

APPENDIX C

2. Availability Analyses

Data compiled for 1971 by the State Employment Security Commission, Research Bureau, show that (1) of the total U. S. civilian labor force of 76,811,000, approximately 38 percent was female; (2) of the total North Carolina civilian labor force of 2,313,700, approximately 41 percent was female; (3) the estimated unemployment rate for females in North Carolina was 5.6, or 53,520 persons; (4) for the adjacent counties of Orange, Durham, Alamance, and Chatham (which are most proximate to the Office of General Administration) of the total labor force approximately 43.5 percent was female; the aggregate average unemployment rate among females within the foregoing counties was 5.4 percent, or 3,400 persons.

Data compiled for 1971 by the State Employment Security Commission, Research Bureau, show that (1) of the total U. S. civilian labor force of 76,811,000, approximately 11.2 percent consisted of Non-Whites; (2) of the total North Carolina civilian labor force of 2,313,700, approximately 20 percent, or 457,760 persons, was Non-White; (3) the estimated unemployment rate for Non-Whites in North Carolina was approximately 7.3 percent, or 33,350 persons; (4) for the adjacent counties of Orange, Durham, Alamance and Chatham, of the total labor force approximately 23.4 percent was Non-White; the aggregate average unemployment rate among Non-Whites within the foregoing counties was 6.5 percent, or 2,280 persons.

The foregoing data obviously do not address the question of actual availability, at this location, of qualified persons for various categories of skilled employment. The difficulty of arriving at sound estimates of availability is a reflection of the diversity and number of salient factors which influence the generation of an estimate of this character. Determining the "availability of women" and the "availability of minorities" means, at the very least, the identification of (1) minimally qualified persons (by virtue of educational background and training, experience, and past indicia of successful performance), (2) who are either unemployed and seeking employment or who could be induced to seek placement with a new employer, (3) who either live in an area physically proximate to the proposed place of employment or who could be induced to relocate, (4) and whose qualifications, beyond the minimum, are at least equivalent to those of other available candidates and, thus, are realistically competitive in consideration for available positions. No such calculus is possible, absent extensive and intensive research of a character which, to the knowledge of the Office of General Administration, has not been undertaken to date by any agency.

Data are available from two sources which purport to refine somewhat the availability picture, through reference to occupational skills. There are two difficulties associated with reliable use of such information in connection with ascertaining availability. First, each source proceeds to a large extent from

different definitional bases, which in neither case relates consistently to the basic categories of analysis suggested at the outset of this discussion ("managerial", "professional", "technical", etc.) Second, many of the occupational categories included in those eclectic analyses are not apposite to the occupational emphases of the Office of General Administration. Nevertheless, there is some useful information to be derived from this material.

First, the Social and Economic Statistics Administration of the U. S. Department of Commerce has produced, on the basis of 1970 census data, a profile of the General Social and Economic Characteristics of North Carolina, which includes a breakdown by race and sex for broad occupational categories within the general North Carolina labor force. A review of this statistical data indicates that, for the general state population:

a. Managers and Administrators:

- (1) 84% male and 16% female;
- (2) 96% white and 4% black.

b. Professional (excluding technical workers):

- (1) 53% male and 47% female (the figures for female professionals include public school teachers at the elementary and secondary

level as the largest single component; elimination of this category from the statistical comparison produces a more realistic "professional" ratio, for present purposes, of approximately 28% female and 72% male);

(2) 88% white and 12% black.

c. Technical Workers:

(1) 82% male and 18% female;

(2) 95% white and 5% black.

d. Clerical Workers:

(1) 27% male and 73% female;

(2) 92% white and 8% black.

For the four-county area of Alamance, Chatham, Durham and Orange, the comparable figures are:

a. Managers and Administrators:

(1) 83% male and 17% female;

(2) 94% white and 6% black.

b. Professional (excluding technical workers):

(1) 57% male and 43% female (with appropriate adjustment

reflecting the predominance of females within the public elementary and secondary

teaching profession, a similar reduction of female percentage representation within the category is achieved);

(2) 89% white and 11% black.

c. Technical Workers:

(1) 74% male and 26% female;

(2) 92% white and 8% black.

d. Clerical Workers:

(1) 25% male and 75% female;

(2) 87% white and 13% black.

A second type of analysis is contained in a summary report prepared by the North Carolina State Personnel Board, based on 1972 data, which breaks down the total complement of classified state employment by substantive occupational category (see Appendix C). Because this analysis is keyed to substantive occupational content exclusively, without distinction between levels of responsibility, skill and remuneration, there is no exact correlation between some of the State Personnel categories and those broader categories of basic analysis such as "professional" and "technical." Thus, an appropriately selective use of the State Personnel data suggests:

a. Clerical and Office Services Classes (which include the classifications Accounting Clerk, Administrative Secretary, Stenographer, Clerk, Typist):

(1) 12.2% male and 87.8% female;

(2) 89% white and 11% black.

b. Legal, Administrative Management and Related Classes (which includes Administrative Officer and Administrative Assistant):

- (1) 64.9% male and 35.1% female;
- (2) 93.4% white and 9.6% black.

c. Institutional Services Classes (which includes Building Custodian, Housekeeping Assistant, General Utilities Man):

- (1) 59.7% male and 40.3% female;
- (2) 39.7% white and 61.3% black.

d. Skilled Trades and Allied Classes (which includes TVE Technicians of various categories):

- (1) 99.96% male and .04% female;
- (2) 03.9% white and 6.1% black.

It is acknowledged that the foregoing experiential data reflect only current utilization, as distinguished from total hypothetical availability. However, given the current limitations on information, the broader inquiry about availability must necessarily remain hypothetical.


With respect to the job contexts and types of employment here in question, "availability analyses" must be recognized, in candor, for what they are and for what they are not. The Office of General Administration does not purport nor profess to offer a scientific evaluation of "availability." Such an undertaking is not practicable (if indeed it is realistically even possible). Clearly it is not possible to assert in good faith that any conclusions drawn are the product of careful calculation of all of the salient variables. Accordingly, a necessary conclusion is that, given a dearth of reliable data, availability

studies amount, at best, to rough estimates and, at worst, to unrefined guesses.

Nevertheless, it would appear that with respect to both comparative utilization and projected availability, the following estimates are realistic as a basis for projection of any necessary goals for the Office of General Administration:

- a. "Managerial"
 - (1) By sex, 70% male and 30% female;
 - (2) By race, 90% white and 10% black.
- b. "Professional"
 - (1) By sex, 70% male and 30% female;
 - (2) By race, 88% white and 12% black.
- c. "Technical"
 - (1) By sex, 75% male and 25% female;
 - (2) By race, 90% white and 10% black.
- d. "Office and Clerical"
 - (1) By sex, 80% female and 20% male;
 - (2) By race, 85% white and 15% black.

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APPENDIX D

AVAILABILITY STUDIES AND HIRING GOALS

A. Faculty

(1) Availability

Determine, for the disciplines represented in your department, the total number of people who possess the formal educational qualifications (for example, degrees) you normally require for appointment to your faculty, and within that group the number who are Blacks, other minorities, women, and white males. If you cannot determine firm estimates of these numbers, you must provide us with your best approximations and an explanation of why you could not ascertain full information. Bear in mind that the pool of [available] personnel includes those who have received degrees over many years and who may now be employed or unemployed, not only those currently receiving degrees. We realize that many departments seek faculty members in an international and not a national market, but figures probably are not available except for the United States. You should explain to us any difficulty you have in finding availability figures for the market in which you recruit. The availability figures given should relate as nearly as is feasible to July 1, 1973. The bibliography attached provides you with some sources for determining this information. You are expected to make use of the information outlined in the bibliography and any additional information you yourself discover.

(2) Needs, 1973-76

Based on the number of faculty positions, by rank, shown on the current tabulation, determine for your department, on the basis of your recent experience and your best judgment in the light of all known factors (for example, stable enrollments, prospective retirements and resignations, acquisition of new positions, reduction of staff due to termination of federal funding, etc.) for the period of the three fiscal years (July 1, 1973 to June 30, 1976) the number of faculty positions you will have to fill by appointment, the special qualifications (for example, subdiscipline) to be required of each, and the rank (if known) that each position will carry.

(3) Goals

Determine in the light of the availability of Blacks, other minorities, women, and white males as indicated under (1) above, and your best judgment as to the availability to the University of Blacks, other minorities, women, and white males to meet the particular anticipated needs stated under (2) above, the number of Blacks, other minorities, women, and white males that you can reasonably expect to add to your faculty during the three fiscal year period on a full-time, non-visiting basis, with an indication of the rank to be held by each where that is now known. Optimism is to be admired but realism is essential, for we must sooner or later justify to HEW any failure to attain our own projected hiring goals for the categories of persons involved. Please note that your goals will cover a three year period

instead of three one year periods. However, your annual progress toward your three year goal will be carefully monitored by the Affirmative Action Officer.

B. Non-Faculty EPA Personnel

Note: This section does not apply to students enrolled in this University who are in consequence given appointments as teaching assistants and the like.

(1) Availability

Separate availability figures are required for each of the functional categories shown on your tabulation. Within each category, determine through means appropriate to your department the total number of people who possess the formal educational qualifications (for example, degrees) you normally require for EPA non-faculty appointments in your department, and within that group the number of Blacks, other minorities, women, and white males. This must necessarily be a more approximate determination than that involved in estimating the availability of faculty candidates. If you cannot determine firm estimates of these numbers, you should provide us with your best approximations and an explanation of why you could not ascertain full information. The availability figures should relate as nearly as feasible to July 1, 1973. The bibliography attached will provide you with some sources for determining this information.

(2) Needs, 1973-76

Based on the number of EPA non-faculty positions shown on the tabulation, and assuming that there will be no increase over the next three years in the number of EPA non-faculty positions available to your department, on the basis of your recent experience and your best judgment in the light of all known factors (for example, stable enrollment, prospective resignations and retirements, acquisition of new positions, loss of positions, etc.) for the period of the three fiscal years (July 1, 1973 to June 30, 1976), determine the number of non-faculty EPA positions, by appropriate functional category, that you will have to fill by appointment and the special qualifications to be required of each category.

(3) Goals

Determine in the light of the availability of Blacks, other minorities, women, and white males as indicated under (1) above, and your best judgment as to the actual availability to this University of Blacks, other minorities, women, and white males to meet the particular needs stated under (2) above, the number of Blacks, other minorities, women, and white males that you can reasonably expect to add to your EPA non-faculty ranks during the three fiscal year period and the functional category to which each will be assigned. Realism is essential here as in the case of faculty appointments. Please note that your goals will cover a three year period instead of three one year periods. However, your annual progress toward your three year goal will be carefully monitored by the Affirmative Action Officer.

5200 COTTON FIBRE

PROOF FIBRE



AVAILABILITY STUDY REPORTING FORMS

Form No. 1, page one

School/Department: _____

Individual Completing Form: _____

PART I - AVAILABLE POOL OF PROSPECTIVE FACULTY MEMBERS

1. State below the requirements as to education, experience, and achievement for members of your faculty at each academic rank.

2. How many people in the United States meet the requirements in #1?
(Complete the chart below for each type of appointment described above.)

	Number	Percent
White Male		
White Female		
Black Male		
Black Female		
Other Male		
Other Female		
TOTAL		100%

School/Department: _____

Individual Completing Form: _____

Form No. 1, page two

3. Explain how you arrived at the figures in the chart on page one.

a. List sources of data:

b. Describe the method(s) used for arriving at the figures recorded in the chart on page one. If you based your figures on a representative sample, please explain below:

c. Evaluate the accuracy and/or completeness of the data you have used:

d. Indicate particular problems encountered in trying to ascertain availability information:

School/Department: _____

Individual Completing Form: _____

Form No. 1, page three

4. If you ordinarily draw your faculty members from a smaller pool of candidates than the whole United States population in the profession,

a. Define that pool for each level and type of appointment you customarily make:

b. Complete the following chart for each of the pools defined above:

	Number	Percent
White Male		
White Female		
Black Male		
Black Female		
Other Male		
Other Female		
TOTAL		100%

School/Department: _____

Individual Completing Form: _____

Form No. 1, page four

5. Explain how you arrived at the figures in the chart on page three.

a. List sources of data:

b. Describe the method(s) used for arriving at the figures recorded in the chart on page three. If you based your figures on a representative sample, indicate how you justify this:

c. Evaluate the accuracy and/or completeness of the data you have used:

d. Indicate particular problems encountered in trying to ascertain availability information:

School/Department: _____

Individual Completing Form: _____

PART II - AVAILABLE POOL OF PROSPECTIVE EPA NON-FACULTY PERSONNEL

1. Outline below the basic educational and experiential requirements for appointment to your EPA non-faculty positions by functional category.

2. How many people in the United States meet the basic educational and experiential requirements outlined in #1 above by functional category? (Complete charts below)

OFFICIALS AND MANAGERS

	Number	Percent
White Male		
White Female		
Black Male		
Black Female		
Other Male		
Other Female		
TOTAL		100%

PROFESSIONALS

	Number	Percent
White Male		
White Female		
Black Male		
Black Female		
Other Male		
Other Female		
TOTAL		100%

TECHNICIANS

	Number	Percent
White Male		
White Female		
Black Male		
Black Female		
Other Male		
Other Female		
TOTAL		100%

School/Department: _____

Individual Completing Form: _____

Form No. 2, page two

3. Explain how you arrived at the figures in the charts on page one.

a. List sources of data:

b. Describe the method(s) used for arriving at the figures recorded in the charts on page one. If you based your figures on a representative sample, please explain below:

c. Evaluate the accuracy and/or completeness of the data you have used:

d. Indicate particular problems encountered in trying to ascertain availability information:

School/Department: _____

Individual Completing Form: _____

Form No. 2, page three

4. If you ordinarily draw your EPA non-faculty personnel from a smaller pool of candidates than the whole United States population noted under #2,

a. Describe the pool by functional category:

b. How many people constitute that special pool by category?

OFFICIALS AND MANAGERS

PROFESSIONAL

	Number	Percent
White Male		
White Female		
Black Male		
Black Female		
Other Male		
Other Female		
TOTAL		100%

	Number	Percent
White Male		
White Female		
Black Male		
Black Female		
Other Male		
Other Female		
TOTAL		100%

TECHNICIANS

	Number	Percent
White Male		
White Female		
Black Male		
Black Female		
Other Male		
Other Female		
TOTAL		100%

School/Department: _____

Individual Completing Form: _____

Form No. 1, page four

5. Explain how you arrived at the figures in the chart on page three.

a. List sources of data:

b. Describe the method(s) used for arriving at the figures recorded in the chart on page three. If you based your figures on a representative sample, indicate how you justify this:

c. Evaluate the accuracy and/or completeness of the data you have used:

d. Indicate particular problems encountered in trying to ascertain availability information:

School/Department: _____

Individual Completing Form: _____

Form No. 1, page three

4. If you ordinarily draw your faculty members from a smaller pool of candidates than the whole United States population in the profession,

a. Define that pool for each level and type of appointment you customarily make:

b. Complete the following chart for each of the pools defined above:

	Number	Percent
White Male		
White Female		
Black Male		
Black Female		
Other Male		
Other Female		
TOTAL		100%

School/Department: _____

Individual Completing Form: _____

Form No. 2, page four

5. Explain how you arrived at the figures in the charts on page three.

a. List sources of data:

b. Describe the method(s) used for arriving at the figures recorded in the charts on page three. If you based your figures on a representative sample, indicate how you justify this:

c. Evaluate the accuracy and/or completeness of the data you have used:

d. Indicate particular problems encountered in trying to ascertain availability information:

TABLE I

PRESENT FACULTY COMPLEMENT
 (According to October 1973 Tabulation)

TABLE II

PROJECTED FACULTY COMPLEMENT
 FOR ACADEMIC YEAR 1975-76
 (Reflecting Anticipated Promotions
 and your Projected Hiring Goals)

	White		Black		Other		Total		//////////	White		Black		Other		Total	
	M	F	M	F	M	F	M	F		M	F	M	F	M	F	M	F
FULL-TIME									//////////								
DEPARTMENT HEAD									//////////								
Professor									//////////								
Associate Professor									//////////								
Assistant Professor									//////////								
Instructor									//////////								
Lecturer									//////////								
SUB-TOTAL									//////////								
*PERMANENT PART-TIME									//////////								
Professor									//////////								
Associate Professor									//////////								
Assistant Professor									//////////								
Instructor									//////////								
Lecturer									//////////								
Visiting									//////////								
SUB-TOTAL									//////////								
TOTAL									//////////								

*PERMANENT PART-TIME - Individuals working less than full-time and being paid accordingly but hired for a term of 12 months or more or for a stated term of one academic year or more. This does not include joint appointments which should be reported as full-time by their major departments. The numbers which need to be filled in here are not supplied in the October tabulation and will need to come from your own

APPENDIX F

WORK SHEET FOR TABLE II

FULL TIME	Estimated Number of Positions Expected to Become Vacant (1973-1976)	Estimated Number of Newly Created Positions (1973-1976)	Total Positions to be filled (1973-76)	Projected Hiring Goals (based on the total positions to be filled) (1973-1976)								
				WHITE		BLACK		OTHER		TOTAL		
				M	F	M	F	M	F	M	F	
DEPARTMENT HEAD												
Professor												
Associate Professor												
Assistant Professor												
Instructor												
Lecturer												
SUB-TOTAL												
TOTAL	A	B	C									D
////////////////////												
PERMANENT PART TIME*												
Professor												
Associate Professor												
Assistant Professor												
Instructor												
Lecturer												
Visiting												
SUB-TOTAL												
TOTAL	A	B	C									D

Note: A + B = C
 C = D

*Individuals working less than full time and being paid accordingly but hired for a term of _____ months or more or for a stated term of one academic year or more.

AFFIRMATIVE ACTION PLAN

SCHOOL/DEPARTMENT _____

DATE _____

COMPLETED BY _____

TABLE III
TOTAL FACULTY COMPLEMENT
(According to October 1973 Tabulation)
See Table I

TABLE IV
PROJECTED FACULTY COMPLEMENT
(For Academic Year 1975-76)
See Table III

Availability Percentages	Full Time		Part Time		Total		See Note(e)	Full Time		Part Time		Total	
	No.	% (b)	No.	% (c)	No.	% (d)		No.	%	No.	%	No.	%
White Male													
White Female													
Black Male													
Black Female													
Other Male													
Other Female													
TOTAL		100%		100%		100%			100%		100%		100%

- (a) These percentages should be taken directly from the charts you completed in questions #2 or #4 of Form I.
- (b) These percentages should be computed on the basis of total number of full-time.
- (c) These percentages should be computed on the basis of total number of part-time.
- (d) These percentages should be computed on the basis of total number of full-time plus part-time.
- (e) In this column: place a + (plus) if the percentage in the column marked Total in Table III is higher than the percentage in the corresponding column marked Availability or place a - (minus) if the percentage in the column marked Total is lower than the percentage in the corresponding column marked Availability.

AFFIRMATIVE ACTION PLAN

SCHOOL/DEPARTMENT _____
 COMPLETED BY _____

DATE _____

WORK SHEET FOR TABLE VI

	Estimated Number of Positions Expected to Become Vacant (1973-1976)	Estimated Number of Newly Created Positions (1973-1976)	Total Positions to be filled (1973-76)	Projected Hiring Goals (based on the total positions to be filled) (1973-1976)										
				WHITE		BLACK		OTHER		TOTAL				
				M	F	M	F	M	F	M	F			
FULL-TIME														
Officials & Managers <i>* Do Not include Dept Heads</i>														
Professionals														
Technicians														
SUB-TOTAL														
TOTAL		A	B	C										D
////////////////////////////////////														
PERMANENT PART TIME*														
Officials & Managers														
Professionals														
Technicians														
SUB-TOTAL														
TOTAL		A	B	C										D

Note: A + B = C
 C = D

**Individuals working less than full time and being paid accordingly, but hired for a term of 12 months or more or for a stated term of one aca-

WORK SHEET FOR TABLE II

FULL TIME	Estimated Number of Positions Expected to Become Vacant (1973-1976)	Estimated Number of Newly Created Positions (1973-1976)	Total Positions to be filled (1973-76)	Projected Hiring Goals (based on the total positions to be filled) (1973-1976)									
				WHITE		BLACK		OTHER		TOTAL			
				M	F	M	F	M	F	M	F		
Department Head													
Professor													
Associate Professor													
Assistant Professor													
Instructor													
Lecturer													
SUB-TOTAL													
TOTAL		A	B	C									D
////////////////////////////////////													
PERMANENT PART TIME*													
Professor													
Associate Professor													
Assistant Professor													
Instructor													
Lecturer													
Visiting													
SUB-TOTAL													
TOTAL		A	B	C									D

Note: A + B = C
 C = D

*Individuals working less than full time and being paid accordingly but hired for a term of 12 months or more or for a stated term of one academic year or more.

