) helps agricultural workers and their children overcome tremendous barriers to obtain their high school equivalency degree and/or pursue higher education. HEP helps migrant and seasonal farmworkers and immediate family members obtain a general education diploma (GED) that meets the guidelines for high school equivalency. It is one of the few residential HEP programs in the nation. Instruction is offered in English and Spanish as many participants come from Spanish-speaking households. This HEP residential program serves 40 participants at WSU each year.
- WSU's TRIO Upward Bound programs serves approximately 55 to 60 high school students in partnership with selected high schools in rural Washington. WSU hosts eight pre-college Upward Bound programs serving low-income and potentially first-generation college students, largely in remote rural school districts where the need for interventions is greatest.
- The Team Mentoring Program (TMP) serves students underrepresented in Science, Technology, Engineering, Mathematics, and Pre-Health. Primarily supported by philanthropic dollars, TMP is a network that provides Mentees with a welcoming environment while guiding them to connect with their colleges, departments, and other services across WSU. TMP scholars participate in leadership, academic, and career building experiences by providing access to student and faculty mentors, scholarships, fieldtrips, and social/cultural activities. TMP helps WSU lead in practices that are inclusive, supportive, culturally responsive, and transformative for its diverse group of students.
- The College Assistance Migrant Program (CAMP) serves as a model retention program that seeks to provide outreach, academic support, and financial assistance to effectively transition students from migrant and seasonal farmworker backgrounds to complete the first academic college year and to continue in postsecondary education.
- TRIO Student Support Services (SSS) helps low-income and first-generation students to enroll and remain in college and is designed to provide comprehensive academic support on a one-to-one basis focusing on a student's personal, academic, and social success. SSS Participants receive academic advising, financial literacy, college success workshops, degree and career guidance, free tutoring, mentoring, study skills training, cultural enrichment activities, scholarship.

- University Recreation (UREC) follows the Student Affairs values for inclusion through facilitation of a safe and welcoming atmosphere in its facilities, programs, and services. UREC offers hundreds of hours per week of services in a variety of formats from early in the morning until late in the evening every day of the week to provide maximum options to meet diverse interests and needs of the campus community and promotes an inclusive atmosphere with its "let's welcome everyone" advertisements throughout its spaces. UREC offers a lactation room, two meditation/prayer spaces with adjacent ablution rooms, and gender inclusive locker rooms and rest rooms. UREC publishes a Statement of Inclusion on our website, on which we offer our commitment to inclusion, request for feedback, policy on participation/locker room use according to gender identity and policy on gender inclusive attire. UREC's Justice, Equity, Diversity and Inclusion Committee provides staff training for 350 employees throughout the year to address UREC's student employment learning outcome of inclusion. Staff are asked to meet performance expectations related to providing a safe and welcoming environment and also to continue to learn about JEDI topics via annual training, staff in-services on topics such as implicit bias, inclusive language and providing options for varying abilities and experiences. Additionally, staff can opt into a paid opportunity offered by the Committee, the 10-Day Justice, Equity, Diversity & Inclusion Challenge.
- The Women*s Center plays a pivotal role in fostering gender equity, empowerment, and inclusivity on campus. Through advocacy, education, and support services, the center actively contributes to creating a campus environment that values and uplifts the diverse experiences and perspectives of women, promoting a culture of respect, equality, and equity for all.
- Student affairs hosts, sponsors, and supports a wealth of cultural and awareness purposed events, including Take Back the Night, the Pah-Loots-Puu Powwow, the Round Dance, Culture Not Costume, the Black Excellence Awards, programs in recognition of Asian Pacific American Heritage Month, Mi Raza Gracias, the Asian American and Pacific Islander Toast, the Clothesline Project, Building Brides: Connecting Cultures, Royals, and Cinco de Mayo events.

Carson College of Business (Carson College)

- Carson College created a DEI Council consisting of two associate deans for equity and inclusion, focused on inclusive pedagogy and faculty development, and the manager of Carson College DEI initiatives. The council conducted a faculty survey to determine ways to improve inclusion.
- The Carson College EDGE program provides scholarships and programming to support recruitment and retention of first-generation students, many of whom are people of color and/or from low-income backgrounds.
- Scholarships from Fire & Vine are targeted towards underrepresented students.
- Two programs in development in the Tri-Cities aim to provide opportunities for students from underrepresented groups. The first is Career Connect Washington, a grant proposal to develop paid internship opportunities and full-time jobs tied to students' majors. The second is the Department of Energy Inclusive Energy Innovation, which supports mentoring students to start clean energy businesses in the area, with an emphasis on underrepresented groups.
- Carson College hosts Women in Finance, Entrepreneurship and MIS, an annual symposium featuring discussions between women who work in industries in which they are typically underrepresented.
- As part of Carson College's collaboration with Allen Sutton, executive director for equity and inclusive excellence, all students in the Career Amplifier Program earn an equity and inclusion badge after demonstrating awareness, attitude, knowledge, and skill required to equitably engage and include people from different local and global cultures.