AFFIRMATIVE ACTION PLAN

SCHOOL/DEPARTMENT _____
 COMPLETED BY _____

EPA NON-FACULTY

DATE _____

WORK SHEET FOR TABLE VI

	Estimated Number of Positions Expected to Become Vacant (1973-1976)	Estimated Number of Newly Created Positions (1973-1976)	Total Positions to be filled (1973-76)	Projected Hiring Goals (based on the total positions to be filled) (1973-1976)							
				WHITE		BLACK		OTHER		TOTAL	
				M	F	M	F	M	F	M	F
FULL-TIME											
Officials & Managers (Do not include Dept. Heads) Professionals											
Technicians											
SUB-TOTAL											
TOTAL	A	B	C								
////////////////////////////////////											
PERMANENT PART TIME*											
Officials & Managers											
Professionals											
Technicians											
SUB-TOTAL											
TOTAL	A	B	C								

Note: A + B = C
 C = D

*Individuals working less than full time and being paid accordingly but hired for a term of 12 months or more or for a stated term of one academic year.

AFFIRMATIVE ACTION PLAN
EFA FACULTY

SCHOOL/DEPARTMENT _____

DATE _____

COMPLETED BY _____

TABLE III
TOTAL FACULTY COMPLEMENT
(According to October 1973 Tabulation)
See Table I

TABLE IV
PROJECTED FACULTY COMPLEMENT
(For Academic Year 1975-76)
See Table III

Availability Percentage (a)	Full Time		Part Time		Total		See Note (e)	Full Time		Part Time		Total	
	No.	% (b)	No.	% (c)	No.	% (d)		No.	%	No.	%	No.	%
White Male													
White Female													
Black Male													
Black Female													
Other Male													
Other Female													
TOTAL		100%		100%		100%			100%		100%		100%

- (a) These percentages should be taken directly from the charts you completed in questions #2 or #4 of Form I.
- (b) These percentages should be computed on the basis of total number of full-time.
- (c) These percentages should be computed on the basis of total number of part-time.
- (d) These percentages should be computed on the basis of total number of full-time plus part-time.
- (e) In this column: place a + (plus) if the percentage in the column marked Total in Table III is higher than the percentage in the corresponding column marked Availability or place a - (minus) if the percentage in the column marked Total is lower than the percentage in the corresponding column marked Availability.

WEST RITCHIE ST.

WESLEY BOND



APPENDIX G

I. INTRODUCTION: EQUAL EMPLOYMENT OPPORTUNITY

The University of North Carolina is subject to the requirements of Executive Order 11246, as interpreted and administered by the Secretary of Labor and by the Department of Health, Education and Welfare. This program of federal regulation, designed to insure equality of employment opportunity without reference to considerations of race, color, religion, sex or national origin, embodies two basic requirements. First, the University must insure the absence of discrimination in the formulation, statement and application of all personnel policies and practices. Second, the University must undertake positive efforts designed to help eliminate various possible impediments to the full utilization of women and members of minority groups within the employee complement, without necessary reference to whether such impediments are the product of discriminatory practice or intent. Most particularly, this type of affirmative effort must address any demonstrated past underrepresentation or underutilization of women or members of minority groups. The two components of this University obligation are treated separately in this plan.

A. University Commitment to Nondiscriminatory Policies and Practices

The University is committed, without reservation, to the principle that employees shall be identified initially and thereafter differentiated among only on the basis of good-faith assessments of individual professional merit. Therefore, University policy prohibits and employment practices will operate to prevent discrimination, affecting any employee or prospective employee,

which is based on considerations of race, color, religion, sex or national origin. Any other policy would be morally indefensible and inconsistent with the pursuit of organizational excellence.

The principle of equal employment opportunity shall apply with respect to all incidents of the employment relationship, including: (1) initial consideration for employment (2) job placement and assignment of responsibilities, (3) evaluation of performance, (4) promotion and advancement, (5) compensation and fringe benefits, (6) access to training and other professional-development opportunities (7) formulation and application of personnel rules and regulations, (8) access to facilities, and (9) layoff, discipline and termination.

The personnel policies and practices of the University will be monitored continuously to determine whether any individual or class has been or is being affected adversely, contrary to the principle of equal employment opportunity. In any case where discrimination based on race, religion, color, sex or national origin is demonstrated, prompt remedial action will be taken.

All employees of the University are expected to support the principle of and contribute to the realization of equal employment opportunity. Any employee with responsibility and authority in the area of personnel relations who imposes any detriment on any other employee through failure or refusal to subscribe to the principle of equal employment opportunity shall be subject to appropriate internal disciplinary action.

B. University Commitment to Increasing Employment Opportunity

The University is committed to the elimination of any demonstrated underutilization of women and members of minority groups within its staff complement.

It is acknowledged that there is a national legacy of prejudice and ignorance which has curtailed unjustifiably the employment opportunities of women and members of minority groups, in both the public and private sectors of employment. In order to enhance significantly and promptly the employment opportunities of those who have suffered disadvantage in the past, it is necessary to do more than simply insure nondiscriminatory employment practices. Accordingly, within its area of influence, the University will contribute to this national remedial effort by implementing a program of positive effort designed to encourage the identification, recruitment, employment and promotion of additional qualified members of groups which formerly have suffered disadvantage in the employment market. More particularly, where there is reasonable evidence that members of a particular class have been underrepresented or underutilized within areas of the staff complement, specific goals and timetables designed to remedy that underrepresentation are being established.

As an institution which seeks to encourage excellence in all areas of endeavor, a university must maintain high standards in the evaluation of employees and prospective employees; it must also apply those standards fairly and consistently. Thus, the conscientious search for and effort to employ additional women and members of minority groups pursuant to established goals and timetables shall not entail a reduction of premium on quality nor a conferral of advantage on any person because of race, color, religion, sex or national origin. Rather, the affirmative efforts of the University shall be directed toward enlarging the opportunity for and incidence of fair competition, by qualified members of previously underrepresented groups, for available positions, appointments and promotions.

52 1/2 COTTON LINES

WESLON BOND



APPENDIX H

PUBLICIZING THE EQUAL EMPLOYMENT OPPORTUNITY POLICY

Dissemination of information relative to the Plan is designed to accomplish two fundamental purposes. First, if equality of employment opportunity is to remain a reality with respect to incumbent personnel, supervisory personnel must understand their responsibilities under the plan and supervised personnel must understand their rights under the plan. Second, the broader community of which the University is a part must be aware of this comprehensive commitment to nondiscriminatory practices and affirmative action, to the end that the University will become an increasingly attractive place of prospective employment for qualified women and members of minority groups.

A. Internal Dissemination of Information

<u>Action</u>	<u>Date of Initiation</u>	<u>Schedule</u>	<u>Responsibility</u>
1. Post summary of provisions of Plan on employee informational bulletin boards (See Appendix A)	Date Plan approved by HEW	Continuous	Associate EEO Director
2. Furnish copy of summary of Plan to each incumbent employee	Date Plan approved by HEW	Continuous	Associate EEO Director
3. Maintain copies of full text of Plan on file, to which all employees and applicants for employment shall have access upon request.	Date Plan approved by HEW	Continuous	EEO Director, Associate EEO Director

<u>Action</u>	<u>Date of Initiation</u>	<u>Schedule</u>	<u>Responsibility</u>
4. Special meeting with administrative and supervisory personnel to explain contents, purposes, and rights and responsibilities under Plan	Within 30 days after Plan approved by HEW	Annual	EEO Director, Associate EEO Director
5. Special meetings with all supervised personnel, by appropriate division of supervision, to explain contents, purposes, and rights and responsibilities under Plan	Commencing schedule within 30 days after Plan approved by HEW	Annual	EEO Director Associate EEO Director, and pertinent division supervisors
6. Furnish summary of provisions of Plan to all prospective employees who file application and are interviewed for employment <u>(See Appendix A)</u>	Date Plan approved by HEW	Continuous	For employment positions subject to the State Personnel Act: Associate EEO Director; for employment positions not subject to the State Personnel Act: EEO Director
7. Furnish copy of summary of Plan to all new hires and explain contents, purposes, and rights and responsibilities under Plan	Date Plan approved by HEW	Continuous, within 10 days of date of hire	For employment positions subject to the State Personnel Act: Associate EEO Director; for other employees: EEO Director
8. Post federally required EEO notices on employee informational bulletin boards	Immediate	Continuous	Associate EEO Director
9. Publicize adoption and contents of Plan in appropriate office publications	Within 30 days after Plan approved by HEW	Annual	EEO Director

<u>Action</u>	<u>Date of Initiation</u>	<u>Schedule</u>	<u>Responsibility</u>
10. Publicize EEO developments, progress reports in office publications	Immediate	Continuous, as periodically warranted	EEO Director
11. Provide access to all employees for private counseling concerning problems related to EEO	Immediate	Continuous, at request of affected employee	EEO Director, Associate EEO Director

B. External Dissemination of Information

<u>Action</u>	<u>Date of Initiation</u>	<u>Schedule</u>	<u>Responsibility</u>
1. Inform all recruiting sources, verbally and in writing, of contents and purposes of Plan, stipulating that minorities and women be recruited and referred on a nondiscriminatory basis	Within 30 days after Plan approved by HEW	Every 6 mos. for established sources, immediately upon identification of new source	EEO Director, Associate EEO Director
2. Incorporate the Equal Opportunity clause in all purchase orders, leases, contracts, as required by federal regulations	Immediate	Continuous	EEO Director, Associate EEO Director
3. Incorporate the Equal Opportunity clause on all letterhead stationery	Immediate	Continuous	Associate EEO Director
4. Publicize adoption and contents of Plan in public press and in office publications distributed externally	Within 30 days after Plan approved by HEW	Annual	EEO Director
5. Require that the Equal Opportunity clause appear in connection with any published employment advertising	Immediate	Continuous	Associate EEO Director

<u>Action</u>	<u>Date of Initiation</u>	<u>Schedule</u>	<u>Responsibility</u>
6. Provide written notification of Plan and basic contents to public and private organizations interested in employment opportunities for women and minorities; community agencies and leaders; secondary schools, colleges, and technical and business institutes	Within 30 days after Plan approved by HEW	Annual	EEO Director, Associate EEO Director
7. Provide written notification of Plan to all sub-contractors, vendors, and suppliers, requesting appropriate action on their part	Within 30 days after Plan approved by HEW	Annual	EEO Director, Associate EEO Director
8. Publicize EEO progress, appointments of new personnel, promotions, etc. relating to EEO objectives, in public press and in office publications distributed externally	Immediate	Continuous, as periodical-ly warranted	EEO Director

REVISED ORDER
No. 4

U.S. DEPARTMENT OF LABOR
OFFICE OF FEDERAL CONTRACT COMPLIANCE
WASHINGTON, D.C. 20210

CHAPTER 60 -- Office of Federal Contract Compliance,
Equal Employment Opportunity, Department of Labor

(Reprint from FEDERAL REGISTER, VOL. 36, NO. 234--SATURDAY, DECEMBER 4, 1971)

Title 41--PUBLIC CONTRACTS
AND PROPERTY MANAGEMENT

Chapter 60--Office of Federal Contract Compliance, Equal Employment Opportunity, Department of Labor

PART 60-2--AFFIRMATIVE ACTION PROGRAMS

On August 31, 1971, notice of proposed rule making was published in the Federal Register (36 F.R. 17419) with regard to amending Chapter 60 of Title 41 of the Code of Federal Regulations by adding a new Part 60-2, dealing with affirmative action programs. Interested persons were given 30 days in which to submit written comments, suggestions, or objections regarding the proposed amendments.

Having considered all relevant material submitted, I have decided to, and do hereby amend Chapter 60 of Title 41 of the Code of Federal Regulations by adding a new Part 60-2, reading as follows:

Subpart A--General

- Sec. 60-2.1 Title, purpose and scope.
- 60-2.2 Agency Action.

Subpart B--Required Contents of Affirmative Action Programs

- 60-2.10 Purpose of affirmative action program.
- 60-2.11 Required utilization analysis.
- 60-2.12 Establishment of goals and timetables.
- 60-2.13 Additional required ingredients of affirmative action programs.
- 60-2.14 Compliance status.
- Subpart C--Methods of Implementing the Requirements of Subpart B
- 60-2.20 Development or reaffirmation of the equal employment opportunity policy.
- 60-2.21 Dissemination of the policy.
- 60-2.22 Responsibility for implementation.
- 60-2.23 Identification of problem areas by examination and job classification.
- 60-2.24 Development and execution of programs.
- 60-2.25 Internal audit and reporting systems.
- 60-2.26 Support of action programs.

Subpart D--Miscellaneous

- 60-2.30 Use of aids.
- 60-2.31 Penalties.
- 60-2.32 Supercedure.

Authority: The provisions of this Part 60-2 issued pursuant to Sec. 201, Executive Order 11246 (36 F.R. 12419).

Subpart A--General

§ 60-2.1 Title, purpose and scope.

This part shall also be known as "Revised Order No. 4" and shall cover non-construction contractors. Section 60-1.40 of this Chapter, Affirmative Action Compliance Programs, requires that within 120 days from the commencement of a contract each prime contractor or subcontractor with 50 or more employees and a contract of \$50,000 or more develop a written affirmative action compliance program for each of its establishments, and such contractors are now further required to revise existing written affirmative action programs to include the changes embodied in this order within 120 days of its publication in the Federal Register. A review of agency compliance surveys indicates that many contractors do not have affirmative action programs on file at the time an establishment is visited by a compliance investigator. This part details the agency review procedure and the results of a contractor's failure to develop and maintain an affirmative action program and then set forth detailed guidelines to be used by contractors and Government agencies in developing and judging these programs as well as the good faith effort required to transform the programs from paper commitments to equal employment opportunity. Subparts B and C are concerned with affirmative action plans only.

Relief for members of an "affected class" who, by virtue of past discrimination, continue to suffer the present effects of that discrimination must either be included in the contractor's affirmative action program or be embodied in a separate written "corrective action" program. An "affected class" problem must be remedied in order for a contractor to be considered in compliance. Section 60-2.2 herein pertaining to an acceptable affirmative action program is also applicable to the failure to remedy discrimination against members of an "affected class."

§ 60-2.2 Agency action.

(a) Any contractor required by § 60-1.40 of this chapter to develop an affirmative action program at each of its establishments who has not complied fully with that section is not in compliance with Executive Order 11246, as amended (36 F.R. 12319). If such program is not developed and found to be acceptable in accordance with the standards and guidelines set forth in §§ 60-2.10 through 60-2.32, the contractor is unable to comply with the equal employment opportunity clause.

(b) If, in determining such contractor's responsibility for an award of a contract it comes to the contracting officer's attention, through sources within his agency or through the Office of Federal Contract Compliance or other Government agencies, that the contractor has not developed an acceptable affirmative action program at each of his establishments, the contracting officer shall notify the Director and declare the contractor-bidder nonresponsible unless he can otherwise affirmatively determine that the contractor is able to comply with his equal employment obligations or, unless, upon review, it is determined by the Director that substantial issues of law or fact exist as to the contractor's responsibility to the extent that a hearing is, in his sole judgment, required prior to a determination that the contractor is nonresponsible. Provided, That during any pre-award conference every effort shall be made through the processes of conciliation, mediation and persuasion to develop an acceptable affirmative action program meeting the standards and guidelines set forth in §§ 60-2.10 through 60-2.32 so that, in the performance of his contract, the contractor is able to meet his equal employment obligations in accordance with the equal opportunity clause and applicable rules, regulations, and orders. *Provided further*, That when the contractor-bidder is declared nonresponsible more than once for inability to comply with the equal employment opportunity clause a notice setting a timely hearing date shall be issued concurrently with the second nonresponsible determination in accordance with the provisions of § 60-1.26 proposing to declare such contractor-bidder ineligible for future contracts and subcontracts.

(c) Immediately upon finding that a contractor has no affirmative action program or that his program is not acceptable to the contracting officer, the compliance agency representative or the representative of the Office of Federal Contract Compliance, whichever has made such a finding, shall notify officials of the appropriate compliance agency and the Office of Federal Contract Compliance of such fact. The compliance agency shall issue a notice to the contractor giving him 30 days to show cause why enforcement proceedings under section 209(b) of Executive Order 11246, as amended, should not be instituted.

(d) If the contractor fails to show good cause for his failure or fails to remedy that failure by developing and implementing an acceptable affirmative action program within 30 days, the compliance agency, upon the approval of the

Director, shall immediately issue a notice of proposed cancellation. Termination of existing contracts or subcontracts and debarment from future contracts and subcontracts pursuant to § 60-1.22(b), giving the contractor 10 days to request a hearing. If a request for hearing has not been received within 10 days from such notice, such contractor will be declared ineligible for future contracts and current contracts will be terminated for default.

(2) During the "show cause" period of 30 days every effort shall be made by the compliance agency through conciliation, mediation, and persuasion to resolve the deficiencies which led to the determination of nonresponsibility. If satisfactory adjustments designed to bring the contractor into compliance are not concluded, the compliance agency, with the prior approval of the Director, shall promptly commence formal proceedings leading to the cancellation or termination of existing contracts or subcontracts and debarment from future contracts and subcontracts under § 60-1.22(b) of this chapter.

(d) During the "show cause" period and formal proceedings, each contracting agency must continue to determine the contractor's responsibility in considering whether or not to award a new or additional contract.

Subpart B—Required Contents of Affirmative Action Programs

§ 60-2.10 Purpose of affirmative action program.

An affirmative action program is a set of specific and result-oriented procedures to which a contractor commits himself to apply every good faith effort. The objective of those procedures plus such efforts is equal employment opportunity. Procedures without effort to make them work are meaningless, and effort, undirected by specific and meaningful procedures, is inadequate. An acceptable affirmative action program must include an analysis of areas within which the contractor is deficient in the utilization of minority groups and women, and further, goals and timetables to which the contractor's good faith efforts must be directed to correct the deficiencies and, thus to increase materially the utilization of minorities and women, at all levels and in all segments of his work force where deficiencies exist.

§ 60-2.11 Required utilization analysis.

Based upon the Government's experience with compliance reviews under the Executive order programs and the contractor reporting system, minority groups are most likely to be underutilized in departments and jobs within departments that fall within the following Employer's Information Report (EEO-1) designations: officials and managers, professionals, technicians, sales workers, office and clerical and craftsmen (skilled). As categorized by the EEO-1 designations, women are likely to be underutilized in departments and jobs within departments as follows: officials

and managers, professionals, technicians, sales workers (except over-the-counter sales in certain retail establishments), craftsmen (skilled and semi-skilled). Therefore, the contractor shall direct special attention to such jobs in his analysis and goal setting for minorities and women. Affirmative action programs must contain the following information:

(a) An analysis of all major job classifications at the facility, with explanation if managers or women are currently being underutilized in any one or more job classifications (job "classification" herein meaning one or a group of jobs having similar content, wage rates and opportunities). "Underutilization" is defined as having fewer minorities or women in a particular job classification than would reasonably be expected by their availability. In making the work force analysis, the contractor shall conduct such analysis separately for minorities and women.

(1) In determining whether minorities are being underutilized in any job classification the contractor will consider at least all of the following factors:

(i) The minority population of the labor area surrounding the facility;

(ii) The size of the minority unemployment force in the labor area surrounding the facility;

(iii) The percentage of the minority work force as compared with the total work force in the immediate labor area;

(iv) The general availability of minorities having requisite skills in the immediate labor area;

(v) The availability of promotable and transferable minorities within the contractor's organization;

(vi) The existence of training institutions capable of training persons in the requisite skills; and

(vii) The degree of training which the contractor is reasonably able to undertake as a means of making all job classes available to minorities.

(2) In determining whether women are being underutilized in any job classification, the contractor will consider at least all of the following factors:

(i) The size of the female unemployment force in the labor area surrounding the facility;

(ii) The percentage of the female workforce as compared with the total workforce in the immediate labor area;

(iii) The general availability of women having requisite skills in the immediate labor area;

(iv) The availability of women having requisite skills in an area in which the contractor can reasonably recruit;

(v) The availability of women seeking employment in the labor or recruitment area of the contractor;

(vi) The availability of promotable and transferable female employees within the contractor's organization;

(vii) The existence of training institutions capable of training persons in the requisite skills; and

(viii) The degree of training which the contractor is reasonably able to undertake as a means of making all job classes available to women.

§ 60-2.12 Establishment of goals and timetables.

(a) The goals and timetables developed by the contractor should be attainable in terms of the contractor's analysis of his deficiencies and his entire affirmative action program. Thus, in establishing the size of his goals and the length of his timetables, the contractor should consider the results which could reasonably be expected from his putting forth every good faith effort to make his overall affirmative action program work. In determining levels of goals, the contractor should consider at least the factors listed in § 60-3.11.

(b) Involve personnel relations staff, department and division heads, and local and unit managers in the goal setting process.

(c) Goals should be significant, measurable and attainable.

(d) Goals should be specific for planned results, with timetables for completion.

(e) Goals may not be rigid and inflexible quotas which must be met, but must be targets reasonably attainable by means of applying every good faith effort to analyze all aspects of the entire affirmative action program work.

(f) In establishing timetables to meet goals and commitments, the contractor will consider the anticipated expansion, contraction and turnover of and in the work force.

(g) Goals, timetables and affirmative action commitments must be designed to correct any identifiable deficiencies.

(h) Where deficiencies exist and where numbers or percentages are relevant in developing corrective action, the contractor shall establish and set forth specific goals and timetables separately for minorities and women.

(i) Such goals and timetables, with supporting data and the analysis thereof shall be a part of the contractor's written affirmative action program and shall be maintained at each establishment of the contractor.

(j) Where the contractor has not established a goal, his written affirmative action program must specifically analyze each of the factors listed in § 60-2.11 and must detail his reason for a lack of goal.

(k) In the event it comes to the attention of the compliance agency or the Office of Federal Contract Compliance that there is a substantial disparity in the utilization of a particular minority group or men or women of a particular minority group, the compliance agency or OFCC may require separate goals and timetables for such minority group and may further require, where appropriate, such goals and timetables by sex for such group for such job classifications and organizational units specified by the compliance agency or OFCC.

(1) Support data for the required analysis and program shall be compiled and maintained as part of the contractor's affirmative action program. This data will include but not be limited to progression line charts, seniority rosters, applicant flow data, and applicant rejection ratios indicating minority and sex status.

(2) Copies of affirmative action programs and/or copies of support data shall be made available to the compliance agency or the Office of Federal Contract Compliance, at the request of either, for such purposes as may be appropriate to the fulfillment of their responsibilities under Executive Order 11246, as amended.

§ 60-2.13 Additional required ingredients of affirmative action programs.

Effective affirmative action programs shall contain, but not necessarily be limited to, the following ingredients:

(a) Development or reaffirmation of the contractor's equal employment opportunity policy in all personnel actions.

(b) Formal internal and external dissemination of the contractor's policy.

(c) Establishment of responsibilities for implementation of the contractor's affirmative action program.

(d) Identification of problem areas (deficiencies) by organizational units and job classification.

(e) Establishment of goals and objectives by organizational units and job classification, including timetables for completion.

(f) Development and execution of action oriented programs designed to eliminate problems and further designed to attain established goals and objectives.

(g) Design and implementation of internal audit and reporting systems to measure effectiveness of the total program.

(h) Compliance or personnel policies and practices with the Sex Discrimination Guidelines (EEOC Part 60-20).

(i) Active support of local and national community action programs and community service programs, designed to improve the employment opportunities of minorities and women.

(j) Consideration of minorities and women not currently in the workforce having requisite skills who can be recruited through affirmative action measures.

§ 60-2.14 Compliance status.

The contractor's compliance status shall be judged clear by whether or not he meets his goals and meets his timetables. Failure of such contractor's compliance posture shall be reviewed and corrected by reviewing the contents of his program, the extent of his compliance to this program, and his good faith efforts to make his program work toward the reduction of the program's deficit within the timetables set for compliance. Where failure in outline of contract's procedures, their construction and actual effects are due to a contractor for establishing, implementing, and following an acceptable affirmative action program.

Subpart C—Methods of Implementing the Requirements of Subpart B

§ 60-2.20 Development or reaffirmation of the equal employment opportunity policy.

(a) The contractor's policy statement should indicate the chief executive officer's attitude on the subject matter, assign overall responsibility and provide for a reporting and monitoring procedure. Specific items to be mentioned should include, but not limited to:

(1) Recruit, hire, train, and promote persons in all job classifications, without regard to race, color, religion, sex, or national origin, except where sex is a bona fide occupational qualification. (The term "bona fide occupational qualification" has been construed very narrowly under the Civil Rights Act of 1964. Under Executive Order 11246 as amended and this part, this term will be construed in the same manner.)

(2) Base decisions on employment so as to further the principle of equal employment opportunity.

(3) Insure that promotion decisions are in accord with principles of equal employment opportunity by imposing only valid requirements for promotional opportunities.

(4) Insure that all personnel actions such as compensation, benefits, transfers, layoffs, return from leave, company sponsored training, education, tuition assistance, social and recreation programs, will be administered without regard to race, color, religion, sex, or national origin.

§ 60-2.21 Dissemination of the policy.

(a) The contractor should disseminate his policy internally as follows:

(1) Include it in contractor's policy manual.

(2) Publish it in company newspaper, magazine, annual report and other media.

(3) Conduct special meetings with executive, management, and supervisory personnel to explain intent of policy and individual responsibility for effective implementation, making clear the chief executive officer's attitude.

(4) Schedule special meetings with all other employees to discuss policy and explain individual employee responsibilities.

(5) Disseminate the policy thoroughly in both employee orientation and management training programs.

(6) Meet with union officials to inform them of policy, and request their cooperation.

(7) Include nondiscrimination clauses in all union contracts, and review all contract provisions to ensure they are nondiscriminatory.

(8) Publish articles covering EEO programs, progress reports, promotions, etc., of minority and female employees, in company publications.

(9) Post the policy on company bulletin boards.

(10) When employees are featured in press or company advertising, employee handbooks or similar publications both minority and nonminority, men and women should be pictured.

(11) Communicate to employees the existence of the contractor's affirmative action program and make available such elements of his program as will enable such employees to know of and avail themselves of its benefits.

(12) The contractor should disseminate his policy externally as follows:

(1) Inform all recruiting sources verbally and in writing of company policy, stipulating that these sources actively recruit and refer minorities and women for all positions listed.

(2) Incorporate the Equal Opportunity clause in all purchase orders, leases, contracts, etc., covered by Executive Order 11246, as amended, and its implementing regulations.

(3) Notify minority and women's organizations, community agencies, community leaders, secondary schools and colleges, of company policy, preferably in writing.

(4) Communicate to prospective employees the existence of the contractor's affirmative action program and make available such elements of his program as will enable such prospective employees to know of and avail themselves of its benefits.

(5) When employees are pictured in consumer or help wanted advertising, both minorities and nonminority men and women should be shown.

(6) Send written notification of company policy to all subcontractors, vendors and suppliers requesting appropriate action on their part.

§ 60-2.22 Responsibility for implementation.

(a) An executive of the contractor should be appointed as director or manager of company Equal Opportunity Programs. Depending upon the size and geographical alignment of the company, this may be his or her sole responsibility. He or she should be given the necessary top management support and status to execute the assignment. His or her identity should appear on all internal and external communications on the company's Equal Opportunity Programs. His or her responsibilities should include, but not necessarily be limited to:

(1) Developing policy statements, affirmative action programs, internal and external communication techniques.

(2) Assisting in the identification of problem areas.

(3) Assisting line management in arriving at solutions to problems.

(4) Designing and implementing audit and reporting systems, etc.

(5) Measure effectiveness of the contractor's programs.

(6) Indicate need for remedial action.

(7) Determine the degree to which the contractor's goals and objectives have been attained.

(8) Serve as liaison between the contractor and enforcement agencies.

(9) Serve as liaison between the contractor and minority organizations, women's organizations and community action groups concerned with employment opportunities of minorities and women.

(7) Keep management informed of latest developments in the entire equal opportunity area.

(b) Line responsibilities should include, but not be limited to, the following:

(1) Assistance in the identification of problem areas and establishment of local and unit goals and objectives.

(2) Active involvement with local minority organizations, women's organizations, community action groups and community service programs.

(3) Periodic audit of training programs, hiring and promotion patterns to remove impediments to the attainment of goals and objectives.

(4) Regular discussions with local managers, supervisors and employees to be certain the contractor's policies are being followed.

(5) Review of the qualifications of all employees to insure that minorities and women are given full opportunities for transfers and promotions.

(6) Career counseling for all employees.

(7) Periodic audit to insure that each location is in compliance in area such as:

(a) Posters are properly displayed.

(b) All facilities, including company housing, which the contractor maintains for the use and benefit of his employees, are in fact segregated, both in policy and use. If the contractor provides facilities such as dormitories, locker rooms and rest rooms, they must be comparable for both sexes.

(c) Minority and female employees are afforded a full opportunity and are encouraged to participate in all company sponsored educational, training, recreational and social activities.

(2) Supervisors should be made to understand that their work performance is being evaluated on the basis of their equal employment opportunity efforts and results, as well as other criteria.

(9) It shall be a responsibility of supervisors to take actions to prevent harassment of employees placed through affirmative action efforts.

§ 60-2.23 Identification of problem areas by organizational units and job classifications.

(a) An in-depth analysis of the following should be made, paying particular attention to transfers and these categories listed in § 60-2.14 (1).

(1) Composition of the work force by minority group status and sex.

(2) Composition of applicant flow by minority group status and sex.

(3) The total selection process including position descriptions, position titles, worker specifications, application forms, interview procedures, test administration, test validity, referral procedures, final selection process, and similar factors.

(4) Transfer and promotion practices.

(5) Facilities, company sponsored recreation and social events, and special programs such as educational assistance.

(6) Seniority practices, and seniority provisions of union contracts.

(7) Apprenticeship programs.

(8) All company training programs, formal and informal.

(9) Work force attitude.

(10) Technical phases of compliance, such as poster and notification to labor unions, retention of applications, notification to subcontractors, etc.

(b) If any of the following items are found in the analysis, special corrective action should be appropriate.

(1) An "underutilization" of minority or women in specific work classifications.

(2) Literal and/or vertical movement of minority or female employees occurring at a lesser rate compared to work force mix than that of nonminority or male employees.

(3) The selection process eliminates a significantly higher percentage of minorities or women than nonminorities or men.

(4) Application and related preemployment forms not in compliance with Federal legislation.

(5) Position descriptions inaccurate in relation to actual functions and duties.

(6) Tests and other selection techniques not validated as required by the OFCC Order on Employee Testing and Other Selection Procedures.

(7) Test forms not validated by location, work performance and inclusion of minorities and women in sample.

(8) Referral ratio of minorities or women to the hiring supervisor or manager indicates a significantly higher percentage are being rejected as compared to nonminority and male applicants.

(9) Minorities or women are excluded from or are not participating in company sponsored activities or programs.

(10) De facto segregation still exists at some facilities.

(11) Seniority provisions contribute to overt or inadvertent discrimination, i.e., a disparity by minority group status or sex exists between length of service and types of job held.

(12) Non-support of company policy by managers, supervisors or employees.

(13) Minorities or women underutilized or significantly underrepresented in training or career improvement programs.

(14) No formal techniques established for evaluating effectiveness of EEO programs.

(15) Lack of access to suitable housing inhibits recruitment efforts and employment of qualified minorities.

(16) Lack of suitable transportation (public or private) to the work place inhibits minority employment.

(17) Labor unions and subcontractors not notified of their responsibilities.

(18) Purchase orders do not contain EEO clause.

(19) Posters not on display.

§ 60-2.24 Development and execution of programs.

(a) The contractor should conduct detailed analysis of position descriptions to insure that they accurately reflect position functions, and are consistent for the same position from one location to another.

(b) The contractor should validate worker specifications by division, department, location or other organizational unit and by job category using job performance criteria. Special attention should be given to academic, experience and skill requirements to insure that the requirements in themselves do not constitute inadvertent discrimination. Specifications should be consistent for the same job classification in all locations and should be free from bias as regards to race, color, religion, sex, or national origin, except where sex is a bona fide occupational qualification. Where requirements screen out a disproportionate number of minorities or women such requirements should be professionally validated to job performance.

(c) Approved position descriptions and worker specifications, when used by the contractor, should be made available to all members of management involved in the recruiting, screening, selection, and promotion process. Copies should also be distributed to all recruiting sources.

(6) The contractor should evaluate the total selection process to insure freedom from bias and, thus, aid the attainment of goals and objectives.

(1) All personnel involved in the recruiting, screening, selection, promotion, disciplinary, and related processes should be carefully selected and trained to insure elimination of bias in all personnel actions.

(2) The contractor shall observe the requirements of the OFCC Order pertaining to the validation of employee tests and other selection procedures.

(3) Selection techniques other than tests may also be improperly used so as to have the effect of discriminating against minority groups and women. Such techniques include but are not restricted to, unscored interviews, unscored or casual application forms, arrest records, credit checks, considerations of marital status or dependency on minor children. Where there exist data suggesting that such unfair discrimination or exclusion of minorities or women exists, the contractor should analyze his unscored procedures and eliminate them if they are not objectively valid.

(c) Suggested techniques to improve recruitment and increase the flow of minority or female applicants follow:

(1) Certain organizations such as the Urban League, Job Corps, Equal Opportunity Programs, Inc., Concentrated Employment Programs, Neighborhood Youth Corps, Secondary Schools, Colleges, and City Colleges with high minority enrollment, the State Employment Service, specialized employment agencies, Aspira, LULAC, SER, the G.I. Forum, the Commonwealth of Puerto Rico are normally prepared to refer minority applicants. Organizations prepared to refer women with specific skills are: National Organization for Women, Welfare Rights Organizations, Women's Equity Action League, Talara Bank from Business and Professional Women (including 26 women's organizations), Professional Women's Caucus, Intercultural Association of University Women, Negro Women's sororities and service

groups such as Delta Sigma Theta, Alpha Kappa Alpha, and Zeta Phi Beta; National Council of Negro Women, American Association of University Women, YWCA, and sectarian groups such as Jewish Women's Groups, Catholic Women's Groups and Protestant Women's Groups, and women's colleges. In addition, community leaders as individuals shall be added to recruiting sources.

(2) Formal briefing sessions should be held, preferably on company premises, with representatives from these recruiting sources. Briefings, presentations by minority and female employees, clear and concise explanations of current and future job openings, position descriptions, worker specifications, explanations of the company's selection process, and recruiting literature should be an integral part of the briefings. Formal arrangements should be made for referral of applicants, followup with sources, and feedback on disposition of applicants.

(3) Minority and female employees, using procedures similar to subparagraph (2) of this paragraph, should be actively encouraged to refer applicants.

(4) A special effort should be made to include minorities and women on the Personnel Relations staff.

(5) Minority and female employees should be made available for participation in Career Days, Youth Motivation Programs, and related activities in their communities.

(6) Active participation in "Job Fairs" is desirable. Company representatives who participating should be given authority to make on-the-spot commitments.

(7) Active recruiting programs should be carried out at secondary schools, junior colleges, and colleges with predominant minority or female enrollments.

(8) Recruiting efforts at all schools should incorporate special efforts to reach minorities and women.

(9) Special employment programs should be undertaken whenever possible. Some possible programs are:

(i) Technical and non-technical co-op programs with predominately Negro and women's colleges.

(ii) "After school" and/or work-study jobs for minority youths, male and females.

(iii) Summer jobs for underprivileged youth, male and female.

(iv) Summer work-study programs for male and female faculty members of the predominantly minority schools and colleges.

(v) Motivation, training and employment programs for the hard-core unemployed, male and female.

(10) When recruiting brochures pictorially present work situations, the minority and female members of the work force should be included, especially when such brochures are used in school and career programs.

(11) Help wanted advertising should be expanded to include the minority news media and women's interest media on a regular basis.

(12) The contractor should insure that minority and female employees are given equal opportunity for promotion. Suggestions for achieving this result include:

(1) Post or otherwise announce promotional opportunities.

(2) Make an inventory of current minority and female employees to determine academic, skill and experience level of individual employees.

(3) Institute necessary remedial, job training and work-study programs.

(4) Develop and implement formal employee evaluation programs.

(5) Make certain "worker specifications" have been validated on job performance related criteria. (Neither minority nor female employees should be required to possess higher qualifications than those of the lowest qualified incumbent.)

(6) When apparently qualified minority or female employees are passed over for upgrading, require supervisory personnel to submit written justification.

(7) Establish formal career counseling programs to include attitude development, education aid, job rotation, buddy system and similar programs.

(8) Review seniority practices and seniority clauses in union contracts to insure such practices or clauses are non-discriminatory and do not have a discriminatory effect.

(9) Make certain facilities and company-sponsored social and recreation activities are desegregated. Actively encourage all employees to participate.

(10) Encourage child care, housing and transportation programs appropriately designed to improve the employment opportunities for minorities and women.

§ 60-2.25 Internal audit and reporting systems.

(a) The contractor should monitor records of referrals, placements, transfers, promotion and terminations at all levels to insure nondiscriminatory policy is carried out.

(b) The contractor should require formal reports from unit managers on a schedule basis as to degree to which corporate or unit goals are attained and timeliness met.

(c) The contractor should review report results with all levels of management.

(d) The contractor should advise top management of program effectiveness and submit recommendations to improve unsatisfactory performance.

§ 60-2.26 Support of action programs.

(a) The contractor should appoint key members of management to serve on Merit Employment Councils, Community Relations Boards and similar organizations.

(b) The contractor should encourage minority and female employees to participate actively in National Alliance of Businessmen programs for youth motivation.

(c) The contractor should support Vocational Guidance Institutes, Vestibule Training Programs and similar activities.

(d) The contractor should assist secondary schools and colleges in programs designed to enable minority and female graduates of these institutions to compete in the open employment market on a more equitable basis.

(e) The contractor should publicize achievements of minority and female employees in local and minority news media.

(f) The contractor should support programs developed by such organizations as National Alliance of Businessmen, the Urban Coalition and other organizations concerned with employment opportunities for minorities or women.

Subpart D—Miscellaneous

§ 60-2.30 Use of goals.

The purpose of a contractor's establishment and use of goals is to insure that he meet his affirmative action obligation. It is not intended and should not be used to discriminate against any applicant or employee because of race, color, religion, sex, or national origin.

§ 60-2.31 Preemption.

To the extent that any State or local laws, regulations or ordinances, including those which grant special benefits to persons on account of sex, are in conflict with Executive Order 11246, as amended, or with the requirements of this part, we will regard them as preempted under the Executive order.

§ 60-2.32 Supersedeure.

All orders, instructions, regulations, and memoranda of the Secretary of Labor, other officials of the Department of Labor and contracting agencies are hereby superseded to the extent that they are inconsistent herewith, including a previous "Order No. 4" from this Office dated January 20, 1970. Nothing in this part is intended to amend 41 CFR 60-3 published in the Federal Register on October 2, 1971 or Employee Testing and Other Selection Procedures or 41 CFR 60-20 on Sex Discrimination Guidelines.

Effective date. This part shall become effective on the date of its publication in the FEDERAL REGISTER (12-4-71).

Signed at Washington, D.C., this 1st day of December 1971.

J. D. HORTON,
Secretary of Labor.

HORACE E. MESSING,
Acting Assistant Secretary
for Employment Standards.

JOHN L. WHITE,
Director, Office of
Federal Contract Compliance.

U. S. DEPARTMENT OF LABOR
OFFICE OF FEDERAL CONTRACT COMPLIANCE
WASHINGTON, D. C. 20210

REVISED
ORDER No.
14

CHAPTER 60 -- Office of Federal Contract Compliance,
Equal Employment Opportunity, Department of Labor

(Reprint from Federal Register, Vol. 38, No. 97 -- Monday, May 21, 1973)

Title 41--Public Contracts and Property
Management

CHAPTER 60--OFFICE OF FEDERAL CON-
TRACT COMPLIANCE, EQUAL EMPLOY-
MENT OPPORTUNITY, DEPARTMENT
OF LABOR

PART 60-60--CONTRACTOR EVALUATION
PROCEDURES FOR NONCONSTRUC-
TION CONTRACTORS

This part, known as "Revised Order No. 14," establishes standardized contractor evaluation procedures for the use of compliance agencies in their conduct of office and onsite compliance reviews of nonconstruction contractors subject to the equal employment opportunity requirements of 41 CFR 60-1.40 and 41 CFR pt. 60-2 (Revised Order No. 6) for the development of written affirmative action programs.

Revised Order No. 14 was issued to the compliance agencies and became effective on January 23, 1973. Revised Order No. 14 is hereby published as part 60-60.

While the comments and views of the compliance agencies regarding matters contained in Revised Order No. 14 were solicited and reviewed prior to its issuance, in accordance with the spirit of the public policy set forth in 5 U.S.C. 553, interested persons may submit written comments, suggestions, data or arguments to Mr. Philip J. Davis, Acting Director, Office of Federal Contract Compliance, U.S. Department of Labor, Washington, D.C. 20210, within 45 days of the publication of Revised Order No. 14 as set forth in this part 60-60. Material thus submitted will be evaluated and taken upon in the event amendments to this document were a proposal. Until such time as further changes are made, however, part 60-60 as contained herein shall remain in effect, thus insuring the public business to proceed more expeditiously.

A new part 60-60, effective as of January 23, 1973, is added to Title 41, Code of Federal Regulations, reading as follows:

Subject A--General

- 60-60.1 Purpose and scope.
- 60-60.2 Background.

Subject B--Procedures for Contractor
Evaluation

- 60-60.5 Agency actions.
- Subject C--Disclosure and Review of Contractor
Data
- 60-60.6 Confidential information.
 - 60-60.6 Employee interviews.
 - 60-60.6 Post review analysis.
 - 60-60.7 Contractor notification and concil-
iation.
 - 60-60.8 Time schedule for completion.
 - 60-60.9 Attachments.