- Carson College's WSU Vancouver faculty participate in the campus's Building a Community of Equity workshops.
- Carson College holds a group membership in Women in Business Education and participates in monthly convenings and workshops on a wide range of topics.
- Carson College holds an annual Military All Call program for its military-affiliated students, aiding their networking and professional development.
- The Carson College of Business Mentorship Program recruits and retains individuals from diverse backgrounds, including women, people of color, individuals with disabilities, and veterans, pairing students with mentors with whom they meet once or twice a month to discuss learning objectives related to professional development and academic success.

Libraries, WSU Pullman

- The Libraries post job openings on specific listservs and publications in outreach to underrepresented groups.
- The Libraries' EDI Outreach Committee created a display policies checklist to advertise Libraries' display options to EDI groups to promote diverse voices throughout its spaces.
- The EDI Collections Committee continued educating library faculty on diversifying the print and electronic collections.

College of Agricultural, Human, and Natural Resource Sciences (CAHNRS)

- CAHNRS continues to implement DEI trainings for search committees. Lisa Guerrero, provost for inclusive excellence, facilitated a workshop entitled Intentional Inclusion: Minimizing Unconscious Bias and Microaggressions.
- CAHNRS requires a diversity statement as part of the application packet for faculty and leadership appointments and includes DEI questions for other applicants. CAHNRS advertises job postings with gender inclusive language and markets them on sites and in publications known for attracting diverse pools of talent.
- CAHNRS implemented a series of DEI professional trainings for chairs and directors and for faculty and staff, including a presentation by Michael Heim, director of migrant education, student access, and support, on how to increase enrollment, retention, and graduation of Latinx/Latine students. In collaboration with Allen Sutton, executive director for equity and inclusive excellence, CAHNRS created and implemented CAHNRS Intentional Diversity and Excellence in Advising, a training that engaged all CAHNRS academic advisors on how to best serve students of color.
- CAHNRS's DEI Committee, composed of faculty, staff, and graduate students, is complemented by DEI committees within individual units and departments. At the end of Fall 2023, the CAHNRS DEI Committee created four working groups: Access, Success, and Equity; Employee Access, Success, and Equity; Campus Climate and Intergroup Relations; and Education, Scholarship and Service. The DEI Committee had its first DEI Retreat in March 2023, an opportunity to plan and implement DEI strategies and put forward DEI policies and practices for 2024.
- CAHNRS completed its DEI website, which includes its CAHNRS for All logo, an inclusive symbol marking the college as a welcoming place where faculty, staff, and students may feel safe, validated, and supported. The website posts important DEI information, such as funding opportunities, a calendar of events, a diversity-focused and religious calendar, CAHNRS all-around DEI news, and culturally competent videos celebrating and honoring CAHNRS Extension events and other DEI projects. The website will soon be available in Spanish.
- CAHNRS developed and implemented a system to reward DEI accountability, the CAHNRS for All

Ribbon System. All CAHNRS units and departments adhere to a set of DEI criteria posted on the DEI website, allowing them to earn different colors of ribbons depending on how much time, effort, and resources they allocate to DEI practices and initiatives.

- In the 2023-2024 academic year, CAHNRS awarded two DEI mini grants, open to faculty, staff, and students, to develop and implement DEI strategies, events, and projects that impact CAHNRS, WSU, and local communities. One of the mini grants supported WSU's Graduate Women of Color Alliance, facilitating a speaker series to highlight the challenges women of color face in academia. CAHNRS awarded the other mini grant to the Department of Human Development, which supported recruit of a more diverse student body. CAHNRS also created a fund for out-of-cycle applications to support DEI projects, such as invited speakers and conference and symposium registration and attendance funding.
- CAHNRS awarded four DEI Leadership Awards for faculty, staff, and students, recognizing, validating, and crediting the DEI work of the CAHNRS community.
- CAHNRS created new partnerships with the forestry industry and received donations for its DEI funds. These new collaborations may increase the number of scholarships and paid internships for students from minoritized groups while creating a strong collaboration between industry and DEI processes in higher education. CAHNRS DEI is looking into partnering with JUNTOS to involve industry in educating high school students and preparing them for higher education.
- CAHNRS for All hosts a biweekly open meeting with Luz María Gordillo, assistant dean for diversity, equity, and inclusive excellence.
- CAHNRS for All honors and celebrates heritage months by promoting and participating in professional workshops and celebratory events that promote cultural competency. Once a month, CAHNRS offers CAHNRS for All Get Togethers, providing space for Black, Indigenous, and other People of Color and LGBTQIA+ groups to create social networks and share experiences; all of CAHNRS is welcome to participate.

College of Arts and Sciences (CAS)

- In 2023, CAS hired an associate dean of equity and outreach (ADEO). The ADEO acts as a key advisor and partner with the dean and other associate deans to collaborate around issues of IDEA related to faculty, staff, and student recruitment and retention, support, and development. The to support the recruitment, support and retention of faculty, staff, and students from underrepresented backgrounds, the ADEO held listening sessions with newly hired faculty to identify institutional barriers and potential avenues for success, developed and facilitated communities of practice for faculty teaching equity and justice courses, and launched an CAS initiative to increase the use of the WSU Equity Lens Toolkit for policy review and decision making.
- The dean charged a working group of faculty and staff with designing WSU's first college-level mental health strategy. He also directed a Faculty Advisory Council to study ways to increase the use of wellbeing programs for faculty and staff. CAS has committed to distributing information on resources more regularly and effectively and addressing work and life challenges.
- The associate dean for faculty revamped CAS search committee training and developed a bank of questions to provides a more nuanced assessment of inclusive pedagogy. Both the associate dean and ADEO review interview questions submitted by search committees to ensure that questions regarding inclusive pedagogy are asked during the interview process.
- Academic Director and Associate Dean Pavithra Narayanan partnered with Vice Chancellor Christopher and Pullman appointing authorities to increase the number of faculty and staff of color in Vancouver, hiring two classified staff, one administrative professional, and five faculty.
- Worked with Vice Chancellor Christopher to support professional development of faculty of color by nominating them for the provost leadership academy.