Authority: Section 201, Executive Order 11246, 40 CFR 12019, and Executive Order 11246, 40 CFR 14000.

Subpart A—General

§ 60-60.1 Purpose and scope.

This part shall be known as "Revised Order No. 12" and is intended to establish standards for contractor evaluation procedures for compliance agencies.

§ 60-60.2 Background.

(a) For a prime contractor or subcontractor with 50 or more employees and a contract of \$50,000 or more is required to develop a written affirmative action program for each of its establishments (§ 60-140 of this chapter).

(b) The analysis must relate to all major job classifications at each facility to which the affirmative action program pertains, with explanations if minorities or women are currently being underutilized in any job classification (§ 60-211, 60-212 of this chapter).

(c) An acceptable affirmative action program must include an analysis of areas within which the contractor is deficient in the utilization of minority groups and women and, further, where deficiencies exist, goals and timetables to which the contractor's good faith efforts must be directed and, thus, to increase materially the utilization of minorities and women at all levels and in all segments of his work force (§ 60-210 of this chapter).

Subpart B—Procedure for Contractor Evaluation

§ 60-60.3 Agency actions.

(a) **Basic steps.**—A contractor evaluation should proceed in two basic steps:

(1) An onsite review of the contractor's affirmative action program and utilization analysis, using the enclosed contractor evaluation checklist (§ 60-60.6 (b)) as a worksheet; and (2) where necessary, an onsite discussion and review of those matters which are not fully or satisfactorily addressed in the affirmative action plan and utilization analysis using the enclosed onsite review guidelines (§ 60-60.8(c)) as a worksheet.

(b) **Affirmative action program and supporting documentation.**—Using approved methods of priority selection, compliance agencies shall routinely request from Federal contractors within their jurisdiction affirmative action programs including the required analysis grants including the required analysis grants including the required analysis grants and support data, as provided in the enclosed sample notification letter (§ 60-60.8(a)). Any other letter concerning compliance agency procedures under this part (Revised Order No. 12) may be

used. As used throughout this part, the term "Affirmative Action Plan (AAP)" and supporting documentation" includes:

(1) A copy of the contractor's last EEO report.

(2) The contractor's most recent workforce statistics available by major job classification and by sex and age.

(3) The contractor's statement of the inside and outside workable availability as outlined in § 60-211 of this chapter.

(4) Identification of areas of underutilization and establishment of goals and timetables to correct any deficiencies together with a plan of action to achieve such goals and timetables.

(5) Assessment of the contractor's current workforce to identify affected class situations and plans to correct such identified situations. (This may be submitted as part of the contractor's AAP or as a separate document. In either case, as discussed, it will be received in confidence by the compliance officer and returned to the contractor, without having been duplicated, at the conclusion of the review.)

(6) Information relative to:

(i) The reaffirmation of the contractor's EEO policy.

(ii) Examination and implementation of the policy.

(iii) A description of the contractor's internal audit reporting systems.

(iv) Substantiation of the compliance of the contractor's personnel policies and practices with the sex discrimination guidelines (pt. 60-20 of this chapter).

(v) Description of the contractor's support of community action programs.

(vi) Substantiation of the contractor's consideration of minorities and women not currently in the workforce having requisite skills.

(7) Summary data on applicant flow, hires, terminations, promotions, and training for the last 6 months or the last 100 applicants, hires, etc., whichever is less.

(c) **Off-site reviews.**—In any letter utilized to obtain data for off-site review, the compliance agency may only request the affirmative action program including the required analysis and support data. Contractors are free to respond to this according to their current procedures under Revised Order No. 4 (pt. 60-2 of this chapter). This first letter is not to contain a request for specific items or for formats unless the compliance officer affirmatively determines that a particular item is necessary for

this particular establishment. The off-site review must include part A of the contractor evaluation checklist (§ 60-60.6(b)). This checklist data must be provided to a complete summation of the acceptability of the contractor's AAP. The agency may complete part B of the contractor evaluation checklist (§ 60-60.6(b)) or (c) to have an onsite and for an onsite review where appropriate.

(1) If it is determined that the contractor's analysis is inadequate within the meaning of Executive Order 12248, as amended, and implementing rules, regulations and orders, the compliance officer shall notify the contractor of that fact and request appropriate additional information. If the contractor fails to meet this request within 30 days, a show cause notice will be issued. If the contractor fails to complete an adequate analysis, the enforcement procedures specified in OFCC order 4, (§ 60-2.2(c) of this chapter), shall be applicable.

(2) Such requests need not be limited only to those establishments already determined for a possible onsite investigation. Contractors who have reached agreement with their respective compliance agencies on nationwide AAP formats or on frequency of updating statistics may continue to do so, where onsite investigations are considered appropriate, a second letter advising the contractor of this judgment should be sent. They shall be conducted as soon as practicable at a time agreeable to the agency and the contractor, but no later than 45 days from the time of the request for the affirmative action plan and supporting data.

(3) After reviewing the affirmative action program and supporting data, the compliance agency will make a determination as to whether or not an onsite visit is appropriate. Section 60-60.8, attached hereto, affords guidance as to the methodology to be followed. After analysis of the affirmative action plan and supporting data and prior to the actual onsite visit, additional data necessary to complete the contractor's evaluation checklist (§ 60-60.6(b)) may be requested.

(4) Following receipt of the above information, data should be analyzed along with any files available relative to previous compliance reviews and complaint investigations. The appropriate office of the Equal Employment Opportunity Commission and State and city agencies should be consulted for the status of any current charges.

(6) To aid in the analysis, much material available and continuously being developed by the Bureau of the Census, Bureau of Labor Statistics, U.S. Printing and Engraving Service, Chamber of Commerce and many other resources which should be part of a reference library in all contract compliance offices.

(6) In the interests of an expeditious off-site review, the agency may limit its request to those parts of the contractor's AAP and supporting data necessary to complete part A of the contractor evaluation checklist. This consists of data absolutely essential to a determination of the acceptability of the contractor's AAP.

(7) If the agency desires to do a more thorough off-site review, it may also request the additional data necessary to complete part B of the contractor evaluation checklist or it may decide to leave such material to an onsite review where appropriate.

(8) If the contractor fails to provide the material requested within 30 days of the request, a show cause notice is to be issued and a determination of non-responsibility may be made by the contracting officer pursuant to § 60-2.2 of this chapter.

(9) If it is determined that the contractor's AAP and supporting data are insufficient to satisfactorily respond to the contractor evaluation checklist (either part A or B, or both), § 60-60.9 (b), the compliance officer shall notify the contractor of that fact and request such additional information as the compliance officer needs to complete the checklist. If the contractor fails to meet this request within 30 days, either then (1) because of a claim of confidentiality as discussed below, or (2) because the type or volume of data requested is best reviewed onsite, a show cause notice will be issued and a determination of non-responsibility may be made by the contracting officer.

(10) The failure to develop an acceptable affirmative action program as required in parts 60-1 and 60-5 of this chapter or the substantial deviation from a previously approved AAP constitutes the only grounds upon which a summary determination of non-responsibility may be made. See § 60-2.2 of this chapter, section 713 of title VII, as amended. Other allegations of non-compliance with Executive Order 11246 (as amended) and its implementing rules and regulations may give rise to the imposition of sanctions against a contractor only after the procedure in § 60-1.26 of this chapter have been followed.

(d) **Onsite reviews.**—Following an audit of the affirmative action plan and supporting documentation, the agency must make a determination as to whether or not an onsite review of the establishment is appropriate. If a decision is made to schedule an onsite review, a second letter advising the contractor of this judgment must be sent. (§ 60-60.9(e), letter ID). The onsite review shall be conducted as soon as practicable at a time agreeable to the agency and the contractor, but no later than 60 days from

the time of the request for the affirmative action plan and supporting data.

(1) If a decision is made not to schedule a review, the contractor must be so informed (1 day's notice). At the same time, the agency should also inform the contractor that its affirmative action plan has been found acceptable without the necessity for an onsite review. No other determination of compliance status can be made without the additional analysis and investigation of an onsite review. However, a onsite review conducted within the previous 12 months may serve as the basis for a compliance certification as set forth in § 60-1.20(d) of this chapter. Whenever possible, the compliance officer should then outline problems highlighted during the desk audit or state that no major problems were raised.

(2) If an onsite review is necessary, additional data keyed to the deficiencies observed in the contractor's AAP and the contractor evaluation checklist (§ 60-60.9(b)) will be needed during the onsite review process in order to make a determination of compliance with the Executive order.

(3) Each agency is authorized to request from specific contractors such advance information which could reasonably be supplied prior to the actual onsite visit. However, the contractor should be requested to furnish only the specific items of information which the compliance officer affirmatively determines are:

(i) Necessary for conducting the review and completing the standard compliance review report.

(ii) Not contained in the material submitted by the contractor;

(iii) Not available or able to be derived from other material submitted by the contractor.

(4) The items requested should provide the compliance officer with the information he or she needs for the review. However, no information may be requested unless the three criteria above are met. In some cases needed information is best made available on the site. In these cases, the contractor should be advised to have the information ready for the onsite review.

(5) This additional data should be such that could be adequately analyzed by the agency's office in order to expedite the onsite visit to the facility. In all cases, it and only if the issue addressed is one which is appropriate to the industry and contractor site being visited, the kind of data which is identified in the onsite review guidelines as being necessary for specific portions of the investigative process, must be requested and analyzed, either prior to the visit, or onsite if not supplied in the affirmative action program or available from other contractor supplied information. Certain data is noted in the onsite review guidelines § 60-60.9(e) as being necessary for proper analysis of specific issues. Where this decision is made to reserve the analysis of the data pending the onsite visit, the contractor should be informed reasonably ahead of the scheduled visit as to what information will be required during the review, so that

he may have the pertinent data available for the compliance officer at that time.

(6) In order to pursue certain issues uncovered in the compliance review, it may be necessary for the compliance officer to request certain additional information onsite even though such data have not been previously identified. Such additional information must also meet the above criteria.

(7) There is no specific format for the second letter, and the compliance officers may use any form which conforms to their particular needs and to the specific industry and contractor establishment being reviewed. In no case shall a determination of compliance status be made without an onsite visit.

Subpart C—Disclosure and Review of Contractor Data

§ 60-60.4 Confidential information.

(a) **Submission of and access to data.**—Confidential information such as lists of employees, employee names, pay data, reason for termination, may properly be excluded by the contractor from material submitted prior to an onsite visit if the contractor is concerned with the confidentiality of such data. In all cases, compliance officers must be permitted access to data needed to complete the onsite visit consistent with the onsite review guidelines (see § 60-3(d) of this chapter).

(b) **Review and disclosure of data.**—Review and disclosure of data should be governed by three basic principles:

(1) The contractor must provide full access to data onsite, as required by § 60-1.43 of this chapter, unless he shows that data sought to be reviewed is not pertinent to compliance with the Executive order.

(2) Only summary data of a non-sensitive nature should be provided for review onsite, unless the agency is able to show after onsite review that it requires further detailed data offsite in order to conduct an effective review, or for purposes of enforcement.

(3) Contractor data which is particularly sensitive (names, rates of pay, reasons for termination, etc.) should be limited to onsite review.

(c) **Removal of data.**—Whenever it is determined that detailed data is to be taken offsite, the contractor may protect the confidentiality of such data as follows:

(1) The contractor and the agency may agree that the data is to be considered on loan to the compliance agency for purposes of the review and the data is not to be considered in the custody of the agency.

(2) The data shall be returned to the contractor whenever the agency concludes that the contractor is in compliance or the enforcement procedure concludes.

(d) **Dispute resolution.**—Disputes between the agency and the contractor over the right of access to data, the extent of data to be provided offsite, or the treatment of company sensitive data should be referred to the Office of the

Director of the Department of Labor for a ruling.

(c) **Corrective action programs.**—Corrective action programs developed by contractors should be approved by the contractor immediately upon completion of the program. If not immediately approved or prepared as part of an affirmative action program, shall remain the sole property of the contractor while the contractor is under the agency on or off premises for review. Such programs should not be cancelled by the agency and shall be returned intact to the contractor immediately following but not until a determination that they are no longer necessary in connection with a review of the contractor's EEO posture. Contractors should be told that the contents of their corrective action program will be regarded at all times as having been received in confidence and its contents shall not be disclosed except as required during proceedings instituted pursuant to OFCC regulations § 60-123 of this chapter.

(f) **Examination and copying of documents.**—Nothing contained herein is intended to supersede or otherwise limit the provisions contained in part 60-20 of this chapter for public access to information from records of the OFCC or its various compliance agencies.

§ 60-60.5 Employee interviews.

The compliance officer may request, where appropriate, that the contractor make available a reasonable number of selected minority or women employees for interviews to assist in a determination of whether employees are being fairly treated by the contractor or whether such employees believe they are being or have been unlawfully discriminated against in initial placement, subsequent upgrade or promotion, or other terms and conditions of employment. The number, scope, and manner of conducting such interviews should be discussed in advance with the contractor. If the contractor appears reluctant to interview on the job, or for other reasons, the compliance officer should conduct such interviews off the premises.

§ 60-60.6 Post review analysis.

(a) **Summary of deficiencies.**—Subsequent to the completion of the review the compliance officer shall:

- (1) List deficiencies if any noted in the previous onsite review and any corrective action that have ensued.
- (2) List any general deficiencies of the contractor's affirmative action program.
- (3) List current specific deficiencies if any as determined through the onsite review.

(b) **Discussion of remedies.**—Deficiencies requiring more than obvious simple corrective actions should be discussed with the contractor. For example, matters affecting any relief required for victims of discrimination, etc., equality system modifications where appropriate, etc.; should be carefully reviewed with the contractor and reduced to writing.

§ 60-60.7 Contractor notification and conciliation.

(a) Upon completion of the onsite review, the compliance officer should sched-

ule an exit conference with contractor officials to review, to the extent possible, the findings from the review. Unless the review is a "no finding" or "few findings" and unless the contractor has requested, an exit conference should not try to itemize all deficiencies until the postreview analysis is completed. Upon completion of the postreview analysis, the findings of the review and the list of deficiencies or recommendations shall be submitted to the contractor in writing and if practicable, delivered in person to lay the foundation for any necessary conciliation of efforts. Should the contractor disagree with the findings of the review or feel that he is unable to comply, he may request a conciliation meeting which shall be scheduled by the agency as soon as practical, but may not be used to delay enforcement of the Executive order.

(b) The contractor may at any time avail himself of the provisions of § 60-123(c) (5) of this chapter which provides as follows:

When a prime contractor or subcontractor, without a hearing, shall have complied with the recommendations or orders of an agency or the Director and believes such recommendations or orders to be erroneous, he shall, upon receipt of a written order within 10 days of such compliance, be allowed an opportunity for a hearing and review of the alleged erroneous action by the agency or the Director.

§ 60-60.8 Time schedule for completion.

(a) Within 45 days from the date of the actual initiation of the onsite investigation, if one is conducted, or any extension of such period granted by the compliance agency for good cause, including an opportunity for the contractor

to avail himself of conciliation as above, the contractor must either be found in compliance by the compliance agency, and not have been so notified of that fact by the agency, or must have been issued a 30-day show cause notice as required under the rules and regulations pursuant to the Executive order.

(b) During this period, the compliance agency is obligated to:

- (1) Complete the onsite review.
- (2) Notify the contractor of any deficiencies found or recommendations (see above).
- (3) Undertake any initial conciliation or clarification discussions with the contractor that may be appropriate.
- (4) Notify the contractor of compliance or issue a 30-day show cause order.
- (5) Complete and forward the coding sheet to OFCC.

(c) A contractor's affirmative action plan may be accepted only after the coding sheet has been forwarded to OFCC.

(d) Before each onsite compliance review the compliance officer will complete the coding sheet as indicated. During and after the onsite visit the remainder of the coding sheet will be completed. All completed coding sheets will be forwarded to the Director, OFCC. No compliance review can be considered complete until the coding sheet is forwarded to OFCC, and monthly reports to OFCC will reflect that fact. In addition, all coding sheets are to be forwarded to OFCC within 45 days after an onsite visit.

(e) A contractor's affirmative action plan may be accepted only after the coding sheet has been forwarded to OFCC.

(f) Before each onsite compliance review the compliance officer will complete the coding sheet as indicated. During and after the onsite visit the remainder of the coding sheet will be completed. All completed coding sheets will be forwarded to the Director, OFCC. No compliance review can be considered complete until the coding sheet is forwarded to OFCC, and monthly reports to OFCC will reflect that fact. In addition, all coding sheets are to be forwarded to OFCC within 45 days after an onsite visit.

§ 60-60.9 Attachments.

The following forms are set out in full as they give detailed information as to our procedures and requirements of value to contractors.

SAMPLE LETTER—NOTIFICATION OF COMPLIANCE AUDIT

DEAR CONTRACTOR: Your facility located at _____ has been selected for a desk audit regarding the requirements of Executive Order 11945, as amended, and OFCC Regulations 41 CFR parts 60-1 and 60-2. This review will consist of an onsite review of your affirmative action program (AAP) and the supporting data described below as required pursuant to OFCC Order No. 4, 41 CFR part 60-2.

Following this audit, it may be necessary to request additional data from your office and/or to schedule your facility for an onsite compliance review. If it is determined that an onsite review is necessary, you will be contacted as soon as practicable, but no later than 45 days from our receipt of your AAP as to the substance of the review and to schedule a mutually acceptable time for such review. If it is determined that your AAP is acceptable, you will be notified within 45 days of our receipt of your AAP.

Contents of an acceptable affirmative action program and supporting data are outlined in 41 CFR 60-211, 60-212 and 60-213 and should include:

1. A copy of your last EEO-1 report.
2. Your most recent workforce statistics available by major job classification and by race and sex.
3. The evaluation of the inside and outside workforce availability as outlined in 60-211.
4. Identification of areas of underutilization and establishment of goals and timetables to correct any deficiencies together with a plan of action to achieve these goals and timetables.

5. Assessment of your current workforce to identify affected class situations and plans to correct these identified situations. (This may be submitted as part of your AAP or as a separate document. In either case, it will be reviewed in confidence and will be returned to you, without having been duplicated, at the conclusion of the review.)

6. Summary data on applicant flow, hires, terminations, promotions, and training, must be provided for the last 6 months or the last 10 applicants, hires, etc., whichever is less.

7. Information relative to:
 - The restoration of your EEO policy.
 - How you disseminate and implement the policy.
 - The description of your internal audit and reporting systems.

Question 7 is optional, to be used if compliance agency needs data to complete pt. 3 of the Contractor Evaluation checklist.

- Substantiation of the compliance of your personnel policies and practices with the Sex Discrimination Guidelines (41 CFR 60-20).
 - Description of your support of community action programs.
 - Substantiation of your consideration of minorities and women not currently in the workforce having requisite skills, e.g., communications with known source of referral for minorities and women.
- Please submit the foregoing data to _____ within 30 days of the date of this letter. Failure to comply with this request will result in the issuance of a show cause letter pursuant to 41 CFR 60-123 and may also give rise to a determination of non-compliance pursuant to 41 CFR 60-22. If there are any questions relative to this matter, you may contact _____ telephone number _____

(Agency representative)

CONTRACTOR EVALUATION CHECKLIST
 (Circle Review—AAP and Supporting Data)
 Name of Contractor.....
 Address of Contractor.....
 Data Letter First Requesting AAP.....
 Date Report of AAP.....
 Type of Review (Preaward, Post Award, Follow-Up Complaint).....
 Name and Telephone Number of Contractor
 FO Officer.....

PART A—EMPLOYMENT DATA

A. Section 60-211, Required utilization analysis.

The requirements of 60-211 are as follows:

(a) An analysis of all major job classifications at the facility, with explanation if minorities or women are currently being underutilized in any one or more job classifications (job "classification" herein meaning one or a group of jobs having similar content, wage rates and opportunities). Underutilization is defined as having lower utilization than would reasonably be expected by their availability. In making the work force analysis, the contractor shall conduct such analysis separately for minorities and women.

(b) In determining whether minorities are being underutilized in any job classification the contractor will consider at least all of the following factors:

- (1) The minority population of the labor area surrounding the facility;
- (2) The size of the minority unemployment force in the labor area surrounding the facility;
- (3) The percentage of the minority work force as compared with the total work force in the immediate labor area;
- (4) The general availability of minority

having requisite skills in the immediate labor area;

(2) The availability of minorities having requisite skills in an area in which the contractor can reasonably recruit;

(3) The availability of promotable and transferable minorities within the contractor's organization;

(4) The existence of training institutions capable of training persons in the requisite skills; and

(5) The degree of training which the contractor is reasonably able to undertake as a means of making all job classes available to minorities.

(b) In determining whether women are being underutilized in any job classification, the contractor will consider at least all of the following factors:

(1) The size of the female unemployment force in the labor area surrounding the facility;

(2) The percentage of the female work force as compared with the total work force in the immediate labor area;

(3) The general availability of women having requisite skills in the immediate labor area;

(4) The availability of women having requisite skills in an area in which the contractor can reasonably recruit;

(5) The availability of women seeking employment in the labor or recruitment area of the contractor;

(6) The availability of promotable and transferable female employees within the contractor's organization;

(7) The existence of training institutions capable of training persons in the requisite skills; and

(8) The degree of training which the contractor is reasonably able to undertake as a means of making all job classes available to women.

	Yes	No	Unknown
1. Is there a utilization analysis for minorities?			
2. Does it consider the points stipulated in 60-211(b)(1)?			
3. Describe any deficiencies with the analysis.			

If question is not applicable to the contractor, rate N/A.
 If more information is needed to complete this checklist is desirable, use this column.

The compliance officer should use a narrative in addition to this checklist approach whenever necessary to adequately respond to the following inquiries.

	Yes	No	Unknown
2. A. Is there a utilization analysis for women?			
B. Does it consider the points stipulated in 60-211(b)(2)?			
C. Describe any deficiencies with the analysis.			

B. Section 60-212, Establishment of goals and timetables.

	Yes	No	Unknown
1. Are the goals the contractor has set significant and attainable?			
2. Will the contractor's goals be attainable for minorities and women in the short term?			
3. Are the goals set for all minorities and women in the short term?			
4. Has the contractor established all steps necessary to attain the goal setting process?			
5. Has the contractor established the expansion, contraction and turnover of the work force in developing its goals and timetables?			
6. If the contractor has not established a goal, describe AAP analysis the factors in 60-211.			

C. Section 60-223, Identification of problem areas.

1. Complete the following:
 - a. Describe the goal setting method used by contractor.
 - b. Describe the contractor's degree of attainment of his current affirmative action plan goals and note any problems.
2. Complete table Q of the coding sheet. If an onsite review is to be conducted, table Q may be left until the onsite review, but suitable worksheets should now be developed.

Listing of major job classifications	AAP goal	End of last period	Current	Percent of goal attainment
Operational manager.....				
Professional.....				
Technical.....				
Skilled.....				
On-the-job.....				
Operator.....				
Laborer.....				
Service.....				
Total.....				

† These would be subdivided into groupings of common job classifications, earnings ranges or common skill groups for each category.

c. Female representation table (express as percentages).

Listing of major job classifications	AAP goal	End of last period	Current	Percent of goal attainment
Office Management				
Professional				
Technical				
Skilled				
Operational				
Construction				
Operative				
Laborer				
Service worker				
Unskilled				

1. These would be subdivided into groupings of common job classifications, earnings ranges or common skill groups for each category.

Yes No Unknown

2. What is the percent of minority applicants?
3. What is the availability of minorities in the local work force expressed as a percentage of the local work force?
4. What is the percent of female applicants?
5. What is the availability of women in the local work force expressed as a percentage of the local work force?
6. Are there written job descriptions?
7. Does your review of the application form indicate any problems? Please explain.
8. Have all tests that we will be validated to the extent required by the EEOC - except CT -
9. a. What percent of tests by major job classification have been minority?
 - b. What percent of tests by major job classification have been women?
10. a. What percent of tests by major job classification have been women?
 - b. Is this irrespective of the minimum condition for unskilled or skilled?
11. What percent of total promotions have been minority?
12. Is this equal to or greater than the percent of the minority represented in the minority labor force?
13. What percent of total promotions have been women?
14. Is this equal to or greater than the percent of the female representation on the entire labor force?
15. Are there inhibiting factors to equal opportunity for minorities in the transfer? Please explain.
16. Are there inhibiting factors to equal opportunity for women in the transfer? Please explain.
17. Does it appear that facility and company sponsored events are open to all and not restricted by race?
18. Are there any inhibiting factors to equal opportunity in the security practices of the company? Please explain.
19. Are any ethnic groups significantly underrepresented in apprenticeship or other training programs? Please explain.

- | | Yes | No | Unknown |
|--|-----|----|---------|
| 20. Are women significantly underrepresented in apprenticeship or other training programs? Please explain. | | | |
| 21. Does the company focus on issues affecting minorities and women as set forth in § 60-21, i.e., a policy, child care, transportation, etc., as they impact recruiting/employment? Please explain. | | | |

D. Section 60-21, Corrective Action Programs

1. Has the contractor developed a corrective action program to the extent required by Section A?
2. Was this included as part of the contractor's AAP or a separate program? Would it be the contractor suggested for members of an identified affected class?

PART B-ADDITIONAL DATA

Yes No Unknown

A. Section 60-22, Development or Reaffirmation of Policy

1. Does the contractor's AAP include an EEO policy statement or reaffirmation document?
2. Does the policy statement address those items noted in 60-22, paragraphs 1 through 4 in their entirety?
 - a. If no, in what respects is the statement deficient?

B. Section 60-22, Discrimination of the Policy

1. Has the contractor provided substantiation of the policy statement in the contractor's policy manual?
2. Has the contractor provided substantiation that the contractor's manual has been distributed to the contractor's employees through some means of the contractor's communication system?
3. Has the contractor provided substantiation that employees have attended monthly orientation to the requirements of § 60-21?
4. Has the contractor provided substantiation that EEO is covered in new employee orientation and management training?
5. Has the contractor provided substantiation that union officials have been informed of the policy?
6. Are there nondiscrimination clauses in all union contracts?
7. Have there been articles published on EEO programs, program reports, etc.?
8. If employees are featured in in-house or product advertisements, do they show minorities and women?
9. Is there evidence of communication to employees concerning the contractor's AAP?
10. Have all recruiting sources the contractor uses been informed verbally and in writing of company policy?
11. Is the EEO clause incorporated in the contractor's purchase order organization in all contracts awarded by the contractor?
12. Has the contractor provided substantiation that it is notifying minority female organizations in writing of the company policy?
13. Is there evidence that the contractor communicates to prospective employees?
14. Are minority and female employees shown equipment or help wanted advertising?
15. Has the contractor provided substantiation that it notifies subcontractor, vendor and suppliers of company EEO policy?

RULES AND REGULATIONS

C. Section 60-2.2, Responsibility for Implementation

Yes No Unknown

1. Is there evidence that an executive has been appointed as director or manager of the company EEO program?
2. Is there a description of the executive's responsibilities?
3. Does it include those elements as set forth in paragraph (A)?
4. Is there a description of how management responsibility is shared?
5. Does the management identify problem areas and establish local goals and objectives?
6. Is local management active in minority and female organizations and community programs?
7. Does local management conduct periodic audits of minority, female, and handicapped employees?
8. Does the local management identify and report to the contractor any other management areas that the policy is being violated?
9. Does management give or solicit contributions to minority and women employee groups full opportunities for transfer and promotion?
10. Does management make available for all employees:
 - a. Equal opportunity and affirmative action training?
 - b. Facilities as designated, minority and female employees are employed?
 - c. Equal opportunity and affirmative action training and recreational activities?

D. Section 60-2.3, Development and Execution of Programs

1. Is there evidence that the contractor reviews position descriptions?
2. Are position descriptions available to all members of management?
3. Are recruiters trained in EEO?
4. Is there evidence of an active involvement with minority organizations?
5. Is there evidence of an active involvement with female organizations?
6. Do minority and female employees refer applicants?
7. Are there recruitment and hiring procedures for the contractor's staff?
8. Are there recruitment and hiring procedures for the contractor's staff?
9. Are there recruitment and hiring procedures for the contractor's staff?
10. Are there recruitment and hiring procedures for the contractor's staff?
11. Are there recruitment and hiring procedures for the contractor's staff?
12. Are there recruitment and hiring procedures for the contractor's staff?
13. Are there recruitment and hiring procedures for the contractor's staff?
14. Is the percent of females hired for females higher than for males?
15. Does explain.

E. Section 60-2.24, Internal Audit and Reporting System

1. Is there evidence that the contractor monitors its affirmative action program?
2. Does the contractor require formal reports from managers on the accomplishment of goals?
3. Is top management aware of the progress of the EEO program?

F. Section 60-2.26, Support of Action Programs

1. Is the contractor management involved in external affirmative action programs?
2. Are support organizations available to the contractor's organization?
3. Does the contractor support outside training programs for minorities and females?
4. Does the contractor support schools in order to train minorities and females?
5. Does the contractor publish EEO achievements?
6. Does the contractor support organizations such as NAB, etc.?

G. Section 60-2.12, Additional Ingredients of AAP

Yes No Unknown

1. Has the contractor provided evidence to support the fact that the contractor is in compliance with the set discrimination guidelines (41 CFR pt. 60-2.1)?
 2. Is there evidence that the contractor is conducting minorities and women not in the work force?
- Explain contractor's performance against previous goals:

NOTE.—Certain items in 100-2.04 are omitted as they are most appropriate for onsite review. None is done.

(C) ONSITE REVIEW GUIDELINES

Yes No

- A. EEO policies and procedures:
 1. Are EEO policies prominently displayed?
 2. What EEO policy statements are posted? Please explain.
3. Have the lower level supervisors received and disseminated the policy? Please explain.
4. Is EEO part of the orientation for new employees and are these policies included in the orientation of the subject? Please explain.
5. What role do the supervisors play in dissemination of policy? Please explain.
6. How much time does he spend in EEO work? (Percent)
7. Has management expressed any intention in writing or otherwise to take disciplinary action if failure to adhere to EEO policies and procedures? Please explain.
8. Are supervisors held accountable for failure to meet EEO goals?

B. Workforce analysis.

If an adequate workforce analysis was not furnished during the onsite review, the compliance officer should set to see, if available, the employer's representation report of his workforce analysis. This facility workforce (total, male, female, and male and female for each minority group comprising 2 percent or more of the labor force) by department or more of the labor force) by department or organization (i.e., a logical cohesive group such as personnel, manufacturing, finance, etc.) and by EEO-1 category within organization subdivided into (perhaps common) job groupings within an EEO-1 category. These job groupings should reflect one or more jobs having similar content, wage rates and opportunities. The job groupings should be ranked appropriately by skill or earnings or line of progression, or existing administrative practice. If earnings are used, the range of annual earnings for each grouping should be given. However, for the purpose of these guidelines and in all cases where pay is used, alphabetic or numeric coding or the use of an index of pay and pay range is acceptable and should be used when contractors are concerned about confidentiality of salary information.

C. Recruitment, hiring, selection and placement.

(a) If adequate applicant flow data was not furnished during the onsite review, the compliance officer should set to see the contractor's applicant flow report summarizing total applicants by total, male, female, and male and female minority classifications. Where in many cases applicants are not classified by particular job, it should be possible to provide some separation of the applicant flow count into at least broad occupation groups. An applicant is defined as one who has applied for permanent employment and has complied with the contractor's formal application procedure. Next the report should show the number of offers of employment for each category and by total, male, female and male and female minority classifications. The report should show acceptance of offers for each category and by total, male, female and male and female minority classifications. The acceptances should also be related to the job groupings outlined in section B. Workforce Analysis. This report should reflect applicant activity for the last 6 months or the last 100 acceptances, whichever is less.

resulting in movement to a position of greater skill, effort or responsibility. Wage increases alone do not determine a promotion.

(c) A determination should be made if there is a disparity between the promotion rate of minorities and women as related to the rate for communities and/or males. In doing this analysis, the following procedure should be included:

Identify the various entry level positions and the promotional ladders as indicated by the contractor and by the OCO's confirmation through sample record analysis. Are there lines in any way oriented by race or sex? Please explain. With regard to promotions that are competitive, what is the significance of minority, ability and seniority in promotion and transfer considerations? Please explain. Are there any periodic written performance ratings which influence promotion or transfer? Are minority or women concentrated in certain jobs outside any line of promotion or which tend and before the employee can reach the pay grade to which their experience, training or seniority might entitle them? Please explain. Is there a well-structured transfer program? Discuss any lack of representation of minorities and women in this program. Please explain.

(d) Review the file on transfer requests to determine if minorities or women have been overlooked or rejected disproportionately. Please summarize your findings. What is the frequency of inter- or intra-departmental transfer for better working conditions or to gain promotional opportunities? Is counseling offered to employees considering this move? How common is transfer from blue collar to white collar positions or from "traditionally female" or minority to "traditionally male" or predominantly white jobs or vice versa? Who monitors promotion and transfer activity and through what means? How is job security affected by transfer or promotion and does this disproportionately affect minorities or women?

(e) Comment on the representation of minorities and women among supervisors and wage administrators during the previous year suggest any improvement. If appropriate, review selected personnel records to conduct the following analysis. Explain how supervisors are selected. Who monitors these activities? Explain how supervisory ability is measured.

F. Wage and salary analysis—Review and compare wages and salaries of a sampling of minorities and women within selected job classifications. Are there positions with similar duties but with different rates of pay which seem to be related to the sex or race of the employee? Please explain. What is the contractor's explanation for these discrepancies? Please explain. Are there general salary ranges for jobs or specific rates at which everyone begins? Please explain. Do minority and women who start at lower rates tend to remain at lower rates? Please explain. What is the contractor's explanation for this? Please explain. Who makes the determination as to what those starting rates will be? Please explain. Are the rates negotiable? Are minorities or women assigned to jobs where incentive earnings are more difficult? Please explain. Does review of any employee's records confirm or dispute the relationship of education, training and experience to pay? Please explain. Are minorities and women superstiting integrated groups? Are women supervisors generally at a lower plateau in the organization? Where minorities and women have been newly installed as supervisors, has there been any negative reaction from the workforce and how has management dealt with it? Please explain. Is there a supervisory development program? Please explain.

G. Training and educational opportunities—(a) If adequate data on training and educational opportunities was not furnished during the on-site review, the compliance officer should ask to see, if available, the employer's report on training at the facility, summarizing by training class the participation by total, male, female and male and female minority classifications and showing the training participation rate for each group. The report should reflect the last 6 months activity.

(b) If such a report is not available, the compliance officer should obtain from the contractor a list of various training and apprenticeship programs ongoing or completed during the last 6 months or other significant period of time, with names of other identification, minority group identification, sex of participants, date of completion and job and pay before and after training. Include employees hired directly into such programs.

(c) What types of training do new employees receive? How are additional opportunities for training and education advertised? Is there evidence of any disparate failure or dropout rate? If there is a registered apprenticeship program, has the contractor provided the Bureau of Apprenticeship and Training with an acceptable affirmative action program with goals and timetables? Is formal training being required now for jobs not previously involved?

Is this discriminatory? Does the contractor publicize EO achievements? Does the contractor support organizations which would assist his efforts and implement his affirmative action program?

H. EO-112, additional ingredients of AAP.—Has the contractor provided evidence to support the fact that the contractor is abiding by the sex discrimination guidelines (41 CFR pt. 60-25)? Is there evidence that the contractor is considering minorities and women not in the work force?

(d) SAMPLE LETTER TO THE CONTRACTOR I

SAISFACTORY REVIEW

I have reviewed your affirmative action plan and supporting documentation submitted to this office on As a result of that review, I find your AAP acceptable and I will not be visiting your site for a more intensive review.

My evaluation of your AAP did, however, point out that you should be making a more concerted effort in I would hope to see improvement in these areas during my next review. I

I appreciate your cooperation in this matter.

(Signature)

*Optional.

(e) SAMPLE LETTER TO THE CONTRACTOR II

UNSAISFACTORY REVIEW

I have reviewed your AAP, submitted to this office on As a result of the review on the material submitted, I cannot fully determine your compliance with the requirements of revised order No. 4. I would, therefore, like to schedule an on-site review on I would appreciate your having data available to review the following areas:

If you have any questions relative to the above, please contact me.

(Signature)

Signed at Washington, D.C., this 11th day of May 1973.

PETER J. BARNETT,
Secretary of Labor.

PHILIP J. DAVIS,
Acting Director, Office of
Federal Contract Compliance.

[FD-302 (Rev. 5-18-73), 8:45 am]

12851

FINES AND REGULATIONS

The following checklist, issued as Attachment A to Order No. 14 (Revised) (See 401:151), was designed by the Office of Federal Contract Compliance for use by compliance officers in making an offsite review of a nonconstruction contractor's experiences under his Affirmative Action Plan.

CONTRACTOR EVALUATION CHECKLIST

(Off-site Review—AAP and Supporting Data)

Name of Contractor

Address of Contractor

Date of Letter Sent Requesting AAP

Date Receipt of AAP

Type of Review (Pre-Award, Post Award, Follow-up Complaint)

Name and Telephone Number of Contractor EO Officer

Part A—Essential Data

A. Section 60-2.11, Required Utilization Analysis

The requirements of Section 60-2.11 are as follows:

(a) An analysis of all major job classifications at the facility, with explanation if minorities or women are currently being underutilized in any one or more job classifications (job "classification" herein meaning one or a group of jobs having similar content, wage rates and opportunities). "Underutilization" is defined as having fewer minorities or women in a particular job classification than would reasonably be expected by their availability. In making the work force analysis, the contractor shall conduct such analysis separately for minorities and women.

(1) In determining whether minorities are being underutilized in any job classification the contractor will consider at least all of the following factors:

- (i) The minority population of the labor area surrounding the facility;
- (ii) The size of the minority unemployment force in the labor area surrounding the facility;
- (iii) The percentage of the minority work force as compared with the total work force in the immediate labor area;
- (iv) The general availability of minorities having requisite skills in the immediate labor area;

(v) The availability of minorities having requisite skills in an area in which the contractor can reasonably recruit;

(vi) The availability of promotable and transferable minorities within the contractor's organization;

(vii) The existence of training institutions capable of training persons in the requisite skills; and

(viii) The degree of training which the contractor is reasonably able to undertake as a means of making all job classes available to minorities.

(2) In determining whether women are being underutilized in any job classification, the contractor will consider at least all of the following factors:

(i) The size of the female unemployment force in the labor area surrounding the facility;

(ii) The percentage of the female work force as compared with the total work force in the immediate labor area;

(iii) The general availability of women having requisite skills in the immediate labor area;

(iv) The availability of women having requisite skills in an area in which the contractor can reasonably recruit;

(v) The availability of women seeking employment in the labor or recruitment area of the contractor;

(vi) The availability of promotable and transferable female employees within the contractor's organization;

(vii) The existence of training institutions capable of training persons in the requisite skills; and

(viii) The degree of training which the contractor is reasonably able to undertake as a means of making all job classes available to women.

Yes* No Unknown**

1. a. Is there a utilization analysis for minorities? _ _ _

b. Does it consider the points itemized in Section 60-2.11(a) (1)? _ _ _

c. Describe any deficiencies with the analysis _ _ _

The Compliance Office should use a narrative in addition to this checklist approach whenever necessary to adequately respond to the following inquiries.

2. a. Is there a utilization analysis for women? _ _ _

b. Does it consider the points itemized in Section 60-2.11 (a) (2)? _ _ _

c. Describe any deficiencies with the analysis _ _ _

*If question is not applicable to the contractor, note N/A

**Where information needed to complete this checklist is unavailable, use this column

B. Section 60-2.12, Establishment of Goals and Timetables

Yes No Unknown

- 1. Are the goals the contractor has set significant and attainable? _____
- 2. Will the goals correct deficiencies? _____
- 3. Are these separate goals and timetables for minorities and women to the extent required by Section 60-2.10? _____
- 4. Has the contractor provided all evidence requested to demonstrate that all levels of management have been involved in the goal setting process? _____
- 5. Has the contractor considered the expansion, contraction and turnover of the work force in developing its goals and timetables?.... _____
- 6. If the contractor has not established a goal, does his AAP analyze the factors in Section 60-2.11? _____

C. Section 60-2.23, Identification of Problem Areas

1. Complete the following:

- a. Describe goal setting method used by contractor.
- b. Review the contractor's degree of attainment of his current affirmative action plan goals and note any problems.
- c. Complete Table Q of the Coding Sheet. If an on-site review is to be conducted, Table Q may be left until the on-site review, but suitable worksheets should now be developed.