- CAS collaborated with School of Environment Director Allyson King to support Assistant Professor Deepti Singh's attendance at the 2023 Society for Advancement of Chicanos and Native Americans in Science conference.
- The associate dean for research and graduate studies and the School of Biological Sciences developed a graduate student peer mentoring program; the associate dean plans to work with other departments to adopt the program next year. Along with being a basic peer mentorship program, the programs goals are to help students develop community, uncover hidden curriculum, and more. Students are able to self-select mentors from volunteers so they can find peer mentors that understand them, their backgrounds, and their experiences.

College of Nursing

- The college has many community events in partnership with other WSU colleges and external stakeholders, including Exploring Culturally Safe Dialogues and Navigating with Humility, Public Policy and Health in the USA: Affirmative Action and Racial Health Justice, Communication and Cultural Lenses, and Working with LGBTQ+ Communities.
- The college posts rotating digital signage highlighting Black nurses in history.
- The college's DEI recognition and advocacy program accepted 11 DEI advocates.

WSU Vancouver (WSUV)

- The Office of Equity and Diversity and WSUV HRS developed a working group to assess equity practices in recruitment and retention of employees in conjunction with this strategy in Goal 4 of the WSUV strategic plan. Working group members include Obie Ford III, vice chancellor for equity, diversity, and inclusion; Julia Getchell, director of human resources; Shameem Rakha, campus director of faculty equity and belonging; and Rocio Sotomayor, chair of the Council on Equity, Diversity, and Inclusion (CEDI). Goal 4 focuses on promoting an ethical and socially just society through an intentional commitment to equity, diversity, inclusion and belonging. It includes an objective to ensure equitable recruitment, retention and promotion of employees across demographic groups, including increasing representation from underrepresented communities. WSU Vancouver has adopted the Equity Impact Assessment Tool into the campus fabric to further infuse equity and belonging in policies, decisions, practices, processes, and people. This tool is also part of WSU Vancouver's strategic plan.
- The Office of Equity and Diversity has increased employee resource and affinity groups on campus to support faculty and staff from historically underrepresented and excluded groups. Groups include Support and Empowerment for Employees of Color Association, Space for Us – Black Staff and Faculty Association, Prism – LGBTQ+ Staff and Faculty 25 Association, Faculty of Color Resource Group, and a newly formed Latino/a/e/x Employee Association.
- The office of Equity and Diversity developed the Resource Guide of Sample Goals for Equity, Diversity, Inclusion and Belonging. This is another resource that informs the strategy to add an equity and inclusion requirement to the annual review process for leadership and management.
- WSUV has a host of councils that actively lead efforts for equity, inclusion and belonging, such as the Accessibility Council, Collective for Social and Environmental Justice, and CEDI. CEDI held the 2024 Town Hall: Conversations for Collective Progress, an event focused on collective action toward equity and inclusion through uplifting campus and community resources for students, staff, and faculty.
- WSUV HRS developed a New Employee Orientation for all WSUV employees who have been in their roles a year or less. The program allows new employees to connect with campus leadership, including the chancellor and the chancellor's leadership team. The program also builds

community and sense of belonging for participants.

- WSUV HRS developed a one-page resource on tips to embed equity in staff searches, including strategies to prepare, advertise/outreach, screen/interview, and hire/onboard. WSUV is also a member of culturally specific organizations in advertising efforts, including Partners in Diversity. WSUV HRS developed an Advertising and Outreach Plans and Resources document to further ensure that searches for staff and faculty are infusing strategies to recruit talent from a diversity of backgrounds and historically underrepresented communities.
- The Building a Community of Equity Program (BaCE) provided a wealth of workshops throughout the year, including Embedding Equity in the Search for Staff; Supporting Pronouns in the Classroom, Workplace, and Everyplace; and Recognizing and Responding to Microaggressions. The BaCE program also hired a new campus director, Elisha Hardekopf, welcomed the fourth cohort of the BaCE Pedagogy Academy, and held its second annual spring showcase. The event showcased the efforts of current academy cohort members who presented on how they applied equity-minded tools and culturally responsive resources from the academy into their courses to impact student success, belonging, and retention.
- Julian Ankney transitioned from coordinator of Native American programs to campus director of Native programs position and leads strategies for recruitment and retention of talent from Tribal and Native American communities. This position is currently located in the Office of Equity and Diversity.
- WSUV faculty and staff lead a series of workshops and events for first generation students called First Gen Collective; the events include financial literacy, Blazers games, and alumni guest speakers over dinner.
- The Center for Intercultural Learning and Affirmation offers tutoring and mentoring, a retreat featuring financial and time management and imposter syndrome discussions, and over 20 events each semester, such as Trans Day of Remembrance, First Friday lunches, guest speakers, and a hip hop series.
- WSUV provides supplemental instruction for struggling students, programming for first-year students to develop community, provides its Lookbook pamphlets in Spanish and Russian, hosted the 2023 Latino Youth Leadership conference for Latino k-12 students, and hosts La Bienvenida, an orientation program for Spanish-speaking families.