- 2. What is the percent of minority applicants? _____
- 3. What is the availability of minorities in the local work force expressed as a percentage of the local work force? _____
- 4. What is the percent of female applicants? _____
- 5. What is the availability of women in the local work force expressed as a percentage? _____
- 6. Are there written job descriptions? _____
- 7. Does your review of the application form indicate any problem? ... _____
- Please explain _____

- 8. Have all tests that are used been validated to the extent required by the OFCC Testing Order? _____
- 9. a. What percent of hires by major job classification have been minority? _____
- b. Is this improving the utilization condition for underutilized areas? _____
- 10. a. What percent of hires by major job classification have been women? _____
- b. Is this improving the utilization condition for underutilized areas? _____
- 11. What percent of total promotions have been minority? _____
- 12. Is this equal to or greater than the percent of the minority representation in the contractor's work force? _____

d. Minority Representation Table (express as percentage)

Listing of Major* Job Classifications	AAP Goal	End of Last Period	Current	Percent of Goal Attain.
Official/Manager	_____	_____	_____	_____
Professional	_____	_____	_____	_____
Technician	_____	_____	_____	_____
Sales Worker	_____	_____	_____	_____
Office/Clerical	_____	_____	_____	_____
Craftsman	_____	_____	_____	_____
Operative	_____	_____	_____	_____
Laborer	_____	_____	_____	_____
Service Worker	_____	_____	_____	_____
Total	_____	_____	_____	_____

*These would be subdivided into groupings of common job classifications, earnings ranges or common skill groups for each category.

e. Female Representation Table (express as percentages)

Listing of Major* Job Classifications	AAP Goal	End of Last Period	Current	Percent of Goal Attain.
Official/Manager	_____	_____	_____	_____
Professional	_____	_____	_____	_____
Technician	_____	_____	_____	_____
Sales Worker	_____	_____	_____	_____
Office/Clerical	_____	_____	_____	_____
Craftsman	_____	_____	_____	_____
Operative	_____	_____	_____	_____
Laborer	_____	_____	_____	_____
Service Worker	_____	_____	_____	_____
Total	_____	_____	_____	_____

*These would be subdivided into groupings of common job classifications, earnings ranges or common skill groups for each category.

Yes No Unknown

13. What percent of total promotions have been women?

____ _

14. Is this equal to or greater than the percent of the female representation on the contractor's work force?

____ _

15. a. Are there inhibiting factors to equal opportunity for minorities in the transfer system?

____ _

b. Please explain:

____ _

16. a. Are there inhibiting factors to equal opportunity for women in the transfer system?

____ _

b. Please explain:

____ _

17. Does it appear that the facility and company sponsored events are open to all and participated in by all?

____ _

18. a. Are there inhibiting factors to equal opportunity in the seniority practices of the company?

____ _

b. Please explain:

____ _

19. Are minorities significantly underrepresented in apprenticeship or other training programs?

____ _

Please explain:

____ _

20. Are women significantly underrepresented in apprenticeship or other training programs?
Please explain

21. Does the company focus on issues affecting minorities and women as set forth in Section 60-2.23 and does it address steps to meet such as those suggested in Section 60-2.24; i.e., housing, child care, transportation, etc., as they impact recruiting/employment?
Please explain

D. Section 60-2.1, Corrective Action Programs

1. Has the contractor developed a corrective action program to the extent required by Section 60-2.1?

2. Was this included as part of the contractor's AAP or a separate program?

What relief has the contractor suggested for members of an identified affected class?

Part B — Additional Data

A. Section 60-2.20, Development or Reaffirmation of Policy

1. Does the contractor's AAP include an EEO policy statement or reaffirmation thereof?

2. Does the Policy Statement address those items noted in 00.2.20, paragraphs 1 through 4 in their entirety?

a. If no, in what respects is the statement deficient

B. Section 60-2.21, Dissemination of the Policy

1. Has the contractor provided substantiation of the Policy Statement in the contractor's policy manual?

2. Are there examples of it being publicized in company publications?

3. Has the contractor provided substantiation that management meetings have been held relative to the requirements of Sec. 60-2.21? ...

4. Has the contractor provided substantiation that employees have attended meetings relative to the requirements of Sec. 60-2.21?

5. Has the contractor provided substantiation that EO is covered in new employee orientation and management training?

6. Has the contractor provided substantiation that union officials have been informed of the policy?

7. Are there nondiscrimination clauses in all union contracts? ...

8. Have there been articles published on EO programs, progress reports, etc.?

9. If employees are featured in image or product advertisements, do they show minorities and women?

10. Is there evidence of communications to employees concerning the contractor's AAP? _____

11. Have all recruiting sources the contractor uses been informed verbally and in writing of company policy? _____

12. Is the EO Clause incorporated in the contractor's Purchase Order? _____

13. Has the contractor provided substantiation that it is notifying minority/female organization in writing of the company policy? _____

14. Is there evidence that the contractor communicates to prospective employees the existence of the AAP? _____

15. Are minority and female employees shown in consumer or help wanted advertising? _____

16. Has the contractor provided substantiation that it notifies sub-contractor, vendor and suppliers of company EO policy? _____

C. Section 60-2.22, Responsibility for Implementation

1. Is there evidence that an executive has been appointed as director or manager of the Company EO program? _____

2. a. Is there a description of the executive responsibilities? ... _____

b. Does it include those elements as noted in Section 60-2.22, paragraph (a)? _____

3. Is there a description of line management responsibilities? ... _____

4. Does line management identify problem areas and establish local goals and objectives? _____

Yes No Unknown

5. Is local management active in minority and female organizations and/or community programs? _____

6. Does local management conduct periodic audits of training, hiring, promotions, etc.? _____

7. Does the local senior management conduct discussions with other management to ensure that the policies are being followed? _____

8. Does management review qualifications to ensure minorities and women are given full opportunities for transfer and promotions? _____

9. Is career counseling available for all employees? _____

10. Does management conduct periodic audits to ensure posters are displayed, facilities are desegregated, minority and female employees get a full opportunity in company sponsored educational training and recreational activities? _____

D. Section 60-2.24, Development and Execution of Programs*

1. Is there evidence that the contractor reviews position descriptions? _____

2. Are worker specifications consistent for the same job? _____

3. Are position descriptions available to all members of management? _____

4. Are recruiters trained in EO? _____

5. Is there evidence of an active involvement with minority organizations? _____

* Note: Certain items in Sec. 60-2.24 are omitted as they are most appropriate for on-site review, if one is done.

Yes No Unknown

6. Is there evidence of an active involvement with female organizations? _____

7. Do minority and female employees refer applicants? _____

8. Are there minority and female employees on the personnel relations staff? _____

9. Does the company participate in job fairs or career days? _____

10. Is there evidence of an active recruiting program at minority schools? _____

11. Is there evidence of an active recruiting program at female schools? _____

12. Is the percent of terminations for minorities higher than for majorities? _____

13. If so, is there a valid rationale? _____
Please explain: _____

14. Is the percent of terminations for females higher than for males? _____

15. If so, is there a valid rationale? _____
Please explain: _____

E. Section 60-2.25, Internal Audit and Reporting System

1. Is there evidence that the contractor monitors its affirmative action program? _____

2. Does the contractor require formal reports from managers on the accomplishment of goals?

3. Is top management aware of the progress of the EO program?

F. Section 60-2.26, Support of Action Programs

1. Is the contractor management involved in external affirmative action programs?

2. Are employees encouraged to participate in outside organizations?

3. Does the contractor support outside training programs?

4. Does the contractor support schools in order to assist minorities and females?

5. Does the contractor publicize EO achievements?

6. Does the contractor support organizations such as NAB, etc? ...

G. Section 60-2.13, Additional Ingredients of AAP

1. Has the contractor provided evidence to support the fact that the contractor is abiding by the Sex Discrimination Guidelines (41 CFR pt. 60-20)?

2. Is there evidence that the contractor is considering minorities and women not in the work force?

H. Explain Contractor's performance against previous goals:

OFCC: On-Site Review Guidelines

The following guidelines, issued as "Attachment B" to Order No. 14 (Revised) (See 401:151), were prepared by the Office of Federal Contract Compliance to aid compliance officers in conducting on-site reviews of a nonconstruction contractor's affirmative action experiences.

ON-SITE REVIEW GUIDELINES

A. EEO Policies and Procedures

Yes No

1. Are EEO posters prominently displayed? — —

2. What EEO policy statements are posted? Please explain: — —

3. How have the lower level supervisors received and disseminated the policy? Please explain: — —

4. Is EEO part of the orientation for new employees and are there periodic meetings with employees and/or supervisors on the subject? Please explain: — —

5. What role does the EEO Coordinator play in dissemination of policy? Please explain: — —

6. How much time does he spend in EEO work?%

7. Has management expressed any intention in writing or otherwise to take disciplinary action for failure to adhere to EEO policies and procedures? Please explain:

8. Are supervisors held accountable for failure to meet EEO goals?

B. Workforce Analysis

If an adequate workforce analysis was not furnished during the off-site review, the compliance officer should ask to see, if available, the employer's representation report of his workforce summarizing the facility workforce (total male, female, and male and female for each minority group comprising 2 percent or more of the labor area) by department or organization (i.e., a logical cohesive group such as personnel, manufacturing finance, etc.) and by EEO-1 category within organization subdivided into (perhaps common) job groupings within an EEO-1 category. These job groupings should reflect one or more jobs having similar content, wage rated and opportunities. The job groupings should be ranked appropriately by skill or earnings or line of progression, or existing administrative practice. If earnings for each grouping should be given. However, for the purpose

Yes No

Yes No

1. Is the contractor maintaining an applicant flow chart which gives all the necessary information such as name, race, sex, job applied for, source of referral, date of application and disposition? ...

2. Do the forms request information which could be used in a discriminatory manner?
Specify the questionable information and who might have access to it

3. If such information is allegedly asked for affirmative action purposes, could it not be maintained on a separate record? ..

4. How long are application forms retained and describe the filing system?

5. Is there an affirmative action file or other retrieval systems to enable minorities and women to be reconsidered if no job can be offered at the time of their original application?

6. Are there written job descriptions or job specifications? If not what procedures are used instead?
.....
.....

7. Are job requisitions submitted to the employment office in

writing and how detailed are they? _____
.....

8. Are these forms or others used for external recruitment? ...

(d) Is the contractor's applicant flow adequate for the job groupings cited by you in Section 1. given the utilization factors for this facility. If not, the following further investigation into recruitment methods and resources is necessary. Summarize the contractor's explanation of the specific recruitment methods and resources utilized for each job grouping involved. Explain the impact of word-of-mouth or other employee referral systems. Explain if recruitment sources are contacted in writing at the time of actual job openings and how much information is provided to them as to the qualifications necessary. Is he actually aware of the results of his recruitment efforts? Explain if the contractor has specifically requested to have minority and women candidates among these referrals. Explain if he has discontinued using any of these sources which have failed to make such referrals. Has he instituted any transportation or housing programs to aid in minority recruitment? Describe blue collar recruitment programs if applicable. Describe in detail the job application process from the point where the applicant first makes contact with the contractor.

Yes No

1. Are different interviewers assigned to interview applicants because of their job interest,

of these Guidelines and in all cases where pay is used, alphabetic or numeric coding or the use of an index of pay ranges is acceptable and should be used when contractors are concerned about confidentiality of salary information.

C. Recruitment, Hiring, Selection and Placement

(a) If adequate applicant flow data was not furnished during the off-site review, the compliance officer should ask to see the contractor's applicant flow report summarizing total applicants by total, male, female, and male and female minority classification. While in many cases applicants are not classified by particular job, it should be possible to provide some separation of the applicant flow count into at least broad occupation groups. An applicant is defined as one who has applied for permanent employment and has complied with the company's formal application procedure. Next the report should show the number of offers of employment for each category and by total male, female, and male and female minority classifications. The report should show acceptance of offers for each category and by total male, female, and male and female minority classifications. The acceptances should also be related to the job groupings outlined in Section B. Workforce Analysis. This report should reflect applicant activity for the last six months or the last 100 acceptances, whichever is less.

(b) Where such a summary report is not available, the compliance officer should advise the contractor to maintain such data in the future, but the following collection of data should now be made to determine any problems that may exist in applicant flow and employment ratios. If the company's own data is insufficient, the CCO should obtain applications of 100 applicants for blue collar employment and 100 applicants for white collar employment or applications for a six (6) month period, whichever is the lesser. He may use a random sample period. He may exclude certain job groupings where applicants and hires are clearly not a problem and should be sure to include the job groupings cited by you in Section 1 above. Now he should construct the report described in the paragraph above showing applicants, offers and acceptances by total male and female, and male and female minority classifications by as much organization job grouping detail as possible.

(c) Sample a representative number of job requisitions on a given date and compare with minorities and women applying at the same time. Obtain copies of any other forms utilized by the personnel operation such as interview reports. Even if the contractor appears to have a well-structured record-keeping system, review examples of the procedure to assure that he is in fact using the system to assure equal employment opportunity.

recommendations.

The written validation report must be reviewed to determine whether or not the test or solution practice is valid as required by the OFCC Testing Order (41 CFR 60-3).

A compliance officer who has satisfactorily completed an adequate training course should inform contractors of apparent non-compliance with the Order when validity or evidence supporting validity of tests is absent or substantially deficient. However, since the issues involved in test validity are often quite technical and complex, the compliance officer should not try to identify or resolve these issues directly with the contractor during the review. In these cases or in any case where the compliance officer cannot make a clear determination of noncompliance, the contractor's evidence of test validity is to be submitted for higher level review along with the compliance officer's analysis of the disparate effect.

D. Terminations

(a) If adequate data on terminations was not furnished during the off-site review, the compliance officer should ask to see, if available, the employer's report on terminations at the facility summarizing terminations for total, male, female and male and female for each appropriate minority group, by organization and by EEO-1 category within organization subdivided into (perhaps common)

job groupings within EEO-1 Category. Consult Section B above, Workforce Analysis, for further guidelines on job groupings.

(b) If such a summary report is not available, for a similarly statistically significant time frame as investigated for hires, review a list of terminations, showing hire and termination dates, job assignment, minority group membership and sex. If possible, the terminations should be related to the period covered by the hiring analysis. To determine if there is an unfair disparity of company policies, the period of at least six (6) months or 100 such terminations should be reviewed, whichever is the lesser.

(c) If there is a disproportionate number of terminations because of minority group identification or sex or a pattern of placement of minority group members or women to specific kinds of jobs, the causal factor should be explored and discussed.

E. Promotion and Transfer

(a) If adequate data on promotions and transfer was not furnished during the off-site review, the compliance officer should ask to see, if available, the employer's report on promotions at the facility summarizing promotions for total, male, female and male and female for each appropriate minority group, by organization and by EEO-1 category within organization subdivided into (perhaps common) job groupings within EEO-1 category. Consult Section B above,

Workforce Analysis for further guidelines on job groupings. A promotion is defined as any personnel action resulting in movement to a position of greater skill, effort or responsibility. Wage or salary increases alone do not determine a promotion.

(b) If such a report is not available the compliance officer should review a list of 100 promotions or the last six months activity, whichever is less. The review should include name or other identification, minority group status, sex, previous job, department and pay. A promotion is defined as any personnel action resulting in movement to a position of greater skill, effort or responsibility. Wage increase alone do not determine a promotion.

(c) A determination should be made if there is a disparity between the promotion rate of minorities and women as related to the rate of non-minorities and/or males. In doing this analysis, the following procedures should be included:

Identify the various entry level positions and the promotional ladders as indicated by the contractor and by the CCO's confirmation through sample record analysis. Are these lines in any way oriented by race or sex? Please explain. With regard to promotions that are competitive, what is the significance of interest, ability and seniority in promotion and transfer considerations? Please explain. Are there any periodic written performance ratings which influence promotion or transfer? Are mi-

norities or women concentrated in certain jobs outside any line of progression or which dead end before the employees can reach the pay grade to which their experience, training or seniority might entitle them? Please explain. Is there a well-structured transfer program? Discuss any lack of representation of minorities and women in the program. Please explain.

(d) Review the file on transfer requests to determine if minorities or women have been overlooked or rejected disproportionately. Please summarize your findings. What is the frequency of inter- or intra-departmental transfer for better working conditions or to gain promotional opportunities? Is counseling offered to employees considering this move? How common is transfer for blue collar to white collar positions or from "traditionally female" or minority to "traditionally male" or non-minority jobs or vice versa? Who monitors promotion and transfer activity and through what means? How is job security affected by transfer or promotion and does this disproportionately affect minorities or women?

(e) Comment on the representation of minorities and women among supervisors and where promotions during the previous year suggest any improvement. If appropriate, review selected personnel records to conduct the following analysis. Explain how supervisors are selected. Who monitors these actions? Explain how supervisory ability is measured.

F. Wage and Salary Analysis

Review and compare wages and salaries of a sampling of minorities and women within selected job classifications. Are there positions with similar duties but with different rates of pay which seem to be related to the sex or race of the incumbents? Please explain. What is the contractor's explanation for these discrepancies? Please explain. Are the general salary ranges for jobs or specific rates at which everyone begins? Please explain. What is the contractor's explanation for this? Please explain. Who makes the determination as to what those starting rates will be? Please explain. Are the rates negotiable? Are minorities or women assigned to jobs where incentive earnings are more difficult? Please explain. Does review of any employee's records confirm or dispute the relationship of education training and experience to pay? Please explain. Are minorities and women supervising integrated groups? Are women supervisors generally at a lower plateau in the organization? Where minorities and women have been newly installed as supervisors has there been any negative reaction from the workforce and has management dealt with it? Please explain. Is there a supervisory development program? Please explain.

G. Training and Educational Opportunities

(a) If adequate data on training and ed-

ucational opportunities was not furnished during the off-site review, the compliance officer should ask to see, if available, the employer's report on training at the facility summarizing by training class the participation by total, male, female, and male and female minority classifications and showing the training participation rate for each group. The report should reflect the last six month's activity.

(b) If such a report is not available, the compliance officer should obtain from the contractor a list of various training and apprenticeship programs on-going or completed during the last six months or other identification, minority group identification, sex of participants, date of completion and job and pay before and after training. Include employees hired directly into such programs.

(c) What types of training do new employees receive? How are additional opportunities for training and education advertised? Is there evidence of any disparate failure or dropout rate? If there is a registered apprenticeship program, has the contractor provided the Bureau of Apprenticeship and Training with an acceptable affirmative action program with goals and timetables? Is formal training being required now for jobs not previously involved. Is this discriminatory? Does the contractor publicize EO achievements? Does the contractor support organizations which would assist his efforts and implement his affirmative action program?

H. Section 60-2.14 , Additional Ingredients
of AAP

Has the contractor provided evidence to support the fact that the contractor is abiding by the Sex Discrimination Guidelines (41 CFR Part 60-20)? Is there evidence that the contractor is considering minorities and women not in the work force?

Yes No Unknown

5. Has the contractor considered the expansion, contraction and turnover of the work force in developing its goals and timetables?
6. If the contractor has not established a goal, does his AAP analyze the factors in Section 60-2.11?

C. Section 60.2.23, Identification of Problem Areas

1. Complete the following:
- a. Describe goal setting method used by contractor.
- b. Review the contractor's degree of attainment of his current af-

firmative action plan goals and note any problems.

c. Complete Table Q of the Coding Sheet. If an on-site review is to be conducted, Table Q may be left until the on-site review, but suitable worksheets should now be developed.

Minority Representation Table (express as percentages)

Listing of Major Job Classifications	AAP Goal	End of Last Period	Current	Percent of Goal Attain.
Official/Manager				
Professional				
Technician				
Sales Worker				
Office/Clerical				
Craftsman				
Operative				
Laborer				
Service Worker				
Total				

* These would be subdivided into groupings of common job classifications, earnings ranges or common skill groups for each category.

c. Female Representation Table (express as percentages)

Listing of Major Job Classifications	AAP Goal	End of Last Period	Current	Percent of Goal Attain.
Official/Manager				
Professional				
Technician				
Sales Worker				
Office/Clerical				
Craftsman				
Operative				
Laborer				
Service Worker				
Total				

* These would be subdivided into groupings of common job classifications, earnings ranges or common skill groups for each category.

2. What is the percent of minority applicants?
3. What is the availability of minorities in the local work force expressed as a percent of the local work force?

4. What is the percent of female applicants?
5. What is the availability of women in the local work force expressed as a percentage?
6. Are there written job descriptions?
7. Does your review of the application form indicate any problem? .. Please explain.

8. Have all tests that are used been validated to the extent required by the DECC Testing Order?
9. a. What percent of hires by major job classification have been minority?
- b. Is this improving the utilization condition for underutilized areas? ..

10. a. What percent of hires by major job classification have been women?
- b. Is this improving the utilization condition for underutilized areas? ..

11. What percent of total promotions have been minority?

12. Is this equal to or greater than the percent of the minority representation in the contractor's work force?

13. What percent of total promotions have been women?

14. Is this equal to or greater than the percent of the female representation on the contractor's work force?

15. a. Are there inhibiting factors to equal opportunity for minorities in the transfer system?
b. Please explain:

16. a. Are there inhibiting factors to equal opportunity for women in the transfer system?