Presidential Committees

- The WSU Office of the President appoints members to presidential committees in furtherance of ensuring an inclusive employment and academic environment, including the Commission on the Status of Women, the Gender Identity & Sexual Orientation Committee, and the WSU Title IX Committee.

CHAPTER 10: INTERNAL AUDIT AND REPORTING
41 C.F.R. § 60-2.17(d)

Inherent in the EORR Plan is the need for periodic self-assessment of problems encountered, corrective action taken, and progress made. Self-evaluation requires complex record keeping systems on applicants, employees, and components of the EORR Plan itself. Periodic reports from supervisors, department managers, the CHRO, the Director of CCR, and other relevant persons are required.

The objective of all record keeping systems to be implemented is to assess the results of past actions, trends, the appropriateness of goals and objectives, the appropriateness and relevancy of identified solutions to problems, and the adequacy of the EORR Plan as a whole. In addition, a further objective is to identify the proper corrective actions to be made to all components.

In order to fully achieve the objectives of such a record keeping system, the results of it must lead to follow-up through feedback to managers, supervisors, and staff, through reallocation of resources, through modifications to plans and the record keeping system itself, through appropriate recognition of personal achievements as well as punitive actions for discriminatory acts. For any identified deficiencies, appropriate corrective action will be identified and implemented.

The records that are maintained are the basis for updating the EORR Plan, including revising the availability data and establishing annual numerical goals. The internal audit and reporting system is used as the basis for evaluating systemic, results-oriented programs and affirmative action efforts.

The WSU auditing and reporting system periodically measures the effectiveness of its total EORR program. WSU ensures that the following are completed periodically, as appropriate, advising and consulting with various WSU administrators and departments as needed:

1. Periodically reviewing personnel processes, including records related to placements, transfers, promotions, terminations, and compensation;

2. Upon receipt of discrimination concerns related to placements, transfers, promotions, terminations, and compensation, reviewing personnel activity and engage in investigation or resolution, as appropriate;

3. Providing training and guidance to supervisors and managers where data indicates that equal employment opportunity goals and organizational objectives are not sufficiently being met;

4. Developing internal reports describing discrimination grievances and responses, to better understand climate and ensure all factors impacting diversity recruitment and retention can be appropriately addressed;

5. Reviewing report results with all levels of management as appropriate; and

6. Advising top management of program effectiveness and submitting recommendations to improve unsatisfactory performance.

Washington State University

All WSU Locations

PART II: EORR PLAN FOR PROTECTED VETERANS AND INDIVIDUALS WITH DISABILITIES

FOR

January 1, 2024 - December 31, 2024

PART II

EORR PLAN FOR PROTECTED VETERANS AND INDIVIDUALS WITH DISABILITIES

CHAPTER A: POLICY STATEMENT
41 C.F.R §§ 60-300.44(a); 60-741.44(a)

CHAPTER B: REVIEW OF PERSONNEL PROCESSES
41 C.F.R §§ 60-300.44(b); 60-741.44(b)

CHAPGER C: PHYSICAL AND MENTAL QUALIFICATIONS 41 C.F.R §§ 60-300.44(c); 60-741.44(c)

CHAPTER D: REASONABLE ACCOMMODATION TO PHYSICAL AND MENTAL LIMITATIONS
41 C.F.R §§ 60-300.44(d); 60-741.44(d)

CHAPTER E: HARASSMENT
41 C.F.R §§ 60-300.44(e); 60-741.44(e)

CHAPTER F: EXTERNAL DISSEMINATION OF POLICY, OUTREACH AND POSITIVE RECRUITMENT
41 C.F.R §§ 60-300.44(f); 60-741.44(f)

CHAPTER G: INTERNAL DISSEMINATION OF POLICY 41 C.F.R §§ 60-300.44(g); 60-741.44(g)

CHAPTER H: AUDIT AND REPORTING SYSTEM
41 C.F.R §§ 60-300.44(h); 60-741.44(h)

CHAPTER I: RESPONSIBILITY FOR IMPLEMENTATION 41 C.F.R §§ 60-300.44(i); 60-741.44(i)

CHAPTER J: TRAINING
41 C.F.R §§ 60-300.44(j); 60-741.44(j)

CHAPTER K: DATA COLLECTION ANALYSIS
41 C.F.R §§ 60-300.44(k); 60-741.44(k)

CHAPTER L: COMPENSATION
41 C.F.R §§ 60-300.21(i); 60-741.21(i)

CHAPTER A: POLICY STATEMENT
41 C.F.R. §§ 60-300.44(a); 60-741.44(a)

WSU provides equal employment opportunity in the employment and advancement for all persons, regardless of status as a protected veteran and/or individual with a disability at all levels of employment, including the executive level.

WSU does not and will not discriminate against any applicant or employee regardless of status as a protected veteran and/or individual with a disability to any position for which the applicant or employee is qualified.