17. Does it appear that the facility and company sponsored events are open to all and participated in by all?

	Yes	No	Unknown
18. a. Are there inhibiting factors to equal opportunity in the seniority practices of the company?	_____	_____	_____
b. Please explain:	_____	_____	_____
19. Are minorities significantly underrepresented in apprenticeship or other training programs?	_____	_____	_____
Please explain:	_____	_____	_____
20. Are women significantly underrepresented in apprenticeship or other training programs?	_____	_____	_____
Please explain:	_____	_____	_____
21. Does the company focus on issues affecting minorities and women as set forth in Section 60-2.23 and does it address steps to meet such as those suggested in Section 60-2.24; i.e., housing, child care, transportation, etc. as they impact recruiting/employment?	_____	_____	_____
Please explain:	_____	_____	_____

D. Section 60-2.1, Corrective Action Programs

1. Has the contractor developed a corrective action program to the extent required by Section 60.2.1?	_____	_____	_____
2. Was this included as part of the contractor's AAP or a separate program?	_____	_____	_____
What relief has the contractor suggested for members of an identified affected class?	_____	_____	_____

Part 3—Additional Data

A. Section 60-2.20, Development or Reaffirmation of Policy

1. Does the contractor's AAP include an EEO policy statement or reaffirmation thereof?	_____	_____	_____
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2. Does the Policy Statement address those items noted in 60.2.20, paragraphs 1 through 4 in their entirety?

a. If no, in what respects is the statement deficient

B. Section 60-2.21, Dissemination of the Policy

1. Has the contractor provided substantiation of the Policy Statement in the contractor's policy manual?	_____	_____	_____
2. Are there examples of it being publicized in company publications?	_____	_____	_____
3. Has the contractor provided substantiation that management meetings have been held relative to the requirements of Sec. 60-2.21?	_____	_____	_____
4. Has the contractor provided substantiation that employees have attended meetings relative to the requirements of Sec. 60-2.21?	_____	_____	_____
5. Has the contractor provided substantiation that EO is covered in new employee orientation and management training?	_____	_____	_____
6. Has the contractor provided substantiation that union officials have been informed of the policy?	_____	_____	_____
7. Are there nondiscrimination clauses in all union contracts?	_____	_____	_____
8. Have there been articles published on EO programs, progress reports, etc.?	_____	_____	_____
9. If employees are featured in image or product advertisements, do they show minorities and women? ..	_____	_____	_____
10. Is there evidence of communications to employees concerning the contractor's AAP?	_____	_____	_____
11. Have all recruiting sources the contractor uses been informed verbally and in writing of company policy?	_____	_____	_____
12. Is the EO clause incorporated in the contractor's Purchase Order? ..	_____	_____	_____
13. Has the contractor provided substantiation that it is notifying minority/female organizations in writing of the company policy?	_____	_____	_____

14. Is there evidence that the contractor communicates to prospective employees the existence of the AAP?

15. Are minority and female employees shown in consumer or help wanted advertising?

16. Has the contractor provided substantiation that it notifies subcontractor, vendor and suppliers of company EO policy?

C. Section 60-222, Responsibility for Implementation

1. Is there evidence that an executive has been appointed as director or manager of the Company EO program?

2. a. Is there a description of the executive's responsibilities?

b. Does it include those elements as noted in Section 60-222, paragraph (a)?

3. Is there a description of line management responsibilities?

4. Does line management identify problem areas and establish local goals and objectives?

5. Is local management active in minority and female organizations and/or community programs?

6. Does local management conduct periodic audits of training, hiring, promotions, etc.?

7. Does the local senior management conduct discussions with other management to ensure that the policies are being followed?

8. Does management review qualifications to ensure minorities and women are given full opportunities for transfer and promotions?

9. Is career counseling available for all employees?

10. Does management conduct periodic audits to ensure posters are displayed, facilities are desegregated, minority and female employees get a full opportunity in company sponsored educational training and recreational activities?

Yes No Unknown

D. Section 60-224, Development and Execution of Programs*

1. Is there evidence that the contractor reviews position descriptions?

2. Are worker specifications consistent for the same job?

3. Are position descriptions available to all members of management?

4. Are recruiters trained in EO?

5. Is there evidence of an active involvement with minority organizations?

6. Is there evidence of an active involvement with female organizations?

7. Do minority and female employees refer applicants?

8. Are there minority and female employees on the personnel relations staff?

9. Does the company participate in job fairs or career days?

10. Is there evidence of an active recruiting program at minority schools?

11. Is there evidence of an active recruiting program at female schools?

12. Is the percent of terminations for minorities higher than for majorities?

13. If so, is there a valid rationale? Please explain:

14. Is the percent of terminations for females higher than for males?

15. If so, is there a valid rationale? Please explain:

16. If so, is there a valid rationale? Please explain:

17. If so, is there a valid rationale? Please explain:

E. Section 60-225, Internal Audit and Reporting System

1. Is there evidence that the contractor monitors its affirmative action program?

2. Does the contractor require formal reports from managers on the accomplishment of goals?

3. Does the contractor require formal reports from managers on the accomplishment of goals?

4. Does the contractor require formal reports from managers on the accomplishment of goals?

5. Does the contractor require formal reports from managers on the accomplishment of goals?

6. Does the contractor require formal reports from managers on the accomplishment of goals?

7. Does the contractor require formal reports from managers on the accomplishment of goals?

Yes No

*Note: Certain items in Sec. 60-224 are omitted as they are most appropriate to review, if one is done.

monate

3. Is top management aware of the progress of the EO program?

Yes

No

Unknown

F. Section 60-2.26, Support of Affirmative Programs

1. Is the contractor management involved in external affirmative action programs?

2. Are employees encouraged to participate in outside organization?

3. Does the contractor support outside training programs?

4. Does the contractor support schools in order to assist minorities and females?

5. Does the contractor publicize EO achievements?

6. Does the contractor support organizations such as NAB, etc?

G. Section 60-2.13, Additional Ingredients of AAP

1. Has the contractor provided evidence to support the fact that it is abiding by the Sex Discrimination Guidelines (41 CFR Part 60-20)?

2. Is there evidence that the contractor is considering minorities and women not in the work force?

H. Explain Contractor's performance against previous goals:

OFFICE: On-Site Review Guidelines

The following guidelines, issued as "Attachment B" to Order No. 14 (Revised) (See 481511), were prepared by the Office of Federal Contract Compliance to aid compliance officers in conducting on-site reviews of a nonconstruction contractor's affirmative action experiences.

ON-SITE REVIEW GUIDELINES

A. EEO Policies and Procedures

- Yes No
1. Are EEO posters prominently displayed?
 2. What EEO policy statements are posted? Please explain:
 3. How have the lower level supervisors received and disseminated the policy? Please explain:
 4. Is EEO part of the orientation for new employees and are there periodic meetings with employees and/or supervisors on the subject? Please explain:
 5. What role does the EEO Coordinator play in dissemination of policy? Please explain:
 6. How much time does he spend in EEO work?
 7. Has management expressed any intention in writing or otherwise to take disciplinary action for failure to adhere to EEO policies and procedures? Please explain:
 8. Are supervisors held accountable for failure to meet EEO goals?

B. Workforce Analysis

If an adequate workforce analysis was not furnished during the off-site review, the compliance officer should ask to see, if available, the employer's representation report of his workforce summarizing the facility workforce (total male, female, and male and female for each minority group, comprising 2 percent or more of the labor area) by department or organization (i.e., a logical cohesive group such as personnel, manufacturing, finance, etc.) and by EEO-1 category within organization subdivided into (perhaps common) job groupings within an EEO-1 category. These job groupings should reflect one or more jobs having similar content, wage rates and opportunities. The job groupings should be ranked appropriately by skill or earnings or line of progression, or existing administrative practice. If earnings for each grouping should be given. However, for the purpose of these Guidelines and in all cases where pay is used, alphabetic or numeric coding or the use of an index of pay ranges is acceptable and should be used when contractors are concerned about confidentiality or salary information.

C. Recruitment, Hiring, Selection and Placement

(a) If adequate applicant flow data was not furnished during the off-site review, the compliance officer should ask to see the contractor's applicant flow report summarizing total applicants by total, male, female, and male and female minority classifications. While in many cases applicant are not classified by particular job, it should be possible to provide some separation of the applicant flow count into at least broad occupation groups. An applicant is defined as one who has applied for permanent employment and has complied with the company's formal application procedure. Next the report should show the number of offers of employment for each

category and by total, male, female

and made and female minority classifications. The report should show acceptance of offers for each category and by total, male, female and male and female minority classifications. The acceptances should also be related to the job groupings outlined in Section B, Workforce Analysis. This report should reflect applicant activity for the last six months or the last 100 acceptances, whichever is less.

(b) Where such a summary report is not available, the compliance officer should advise the contractor to maintain such data in the future, but the following collection of data should now be made to determine any problems that may exist in applicant flow and employment ratios. If the company's own data is insufficient, the COO should obtain applications of 100 applicants for blue collar employment and 100 applicants for white collar employment, or applications for a six (6) month period, whichever is the lesser. He may use a random sample or an immediate past chronological period. He may exclude certain job groupings where applicants and hires are clearly not a problem and should be sure to include the job groupings cited by you in Section 1 above. Now he should construct the report described in the paragraph above showing applicants, offers and acceptances by total, male and female, and male and female minority classifications by as much organization job grouping detail as possible.

(c) Sample a representative number of job requisitions on a given date and compare with minorities and women applying at the same time. Obtain copies of any other forms utilized by the personnel operation such as interview reports. Even if the contractor appears to have a well-structured recordkeeping system, review examples of the procedure to assure that he is in fact using the system to assure equal employment opportunity.

taining an applicant flow chart which gives all the necessary information such as name, race, sex, job applied for, source of referral, date of application and disposition?

2. Do the forms request information which could be used in a discriminatory manner? Specify the questionable information and who might have access to it

3. If such information is allegedly asked for affirmative action purposes, could it not be maintained on a separate record?

4. How long are application forms retained and describe the filing system?

5. Is there an affirmative action file or other retrieval systems to enable minorities and women to be reconsidered if no job can be offered at the time of their original application?

6. Are there written job descriptions or job specifications? If not what procedures are used instead?

7. Are job requisitions submitted to the employment office in writing and how detailed are they?

8. Are these forms or others used for external recruitment?

(d) Is the contractor's applicant flow adequate for the job groupings cited by you in Section 1, and utilization factors for this facility not, the following further investigation into recruitment methods/resources is necessary. Summarize the contractor's explanation of specific recruitment methods and resources utilized for each job group

facility? if not

involved. Explain the impact of word-of-mouth or other employee referral systems. Explain if recruitment sources are contacted in writing at the time of actual job openings and how much information is provided to them as to the qualifications necessary. Is he actually aware of the results of his recruitment efforts? Explain if the contractor has specifically requested to have minority and woman candidates among these referrals. Explain if he has discontinued using any of these sources which have failed to make such referrals. Has he instituted any transportation or housing programs to aid in minority recruitment? Describe any other recruitment programs if applicable. Describe in detail the job application process from the point where the applicant first makes contact with the contractor.

Yes No

- 1. Are different interviewers assigned to interview applicants because of their job interest, race or sex? — —
- 2. Is job counseling offered? — —
- 3. If not hired, is the applicant given a specific reason and is it noted on the application form? — —
- 4. If an applicant is not hired, what happens to the application form? Please explain: ..
- 5. Who makes the final decision for hire and on what basis? ..
- 6. If additional interviews are conducted, is there feedback to the employment office? — —
- 7. Does anyone monitor for disparate rejection ratios of minorities and women? ..
- What? ..

- 8. Can and does anyone challenge decisions made by the selecting officials? ..
- Please explain: ..
- 9. Are those who make selection conscious of the contractor's goals and timetables? ..
- Please explain: ..
- 10. What role does the EEO Coordinator play in the selection process? Please explain: ..

(c) Review a representative sample of personnel records of hires from different periods of time in various job categories.

- 1. From discussions with the interviewers and supervisors as well as from comments appearing on the application forms, what appear to be some of the more subjective criteria? Please explain: ..
- 2. Does the contractor claim any bona fide occupational qualifications to justify sex discrimination? Please explain: ..
- (f) If the contractor states that the tests it uses have been validated, a written report must be available specifying size of samples used and minority and sex composition, nature of jobs, criteria, methods of analysis, and results and recommendations. The written validation report must be reviewed to determine whether or

valid as required by the OFCC Working Order (41 CFR 60-3).

A compliance officer who has satisfactorily completed an adequate training course should inform contractors of apparent noncompliance with the Order when validity or evidence supporting validity of tests is absent or substantially deficient. However, since the issues involved in test validity are often quite technical and complex, the compliance officer should not try to identify or resolve these issues directly with the contractor during the review. In these cases or in any case where the compliance officer cannot make a clear determination of noncompliance, the contractor's evidence of test validity is to be submitted for higher level review along with the compliance officer's analysis of the disparate effect.

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(b) If such a summary report is not available, for a similarly statistically significant time frame as investigated for hires, review a list of terminations, showing hire and termination dates, job assignment, minority group membership and sex. If possible, the terminations should be related to the period covered by the hiring analysis. To determine if there is an unfair disparity of company policies, the period of at least six (6) months or .01 such terminations should be reviewed, whichever is the lesser.

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(b) If such a report is not available, the compliance officer should review a list of 100 promotions or the last six months' activity, whichever is less. The review should include name or other identification, minority group status, sex, previous job, department and pay, and new job and department and pay. A promotion is defined as any personnel action resulting in movement to a position of greater skill, effort or responsibility. Wage increases alone do not determine a promotion.

(c) A determination should be made if there is a disparity between the promotion rate of minorities and women as related to the rate of terminations and/or males. In doing this analysis, the following procedures should be included:

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time in any way oriented by race or sex? Please explain. With regard to promotions that are competitive, what is the significance of interest, ability and seniority in promotion and transfer considerations? Please explain. Are there any periodic written performance ratings which influence promotion or transfer? Are minorities or women concentrated in certain jobs outside any line of progression or which dead end before the employees can reach the pay grade, to which their experience, training or seniority might entitle them? Please explain. Is there a well-structured transfer program? Discuss any lack of representation of minorities and women in this program. Please explain.

(d) Review the file on transfer requests to determine if minorities or women have been overlooked or rejected disproportionately. Please summarize your findings. What is the frequency of inter- or intra-departmental transfer for better working conditions or to gain promotional opportunities? Is counseling offered to employees considering this move? How common is transfer from blue collar to white collar positions or from "traditionally female" or minority to "traditionally male" or non-minority jobs or vice versa? Who monitors promotion and transfer activity and through what means? How is job security affected by transfer or promotion and does this disproportionately affect minorities or women?

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duties but with different rates of pay which seem to be related to the sex or race of the incumbents? Please explain. What is the contractor's explanation for these discrepancies? Please explain. Are the general salary ranges for jobs or specific rates at which everyone begins? Please explain. Do minority and women workers appear to be paid lower rates to begin with? Please explain. What is the contractor's explanation for this? Please explain. Who makes the determination as to what those starting rates will be? Please explain. Are the rates negotiable? Are minorities or women assigned to jobs where incentive earnings are more difficult? Please explain. Does review of any employee's records confirm or dispute the relationship of education, training and experience to pay? Please explain. Are minorities and women supervising integrated groups? Are women supervisors generally at a lower plateau in the organization? Where minorities and women have been newly installed as supervisors has there been any negative reaction from the workforce and how has management dealt with it? Please explain. Is there a supervisory development program? Please explain.

G. Training and Educational Opportunities

(a) If adequate data on training and educational opportunities was not furnished during the off-site review, the compliance officer should ask to see, if available, the employer's report on training at the facility summarizing by training class the participation by total, male, female and male and female minority classifications and showing the training participation rate for each group. The report should reflect the last six months' activity.

(b) If such a report is not available, the compliance officer should obtain from the contractor a list of various training and apprenticeship programs on-going or completed during the last six months or other

being required now for jobs not previously involved? Is this discriminatory? Does the contractor publicize achievements? Does the contractor support organizations which assist his efforts and implement his affirmative action program?

(c) What types of training do new employees receive? How are additional opportunities for training and education advertised? Is there evidence of any disparate failure or dropout rate? If there is a registered apprenticeship program, has the contractor provided the Bureau of Apprenticeship and Training with an acceptable affirmative action program with goals

being required now for jobs not previously involved? Is this discriminatory? Does the contractor publicize achievements? Does the contractor support organizations which assist his efforts and implement his affirmative action program?

H. Section 60-2.13, Additional Ingredients of AAP

Has the contractor provided evidence to support the fact that the contractor is abiding by the Sex Discrimination Guidelines (41 CFR Part 60-20)? Is there evidence that a contractor is considering minorities and women not in the work force

SPIN COLLOID MILES

Messing Book



Affirmative Action
Meeting

NCSU AFFIRMATIVE ACTION RECRUITMENT REPORT
(Fill out for each EPA position filled)

Department of: _____

EPA position filled: _____
(rank and area of specialization if appropriate)

Fulltime _____; Part time _____; Date employment effective _____

Number of groups, institutions, etc. notified about vacancy: _____
(list on back specific efforts to locate females and minorities)

Number of ^{written} applications received:

Male	Female	
		Black
		White
		Other
		Unknown

Number of candidates invited to campus
or interviewed elsewhere:

Male	Female	
		Black
		White
		Other

Offer ^{to be} made to: ~~be made to~~ (list in order):

Name	Sex	Race	Present Employer	Accepted	Rejected
1. _____					
2. _____					
3. _____					

Do you have files documenting your efforts to take affirmative action to locate female and minority candidates for this position? Yes No

Can you provide an explanation for the offers made by explicitly comparing the qualifications of those offered the position with those not offered the position? Yes No

Signed _____ Date _____
Department Head

Signed _____ Date _____

These files should be maintained for three (3) years.



IN

PROFESSIONAL ASSOCIATIONS * °°

ACADEMY OF MANAGEMENT

Committee on the Status of Women in the Management Profession

Chair: Dr. Kathryn M. BartolDept. of Mgt., School of Business Administration
U. of Massachusetts, Amherst, MA 01002

ADULT EDUCATION ASSOCIATION

Commission on the Status of Women in Adult Education

Chair: Ms. Yvonne Rappaport, Consortium Bldg.,

George Mason U., Fairfax, VA 22030

AMERICAN ACADEMY OF RELIGION °°

TF on the Status of Women - The Academic Study of Religion

Chair: Ms. Elizabeth Schussler Fiorenza, 1223 N.

Lawrence St., So. Bend, IN 46617

AMERICAN ANTHROPOLOGICAL ASSOCIATION °°

Committee on the Status of Women in Anthropology

Co-Chairs: Prof. Carol Vance, Dept. of Anthropology,

Columbia U., New York, NY 10027; Prof. Lucie Wood

Saunders, Dept. of Anthropology, Lehman College,

Bronx, New York, NY 10467

AMERICAN ASSOCIATION FOR THE ADVANCEMENT OF SCIENCE

Women's Caucus of the A.A.A.S.

Chair: Ms. Virginia Walbot, Dept. of Biochemistry,

U. of Georgia, Athens, GA 30601

AMERICAN ASSOCIATION FOR HEALTH & PHYSICAL EDUCATION

Committee on Women

Chair: Prof. Ione G. Shaddock, Drake U., Des

Moines, IA 50311

AMERICAN ASSOCIATION OF IMMUNOLOGISTS °°

Committee on the Status of Women

Chair: Dr. Helena C. Rauch, Dept. of Medical

Microbiology, Stanford U., School of Medicine,

Stanford, CA 94305

AMERICAN ASSOCIATION OF UNIVERSITY PROFESSORS

Committee on the Status of Women in the Profession

Chair: Dr. Alice S. Rossi, Dept. of Sociology,

Goucher College, Towson, MD 21204

AAUP Contact: Ms. Margaret Rumbarger, Associate

Secretary, AAUP, One Dupont Circle, Wash. DC 20036

AMERICAN ASTRONOMICAL SOCIETY

Working Group on the Status of Women in Astronomy

Chair: Dr. Anne P. Cowley

Research Associate, Astronomy Dept.