In addition, WSU is committed to a policy of taking affirmative action to employ and advance in employment qualified protected veteran employees and qualified employees with disabilities at all levels, including the executive level. Such affirmative action shall apply to all employment practices, including, but not limited to hiring, upgrading, demotion or transfer, recruitment, recruitment advertising, layoff or termination, rates of pay or other forms of compensation, and selection for training, including apprenticeship and on-the-job training.

Decisions related to personnel policies and practices shall be made on the basis of an individual's capacity to perform a particular job and the feasibility of any necessary job accommodation. WSU will make every effort to provide reasonable accommodations to any physical and mental limitations of individuals with disabilities and to disabled veterans.

Employees and applicants shall not be subjected to harassment, intimidation, threats, coercion or discrimination because they have engaged in or may engage in any activity protected by state, federal or local anti-discrimination laws including 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 the affirmative action provisions of the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended (VEVRAA) or any other Federal, state or local law requiring equal opportunity for disabled veterans, recently separated veterans, active wartime or campaign badge veterans, or Armed Forces service medal veterans or Section 503 of the Rehabilitation Act of 1973, as amended (Section 503) or any other federal, state or local law requiring equal opportunity for disabled persons;;

(3) Opposing any act or practice made unlawful by VEVRAA or its implementing regulations or any other federal, state or local law requiring equal opportunity for disabled veterans, recently separated veterans, active wartime or campaign badge veterans, or Armed Forces service medal veterans or section 503 or its implementing regulations or any other federal, state or local law requiring equal opportunity for disabled persons; or

(4) Exercising any other right protected by VEVRAA or Section 503 or their implementing regulations.

Our obligations in this area stems from not only adherence to various state and federal regulations, but also from our commitment as an employer in this community to provide job opportunities to all persons, regardless of race, sex/gender, sexual orientation, gender identity/expression, religion, age, color, creed, national or ethnic origin, physical, mental or sensory disability, including disability requiring the use of a trained service animal, marital status, genetic information, status as an honorably discharged veteran or member of the military, and/or immigration or citizenship status, except as authorized by federal or state law, regulation, or government contract. WSU's EEO policy and affirmative action obligations include the full support from the WSU Board of Regents.

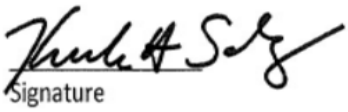
WSU will also continually design and implement audit and reporting systems that will measure the effectiveness and the compliance of the EORR Plan, identify the need for remedial actions, maintain up-to- date and research driven retention and recruitment strategies, determine if objectives were attained, and determine if opportunities to participate in university-sponsored activities were extended to all employees and applicants.

WSU is also committed to abiding with the Pay Transparency Nondiscrimination Provisions and therefore, will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. WSU employees who have access to the compensation information of other employees or applicants as part of their essential job functions are informed and trained to not disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) a response to a formal complaint or charge; (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with WSU's legal duty to furnish the information.

If you have any questions regarding our equal employment opportunity, harassment policies or the complaint procedure, you may contact WSU Compliance and Civil Rights (CCR) or your HRS consultant. Parts of the EORR Plan may be reviewed, as appropriate, by making an appointment with CCR.

See also:

- WSU Executive Policy 12 – Equal Employment Opportunity Policy
- WSU Executive Policy 15 – Policy Prohibiting Discrimination and Harassment


Signature

Dr. Kirk Schulz
WSU President

Date:
5/7/2024

CHAPTER B: REVIEW OF PERSONNEL PROCESSES
41 C.F.R. §§ 60-300.44(b); 60-741.44(b)

To ensure that all personnel activities are conducted in a job-related manner which provides and promotes equal employment opportunity for all known protected veterans and employees and applicants with disabilities, reviews are periodically made of WSU's examination and selection methods to identify barriers to employment, training, and promotion.

1) WSU periodically conducts a review of its employment processes to ensure thorough and systematic consideration of the job qualifications of a) known protected veteran applicants and employees; and b) applicants and employees with disabilities for job vacancies filled either by external hiring or internal promotions/transfers, as well as for all training opportunities available. In order to determine whether an individual is qualified for a particular job, a close examination of the content of the job is made, as well as a review of the job qualifications of known protected veterans and individuals with disabilities, both applicants and employees. In determining the qualifications of a protected veteran, consideration is given only to that portion of the military record, including discharge papers, relevant to the job qualifications for which the veteran is being considered.

2) WSU ensures that its personnel processes do not stereotype individuals with disabilities or protected veterans in a manner which limits their access to jobs for which they are qualified.

3) WSU ensures that applicants and employees with disabilities have equal access to its personnel processes, including those implemented through information and communication technologies.

4) WSU provides reasonable accommodations to applicants and employees with disabilities to ensure that equal employment opportunity are extended in the operation of its personnel processes.

5) WSU has adopted an Electronic and Information Technology (EIT) Accessibility Policy, Executive Policy 7, that ensures that the accessibility of legacy EIT is assessed and that future development or procurement of EIT meets accessibility standards.

6) WSU designates an ADA Coordinator to provide technical guidance and support for employment processes, as needed.

CHAPTER C: PHYSICAL AND MENTAL QUALIFICATIONS
41 C.F.R. §§ 60-300.44(c); 60-741.44(c)

To ensure that all physical and mental qualifications and requirements are job-related and promote equal employment opportunity for all known protected veterans and employees and applicants with qualified disabilities, reviews are periodically made of WSU's physical and mental qualifications and requirements as they relate to employment, training, and promotion.

WSU's physical and mental job requirements are reviewed to determine whether or not they are job-related and consistent with business necessity and safe performance on the job.

Schedule for Review: Any previously reviewed classification will be reviewed again if there is a change in working conditions which affects the job's physical or mental requirements (e.g., new requirements, new equipment, etc.)

CHAPTER D: REASONABLE ACCOMMODATION TO PHYSICAL AND MENTAL LIMITATIONS
41 C.F.R §§ 60-300.44(d); 60-741.44(d)

WSU will make every effort to provide reasonable accommodations to physical and mental limitations of applicants and employees with disabilities or who are disabled veterans unless it can demonstrate that the accommodations would impose an undue hardship on the operation of business. Such reasonable accommodations are implemented in WSU's electronic and/or online application systems. WSU ensures that qualified applicants and employees with disabilities, who are unable to fully utilize the system, are provided equal opportunities to apply and be considered for all jobs. WSU will confidentially review performance issues of employees with known disabilities to determine whether a reasonable accommodation is needed when: 1) the employee is having significant difficulty with job performance, and 2) it is reasonable to conclude that the problem is related to the known disability.

Employees may also contact the following at any time to request reasonable accommodations:

WSU Human Resource Services
Disability Services
hrs.disabilityservices@wsu.edu
509-335-4521

CHAPTER E: HARASSMENT
41 C.F.R §§ 60-300.44(e); 60-741.44(e)

WSU has developed and implemented a set of procedures to ensure that its employees with disabilities and protected veterans are not harassed due to those conditions. A copy of Executive Policy 15, the WSU Policy Prohibiting Discrimination and Harassment, prohibits harassment of individuals with disabilities and protected veterans, is made available for distribution to new and existing employees.

WSU requires all employees to undergo Employee Rights & Responsibilities Under Executive Policy #15 training within six months of hire and annually thereafter. Supervisors, Chairs, and Directors also receive additional training.

CHAPTER F: EXTERNAL DISSEMINATION OF POLICY, OUTREACH AND POSITIVE RECRUITMENT
41 C.F.R. §§ 60-300.44(f); 60-741.44(f)

Based upon WSU's review of its personnel policies as described in Chapter B, the following activities will be implemented or continued to further enhance our affirmative action efforts. All activities are the responsibility of the Chief Human Resource Officer and managers and supervisors.

1) Initiate and maintain communication with organizations having special interests in the recruitment of and job accommodations for protected veterans and individuals with disabilities.
2) Ensure images are inclusive of workers with disabilities in consumer, promotional, or help wanted advertising.
3) Disseminate information concerning employment opportunities to radio and television stations, and to publications that primarily reach protected veterans and individuals with disabilities.
4) Provide information emphasizing job opportunities for protected veterans and individuals with disabilities to all local educational institutions, public and private.
5) Inform all recruiting sources, in writing and orally, of the Company's affirmative action policy for protected veterans and individuals with disabilities.
6) List all suitable job openings with the State Employment Development Department, with exemptions for executive and top management positions, positions that will be filled from with the WSU organization, and positions lasting three days or fewer. This is an on-going activity. A listing of job opportunities reported to the local State Employment Service Delivery System is always kept current.
7) Notify all subcontractors, vendors, and suppliers that WSU is an Affirmative Action and Equal Employment Opportunity employer. This includes their obligation to annually file their EEO Reporting form and VETS 4212 form and, for employers with 50 or more employees and contracts of $50,000 or more, their obligation to develop a written affirmative action plan.
8) Conduct formal briefing sessions with representatives from recruiting sources. Include as part of the briefing sessions, facility tours, clear and concise explanations of current and future job openings, position descriptions, worker specifications, explanations of the University's selection process, and recruiting literature. Arrange for referral of applicants, follow up with sources, and feedback on disposition of applicants.
9) Participate in veterans job fairs and work study programs with Veterans' Administration rehabilitation facilities and schools which specialize in training or educating protected veterans.
10) WSU will also grant leaves of absence to employees who participate in honor guards for the funeral of veterans.

CHAPTER G: INTERNAL DISSEMINATION OF POLICY
41 C.F.R. §§ 60-300.44(g); 60-741.44(g)

In order to gain positive support and understanding for the affirmative action program for protected veterans and individuals with disabilities WSU will implement or continue to implement the following internal dissemination procedures. The following communication priorities are designed to foster support and understanding from WSU's executive staff, management, supervisors, and other employees, in an effort to encourage all employees to take the necessary actions to aid WSU in meeting its obligations.

1) Provide support, as needed, to working groups identifying best practices for employee retention.

2) Provide technical guidance to university departments regarding the recruitment of protected veterans and individuals with disabilities.

3) Include the policy in WSU's policy manual and other in-house publications.

4) Conduct special meetings with executive, management, and supervisory personnel to explain the intent of the policy and individual responsibility for effective implementation, making clear the President's support and emphasis for the policy.

5) Provide training sessions for all employees involved in recruiting, selection, promotion, and other related employment issues for protected veterans and individuals with disabilities, including training about implicit bias.

6) Provide departments with utilization goals and training on interpretation and best practices to ensure equal employment opportunities.

7) Inform union officials of the contractor's policy and request their cooperation.

8) Include non-discrimination clauses in all union agreements and review all contractual provisions to ensure they are non-discriminatory.

9) Post the policy on WSU bulletin boards, along with information about Executive Policy 15, which includes protection from discrimination and harassment on the basis of disability and protected veteran status.

10) When employees are featured in employee handbooks or similar publications for employees, include employees with disabilities.

CHAPTER H: AUDIT AND REPORTING SYSTEM
41 C.F.R. §§ 60-300.44(h); 60-741.44(h)

WSU has developed and currently implements an audit and reporting system that addresses the following:

1) Measures the effectiveness of WSU's overall affirmative action program and whether the company is in compliance with specific obligations.

2) Indicates the need for remedial action.

3) Measures the degree to which WSU's objectives are being met.

4) Whether there are any undue hurdles for individuals with disabilities and protected veterans regarding company sponsored educational, training, recreational, and social activities. This will also include, but not limited, to the review of the on-line and electronic application system to determine their accessibility and ensuring that procedures for how to request reasonable accommodations are prominently displayed and that individuals with disabilities can readily obtain the needed accommodation.

CHAPTER I: RESPONSIBILITY FOR IMPLEMENTATION
41 C.F.R. §§ 60-300.44(i); 60-741.44(i)

As part of its efforts to ensure equal employment opportunity to protected veterans and individuals with disabilities, WSU has designated specific responsibilities to various staff to ensure the EORR Plan focuses on all components of the employment system. To that end, the President, the Vice President and Chief Human Resource Officer (CHRO), the Director of Compliance and Civil Rights (CCR), and those employed as supervisors and managers have undertaken the responsibilities described below.

President

The President is responsible for providing top management support for WSU's EORR Plan. The President ensures that all employees and applicants know the commitment of Senior Management to EEO and affirmative action. Additional responsibilities include, but are not limited to:

1) Designating appropriate personnel with the responsibility for overseeing, administering, implementing, and monitoring WSU's EORR Plan. Ensuring that these personnel are identified in writing.

2) Ensuring that designated personnel responsible for all EORR Plan components are given the necessary authority and top management support and staffing to successfully implement their assigned responsibilities.

3) Imparting the personal direction that ensures total involvement and commitment to equal employment opportunity programs through WSU's EORR Plan.

Chief Human Resource Officer

The CHRO is responsible for overall supervision of the implementation of personnel processes and other human resources functions. The CHRO ensures, through department managers and supervisors, that all relevant policies and procedures under the purview of Human Resource Services (HRS) are adhered to. The CHRO's responsibilities include, but are not limited to, the following:

1) Maintaining system-wide management support and cooperation for WSU's EORR Plan.

2) Assisting line management in arriving at solutions to EEO problems.

3) Reviewing results of audit and reporting systems to assess the effectiveness of WSU's EEO programs and to direct corrective actions where necessary.

4) Providing guidance to managers and supervisors in taking proper action to prevent employees from being harassed in any way, through one-on-one contact, training, referrals to appropriate grievance processes, and disciplinary action.

5) Ensuring that relevant staff, (i.e., managers, and supervisors) are aware that their work

performance is being evaluated in part on the basis of their equal employment opportunity efforts.

6) Ensuring that transfer and promotion processes include a review of qualifications to ensure equitable opportunity, based on job-related employment practices.

7) In partnership with CCR, and relevant departments as appropriate, conducting periodic reviews of the effectiveness of the equal opportunity programs in: a) training programs and hiring and promotion patterns, b) facilities, and c) sponsored educational, training, recreational, and social activities.

8) Ensuring that WSU has appropriate liaisons to organizations and community action groups for protected veterans and individuals with disabilities, in addition to ensuring that representatives are involved in community service programs of local organizations for protected veterans and individuals with disabilities.

9) Reviewing, and assisting managers and supervisors in reviewing, staff job descriptions and specifications, as well as faculty notices of vacancy, to ensure they are free of discriminatory provisions and artificial barriers, that all requirements are job-related, that they are realistic, and that they reflect the actual work requirements of the essential job duties.

10) Ensuring that notice is periodically sent to all departmental human resource contacts of posters and policies required to be displayed. HRS also maintains a webpage that indicates the location of designated campus areas for required display of posters.

11) Ensuring that all open recruitments include the required (pre and post) offer invitation to self-identify for protected veterans and individuals with disabilities. All positions posted through the WSU Jobs website include the pre-offer invitation and all offer letters include an invitation to self-identify post-offer.

12) Conducing periodic salary reviews to aid equity and retention (*see* BPPM 60.12) and providing support to the Office of the Provost to monitor and approve faculty salaries.

Compliance and Civil Rights

CCR is responsible for ensuring that the directives of the President regarding WSU's EEO responsibilities are implemented. CCR's duties include, but are not limited to, ensuring the following:

1) Presenting recommendations and procedural changes to senior management concerning EEO and affirmative action and ensuring that senior management and the Associate Vice President & Chief Compliance and Risk Officer is kept informed of WSU's compliance status.

2) Providing technical guidance to WSU's employees, as necessary, to carry out all actions required to meet WSU's equal employment opportunity and affirmative action commitments.

3) Responsible for the design and effective implementation of the EORR Plan.

4) Ensuring that the EORR Plan is reviewed and updated annually.

5) Collaborating with Senior Management on EEO and EORR Plan issues.

6) Developing, implementing, and maintaining audit and reporting systems to measure effectiveness of equal employment opportunity programs, including those that will

    a. Indicate need for remedial action,

    b. Determine degree to which goals and objectives have been obtained.

7) Advising management in the modification and development of WSU's policies to ensure the enhancement of equal employment opportunity for all employees and potential employees within existing equal employment opportunity guidelines.

8) Identifying problem areas and working with the CHRO to establish strategies, goals and objectives to solve these problems.

9) Ensure that the required post-offer invitation to self-identify for protected veterans and individuals with disabilities is communicated appropriately. CCR sends a supplemental reminder to all new hires within one month of hire.

10) WSU maintains a schedule to ensure that employees are re-surveyed regarding their disability status every five (5) years and send out reminder to employees, at least once during the five (5) year intervals, that they may voluntarily update their disability status at any time. All employees were invited to participate in a re-survey effort in 2021.

11) Serving as the liaison between WSU and enforcement agencies.

12) Keeping management informed of the latest developments in the equal employment opportunity area.

13) Assisting in review and revision of all policies, procedures, and rules to ensure they are not in violation of federal or state laws and regulations relating to EEO/Affirmative Action.

14) Ensuring WSU's VETS 4212 form is filed annually with the Veterans' Employment and Training Service (VETS)

15) Responsible for monitoring WSU's overall compliance with the EORR Plan.

<u>Managers and Supervisors</u>

In their direct day-to-day contact with WSU's employees, managers and supervisors have assumed

certain responsibilities to help WSU ensure compliance with equal employment opportunity programs and effective implementation of the EORR Plan. These include, but are not limited to the following:

1. Adhering to WSU's equal employment opportunity policy.

    A. Supporting and assisting the CHRO and the Director of CCR in developing, maintaining, and successfully implementing the EORR Plan.

    B. Taking action to prevent discrimination and harassment of employees.

2. Encouraging employees to seek opportunities that might lead to greater personal growth and value and counseling them on paths for upward mobility within the employment structure.

3. Ensuring that all interviews, offers of employment and/or wage commitments are consistent with WSU policy.

4. Implementing the internal promotion and transfer of all employees under their supervision, consistent with EORR Plan goals and objectives.

5. Assisting in identifying problem areas and provide needed information for establishing and meeting department affirmative action goals and objectives.

6. Encouraging search committee members to utilize the recruitment training and toolkit provided by HRS.

CHAPTER J: TRAINING
41 C.F.R. §§ 60-300.44(j); 60-741.44(j)

WSU provides training that is available to all employees involved in any way with the recruitment, selection, promotion, disciplinary actions, training, and related processes of individuals with disabilities or protected veterans to ensure commitment to the company's stated affirmative action goals.

CHAPTER K: DATA COLLECTION ANALYSIS
41 C.F.R. §§ 60-300.44(k); 60-741.44(k)

WSU has adopted the current national percentage of veterans in the civilian labor force of 5.4% as its hiring benchmark for protected veterans. WSU will update its hiring benchmark as new data is published and updated via the OFCCP's website. The 5.4% hiring benchmark is applied to each job group within WSU.

WSU also adopted the current national utilization goal of 7.0% for qualified individuals with disabilities. WSU will update its utilization goal as new data becomes available, updated and published. The 7.0% utilization goal is applied to each job group within WSU.

Goals and/or benchmarks do not require that WSU hire, promote, train, and/or retain a specified number of individuals with disabilities and/or protected veterans. These goals/benchmarks are not rigid and inflexible quotas which must be met but are instead targets reasonably attainable by means of applying every good faith effort to make all aspects of the entire EORR Plan work. A goal is a guidepost against which WSU, a community group, or a compliance agency can measure progress in remedying identified deficiencies in WSU's workforce.

WSU has collected the required data and conducted studies to identify areas of opportunities in the employment of protected veterans and individuals with disabilities. WSU will continue to monitor and update these studies periodically during each EORR Plan year. In each case where the hiring benchmark for protected veterans and/or the utilization goal for individuals with disabilities are not met, affirmative action, as appropriate, will be taken consistent with the activities mentioned in Chapter F (External Dissemination of Policy and Outreach and Positive Recruitment) and measures described in Chapter H (Internal Audit and Reporting) of this EORR Plan.

See the ***Hiring Benchmark and Utilization Goals Analyses***.

CHAPTER L: COMPENSATION
41 C.F.R. §§ 60-300.21(i); 60-741.21(a)(9)

It is the policy of WSU that when offering employment or promotion to protected veterans or individuals with disabilities, the amount of compensation offered will not be reduced because of any disability income, pension, or other benefit the applicant or employee receives from another source.

WSU is also committed to abiding with the Pay Transparency Nondiscrimination Provision, 41 CFR 60-1.35. Employees or applicants who have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant will not be discharged or in any other manner be discriminated. Employees who have access to the compensation information of other employees or applicants as part of their essential job functions are informed and trained to not disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) a response to a formal complaint or charge; (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with WSU's legal duty to furnish the information.