U. of Michigan, Ann Arbor, MI 48103

AMERICAN CHEMICAL SOCIETY

Women Chemists Committee

Chair: Dr. Susan Collier, Research Lab.,

Eastman Kodak Co., Rochester, NY 14650

AMERICAN COLLEGE PERSONNEL ASSOCIATION

Women's Task Force

Chair: Dr. Mary Howard, Federal City College,

425 Second Street, NW, Wash., DC 20001

including some independent organizations

AMERICAN ECONOMIC ASSOCIATION

Committee on the Status of Women in the Economics Profession

Chair: Dr. Carolyn Shaw Bell, Wellesley College,
Wellesley, MA 02181

AMERICAN EDUCATIONAL RESEARCH ASSOCIATION

Women's Caucus

Chair: Ms. Noele Krenkel, Researcher, San

Francisco Unified School District, 135 Van Ness,

San Francisco, CA 94102

AMERICAN FEDERATION OF TEACHERS

Women's Rights Committee

Chair: Ms. Marjorie Stern, 1012-14th Street,

Wash., DC 20004

AMERICAN HISTORICAL ASSOCIATION °°

a. Committee on Women Historians

Chair: Dr. Jane deHart Matthews

U. of North Carolina, Greensboro, NC 27412

(Staff Liaison: Dr. Charlotte Quinn, 400

A Street, SE, Wash., DC 20004

b. Coordinating Committee on Women in the Historical Profession

Chair: Dr. Sandi Cooper, Richmond College,

CUNY, Staten Island, NY 10301

AMERICAN INSTITUTE OF PLANNERS

Women's Rights Committee

Chair: Ms. Diana C. Donald, 1776 Mass. Ave., NW,
Wash., DC 20036

AMERICAN LIBRARY ASSOCIATION °°

Social Responsibilities Round Table

Task Force on the Status of Women

Chair: Ms. Lynne Rhodes

4004 Whitman North, Seattle, WA 98103

AMERICAN MATHEMATICAL SOCIETY - ASSOCIATION FOR

WOMEN IN MATHEMATICS (Independent group) °°

Chair: Prof. Mary Gray, Dept. of Mathematics,

The American University, Washington, DC 20016

AMERICAN PERSONNEL AND GUIDANCE ASSOCIATION

Women's Caucus

Correspondent: Ms. Beverly B. Clark, 10649

Weymouth St., Bethesda, MD 20014

AMERICAN PHILOLOGICAL ASSOCIATION

Women's Caucus

Chair: Prof. Sarah B. Pomeroy, Hunter College,
Box 1264, 695 Park Avenue, New York, NY 10021

Committee on the Status of Women

Chair: Prof. Mary R. Lefkowitz, Dept. of Greek
& Latin, Wellesley College, Wellesley, MA 02181

AMERICAN PHILOSOPHICAL ASSOCIATION

a. Women's Caucus

Chair: Prof. Mary Mothersill, Dept. of

Philosophy, Barnard College, New York, NY

10027

b. Society for Women in Philosophy (Independent Group)

Chair: Prof. Hannah Hardgrave, Dept. of

Philosophy, Western Illinois U., Macomb, IL

61455

°°These groups all have a known roster of women. Others have channels through which women may be referred or print listings or job openings in their newsletters.

AMERICAN PHYSICAL SOCIETY °°

Committee on Women in Physics
Chair: Dr. Esther Conwell, Physics Research Lab.,
Xerox Sq. W-114, Rochester, NY 14644

AMERICAN PHYSIOLOGICAL ASSOCIATION

Task Force on Women in Physiology
Chair: Dr. Elizabeth Tidball, Dept. of Physiology,
George Wash. U. Medical Center, 2300 Eye St., NW,
Wash., DC 20037

AMERICAN POLITICAL SCIENCE ASSOCIATION °°

- a. Committee on the Status of Women in the Profession
Chair: Ms. Carole Parsons, 2400 Virginia Ave.,
NW #1102, Wash., DC 20037
- b. Women's Caucus for Political Science
Chair: Dr. Marie Rosenberg, School of Business,
U. of Wisconsin, Eau Claire WI 54701
Permanent address of caucus: Mount Vernon
College, 2100 Foxhall Rd., NW, Wash., DC 20007

AMERICAN PSYCHOLOGICAL ASSOCIATION

Ad Hoc Committee on Women in Psychology
Chair: Dr. Martha Mednick, Dept. of Psychology,
Howard U., Wash., DC 20001
(Staff Liaison: Dr. Brenda Gurel, APA, 1200 17th
St., NW, Wash., DC 20036)

AMERICAN PUBLIC HEALTH ASSOCIATION

Women's Caucus
Correspondent: Ms. Mary Plaska, APHA Women's
Caucus, 1015 - 16th St., NW, Wash., DC 20036

AMERICAN SOCIETY OF BIOLOGICAL CHEMISTS

Subcommittee on the Status of Women
Chair: Dr. Loretta Leive, Bldg. 4, Rm. 111,
National Institute of Health, Bethesda, MD 20014

AMERICAN SOCIETY FOR MICROBIOLOGY °°

Committee on the Status of Women Microbiologists
Chair: Dr. Mary Louise Robbins, School of
Medicine and Health Sciences, George Wash. U.,
2300 Eye St., NW, Wash., DC 20037

AMERICAN SOCIETY FOR PUBLIC ADMINISTRATION

Task Force on Women in Public Administration
Chair: Mrs. Joan Fiss Bishop, Director, Career
Services, Wellesley College, Wellesley, MA
02181

AMERICAN SOCIETY FOR TRAINING AND DEVELOPMENT

Women's Caucus, ASTD
Steering Committee: Dr. Shirley McCune, Center for
Human Relations, NEA, 1201 - 16th St., NW, Wash.,
DC, 20036; Ms. Althea Simmons, Director of Training,
NAACP, 200 E. 27th St., New York, NY 10016

AMERICAN SOCIOLOGICAL ASSOCIATION

- a. Ad Hoc Committee on the Status of Women in
Sociology
Chair: Cora B. Marrett, Dept. of Sociology,
Western Michigan U., Kalamazoo, MI 49001
- b. Sociologists for Women in Society
(Independent group, formerly a caucus)
Chair: Dr. Joan Huber, Dept. of Sociology, U.
of Illinois, Urbana, IL 61801

AMERICAN SPEECH AND HEARING ASSOCIATION

Subcommittee on the Status of Women
Chair: Ms. Dorothy K. Marge, 8011 Longbrook Rd.,
Springfield, VA 22152

AMERICAN STATISTICAL ASSOCIATION

Caucus for Women in Statistics
Chair: Dr. Donna Brogan, Dept. of Statistics
and Biometry, Emory U., Atlanta, GA 30322

Committee on Women in Statistics

Chair: Dr. Jean D. Gibbons, College of Commerce
and Business Administration, U. of Alabama,
University, AL 35486

AMERICAN STUDIES ASSOCIATION

ASA Committee on Women
National Coordinator: Ms. Joanna Schneider
Zangrando, 501 Mineola Ave., Akron, OH 44320

ASSOCIATION OF AMERICAN GEOGRAPHERS

Committee on Women in Geography
Chair: Dr. Ann Larrimore, Dept. of Geography,
U. of Michigan, Ann Arbor, MI 48104

ASSOCIATION OF AMERICAN LAW SCHOOLS °°

Committee on Women in the Legal Education
Presiding Members: Prof. Ruth B. Ginsburg,
Columbia Law School, 435 West 116th St., New York,
NY 10027; Prof. Shirley R. Bysiewicz, U. of
Connecticut School of Law, 1280 Asylum Ave., W.
Hartford, CN 06105

ASSOCIATION OF ASIAN STUDIES

Committee on the Status of Women
Chair: Prof. Joyce K. Kallgren, Center for
Chinese Studies, 2168 Shattuck Ave., Berkeley, CA
94705

ASSOCIATION OF WOMEN IN ARCHITECTURE °°

President: Ms. Dorothy Gray Harrison, 2115 Pine
Crest Dr., Altadena, CA 91001

ASSOCIATION FOR WOMEN IN PSYCHOLOGY °° (Independent
group, initially a caucus within APA)

Public Relations Editor: Dr. Leigh Marlowe, Man-
hattan Community College, 180 West End Ave., New
York, NY 10023
Correspondent: Dr. Dorothy Camara, 70012 Western
Ave., Chevy Chase, MD 10023
Liaison: Dr. Dolores Muhich, 516 So. University
Ave., Carbondale, IL 62901

ASSOCIATION OF WOMEN IN SCIENCE (Independent
group) °°

President: Dr. Estelle Ramey, 1818 R St., NW,
Wash., DC 20009

BIOPHYSICAL SOCIETY °°

Professional Opportunities for Women of the Bio-
physical Society -- Caucus of Women Biophysicists
Chair: Dr. Daphne Hare, School of Medicine, SUNY,
Buffalo, NY 14215

CHURCH EMPLOYED WOMEN °°

Contact: Ms. Mildred G. Lehr, The Westminster
Press, 900 Witherspoon Bldg, Philadelphia, PA
19107

COLLEGE ART ASSOCIATION

Commission on the Status of Women in Art and
Women's Caucus
Chair: Prof. Ann Harris, 560 Riverside Dr. #17P,
New York, NY 10027

COLLEGE MUSIC SOCIETY

CMS Women's Caucus
Co-Chairs: Dr. Carolyn Raney, Peabody Conservatory
of Music, Baltimore, MD 21202; Dr. Adrienne F.
Block, Dept. of Performing & Creative Arts,
Staten Island Community College, SI, NY 10301

GRADUATE WOMEN IN SCIENCE (Sigma Delta Epsilon)
President: Ms. Hope Hopps, 1762 Overlook Dr.,
Silver Spring, MD 20903

LATIN AMERICAN STUDIES ASSOCIATION

a. Women's Coalition of Latin Americanists
Co-Chairs: Dr. Elsa M. Chaney, Dept. of Pol.
Sci., Fordham U., Bronx, NY 10458; Dr. Asuncion
Lavrin, 8501 Manchester Rd., Silver Spring,
MD 20901

b. Women's Committee
Chair: Dr. Nancie L. Gonzalez
Dept. of Anthropology, Boston U.
232 Bay State Rd., Boston, MA 02215

LINGUISTIC SOCIETY OF AMERICA

ISA Women's Caucus
Correspondents: Ms. Lynette Hirschman, Ms. Georgette
Toup, 162 W. Hansberry, Philadelphia, PA 19144

MODERN LANGUAGE ASSOCIATION

a. MLA Commission on the Status of Women in the
Profession
Chair: Dr. Elaine Hedges, Towson State College,
Baltimore, MD 21204

b. Women's Caucus of the MLA
President: Ms. Dolores Barracano Schmidt,
R.D. 3, Slippery Rock, PA 16057

NATIONAL ASSOCIATION OF BANK WOMEN °°

Asst. Exec. Dir.: Ms. Sharon Pierce
NABW, 111 E. Wacker Dr., Chicago, IL 60601

**NATIONAL ASSOCIATION OF STUDENT PERSONNEL ADMINISTRA-
TORS**

Task Force on Women
Chair: Ms. E. Susan Petering, Asst. Dean of Students,
Framingham State College, Framingham, MA 01701

**NATIONAL ASSOCIATION FOR WOMEN DEANS, ADMINISTRATORS
AND COUNSELORS**

Executive Director: Ms. Joan McCall
1028 Connecticut Ave., NW, Wash., DC 20036

NATIONAL COUNCIL FOR THE SOCIAL STUDIES

Committee on Social Injustice for Women
Chair: Dr. Dell Felder, U. of Houston, Houston,
TX 77004

NATIONAL COUNCIL OF ADMINISTRATIVE WOMEN IN EDUCATION

President: Ms. Fern Ritter, 1815 Fort Myer Dr.,
No. Arlington, VA 22209

NATIONAL COUNCIL ON FAMILY RELATIONS

Task Force on Women's Rights and Responsibilities
Chair: Dr. Rose Somerville, Sociology Dept., San
Diego State College, San Diego, CA 92115

NATIONAL COUNCIL OF TEACHERS OF ENGLISH

Women's Committee
Chair: Dr. Janet Emig, Dept. of English, Rutgers
U., New Brunswick, NJ 08903

NATIONAL EDUCATION ASSOCIATION

Women's Caucus
Chair: Ms. Helen Bain, NEA, 1201 - 16th St.,
Wash., DC 20036

NATIONAL VOCATIONAL GUIDANCE ASSOCIATION

NVGA Commission on the Occupational Status of
Women
Chair: Ms. Thelma C. Lennon, Director, Pupil
Personnel Services, Dept. of Public Instruction,
Raleigh, NC 27602

PHILOSOPHY OF EDUCATION SOCIETY

a. Women's Caucus
Chair: Dr. Elizabeth Steiner Maccia,
Dept. of History and Philosophy of Education,
Indiana U., Bloomington, IN 47401

b. Committee on the Status of Women (same)

POPULATION ASSOCIATION OF AMERICA

Women's Caucus
Chair: Prof. Nancy E. Williamson, Brown U.,
Providence, RI 02912

PROFESSIONAL WOMEN'S CAUCUS

P.O. Box 1057, Radio City Station, New York, NY,
10019
President: Ms. Margaret Anderson, Rockland City
Guidance Center for Women, 10 Broadway, Nyack,
NY 10960

SOCIETY FOR CELL BIOLOGY

Women in Cell Biology
Chair: Ms. Virginia Walbot, Dept. of Bio-chemistry,
U. of Georgia, Athens, GA 30601

SOCIETY OF AMERICAN ARCHIVISTS

Ad Hoc Committee on the Status of Women in the
Archival Profession
Chair: Dr. Mabel Deutrich, Director, Military
Archives Div., National Archives & Records
Service, Wash. DC 20408

SOCIETY OF WOMEN ENGINEERS °°

Executive Secretary: Winifred D. White, 345 E.
47th St., New York, NY 10017

UNITED PRESBYTERIAN CHURCH IN THE USA

Task Force on Women
Co-Chairs: Ms. Patricia Doyle and Ms. Elaine
Hornighouse, Board of Christian Education, United
Presbyterian Church, Witherspoon Bldg.,
Philadelphia, PA 19107

WOMEN ARCHITECTS, LANDSCAPE ARCHITECTS, AND PLANNERS

39 Martin St., Cambridge, MA 02138

WOMEN IN COMMUNICATIONS °°

President: Ms. Fran Harris, WWJ Stations, Detroit,
MI 48231

A number of these organizations have recently formed
a federation to coordinate their efforts, share
resources, and promote professional career opportuni-
ties for women:

FEDERATION OF ORGANIZATIONS FOR PROFESSIONAL WOMEN

1818 R St., NW, Wash., DC 20009

October 1973

Dr. Ruth M. Oltman
Asst. Director of Program -
Higher Education
AAUW, 2401 Virginia Ave., NW
Wash., DC 20037

RECENT CHANGES IN LISTING

AMERICAN ASSOCIATION OF UNIVERSITY PROFESSORS

Committee on the Status of Women in the Profession

Chair: Dr. Mary Gray, Dept. of Mathematics, The American University,
Washington, DC 20016

AMERICAN HISTORICAL ASSOCIATION°°

(Staff Liaison: Dr. Eleanor Straub, AHA, 400 A Street, SE, Washington,
DC 20004)

AMERICAN POLITICAL SCIENCE ASSOCIATION°°

Women's Caucus for Political Science

Chair: Dr. JoAnn Aviel, California State University, at San Francisco,
San Francisco, CA 94132

AMERICAN SOCIETY FOR PUBLIC ADMINISTRATION

Standing Committee on Women in Public Administration

Chair: Mrs. June Martin, Legislative Standing Committee, N.Y. State
Legislature, 830 Legislative Bldg., Albany, NY 12224

AMERICAN ACADEMY OF RELIGION°°

Women's Caucus - Religious Studies

Chairs: Ms. Mary Wakeman, University of North Carolina, Greensboro, NC
27412 and Ms. Margaret M. Earley, Alverno College, Milwaukee, WI 53215

Supplement to Appendix II

(a) The contractor

On-site Review Guidelines

C. Recruitment, hiring, selection and placement

Meeting with representatives

Meeting of Campus representatives with same disciplines through WNC-GA to coordinate availability data.

Update in by end of May send in June
Memo to come

Affirmative Action Meeting

December 5, 1973

UNG-GA coordinated by Dick Robinson

Acceptable second drafts of affirmative action -
EEO

- * Expectations - Comprehensive document covering every point in Revised Order # 4
- * Each Point must be addressed in plan

60-2.21

60-2.22 Guidelines for responsibility

60-2.24 Development & execution of programs

60-2.25 Audit

60-2.26 Support of Community action programs

60-2.12 Establishment of goals

hurried & superficial review not comprehensive catalog of all things that need to be done.

Comprehensively redo plan in accordance of Revised Order # 4

CH in January 15

all by February 15 through UNG-GA

MIT and Columbia

not acceptable now

Before "acceptance" probably an onsite review to be sure we are doing all indicate that you are doing. Probably never receive "acceptable" letter - ^{Plan} not rejected

Programs

- I. Preamble
- II. Reaffirmation of Equal EO principle
Example Appendix G
- III. Publicizing the EEO policy
Follow scrupulously all points listed
Appendix H
- IV. Responsibility for Implementation of the Plan
- V. Identification of Problems (60-2.23 & 60-2.11 & 2.12
Important
- VI. Development & Execution of Corrective and
Remedial Programs
- VII. Internal Audit and Reporting Systems

Uniformity on basic techniques - generate a
representative applicant pool
Departmental efforts are selective

I. Utilization and Availability Analyses and
Goals and Timetable

Note

A. Define where are now - Data file for
every individual [Absolute Necessity]
Appendix presentation pages 3 & 4

Redo in terms suggested

By Departments
Rank & job

Goals

Departmental or Aggregate bases

Stick with June 15

CH left goal dates as were - inaccurate original data

Profiles

Permanent part time

~~EPA Faculty~~

EPA Faculty

Appointments for
academic year

~~Administrators~~

~~Deans Dept Chairmen reported in Department
where has professional rank~~

EPA Faculty

Administrator

Department Head

EPA Faculty

Appointments for academic year

SPA

~~20 Hours per week~~

EPA

EMPLOYEES PROGRAM

Initial

Reappointment

EPA Nonrenewals

Atlanta exempted temporary personnel

● Breaking out "Other Minorities" as many as 5% need to break out there and report under all parameters

Differentiate between Departmental Chairmen and other Administrators on Affirmative Action Plan

Separate goals on administrators except for Dept. Chair.

EPA Non-faculty
Professional - Researchers

Not report on actual job classification
Use EEO job reporting categories

Managerial
Printed out in appendix form who is in this classification

For plan submit Summary have to have detailed data for HEW onsite inspection

EPA Non-Faculty
Fall into three classifications

- Officials and Managers
- Professionals
- Technicians
- Office and Clerical
- Craftmen (skilled)
- Craftmen (unskilled)

Census Bureau Census of Population
Occupation Classification on
specific categories of employment

Availability data describe ^{in detail} sources looked into
to find availability data

Goal setting process in cases where
no availability data

WNC-CH Bibliography included as appendix to
memorandum

GOALS

NEW HIRINGS

SPA personnel
1 year interval

EPA personnel
3 year intervals but annual reports

p 18

Additional Problem Areas ^{RD#4}
2.23 & 2.24

Be very literal about this
reflect the type of analysis looked at

Not needed for EPA & Non-EPA

accuracy Define for new hires
like what state Personnel Board has done

Emphasis ON

I. Utilization and Availability Analyses and Goals
and Timetables

Qualifications
timetable

Documentation on process of selection

May include ^{statement} ~~Data~~ on incomplete indicating when will complete and forward information to HEW

INVENTORY OF AVAILABLE PERSONS

Maintain written application on file three years

Computes printed on

Dept of Commerce
Census Bureau

1970 Census of Population
Occupation Classification

U.S. DEPARTMENT OF COMMERCE
Bureau of the Census
Washington, D.C. 20233

March 1971

* 1970 Census of Population
Occupation Classification

Census
Code

PROFESSIONAL, TECHNICAL, AND KINDRED WORKERS

001	Accountants
002	Architects
	Computer specialists
003	Computer programmers
004	Computer systems analysts
005	Computer specialists, n.e.c.
	Engineers
006	Aeronautical and astronautical engineers
010	Chemical engineers
011	Civil engineers
012	Electrical and electronic engineers
013	Industrial engineers
014	Mechanical engineers
015	Metallurgical and materials engineers
020	Mining engineers
021	Petroleum engineers
022	Sales engineers
023	Engineers, n.e.c.
024	Farm management advisors
025	Foresters and conservationists
026	Home management advisors
	Lawyers and judges
030	Judges
031	Lawyers
	Librarians, archivists, and curators
032	Librarians
033	Archivists and curators
	Mathematical specialists
034	Actuaries
035	Mathematicians
036	Statisticians
	Life and physical scientists
042	Agricultural scientists
043	Atmospheric and space scientists
044	Biological scientists
045	Chemists
051	Geologists
052	Marine scientists
053	Physicists and astronomers
054	Life and physical scientists, n.e.c.
055	Operations and systems researchers and analysts

Census
Code

PROFESSIONAL, TECHNICAL, AND KINDRED WORKERS-Continued

056	Personnel and labor relations workers
	Physicians, dentists, and related practitioners
061	Chiropractors
062	Dentists
063	Optometrists
064	Pharmacists
065	Physicians, medical and osteopathic
071	Podiatrists
072	Veterinarians
073	Health practitioners, n.e.c.
	Nurses, dietitians, and therapists
074	Dietitians
075	Registered nurses
076	Therapists
	Health technologists and technicians
080	Clinical laboratory technologists and technicians
081	Dental hygienists
082	Health record technologists and technicians
083	Radiologic technologists and technicians
084	Therapy assistants
085	Health technologists and technicians, n.e.c.
	Religious workers
086	Clergymen
090	Religious workers, n.e.c.
	Social scientists
091	Economists
092	Political scientists
093	Psychologists
094	Sociologists
095	Urban and regional planners
096	Social scientists, n.e.c.
	Social and recreation workers
100	Social workers
101	Recreation workers
	Teachers, college and university
102	Agriculture teachers
103	Atmospheric, earth, marine, and space teachers
104	Biology teachers
105	Chemistry teachers
110	Physics teachers
111	Engineering teachers
112	Mathematics teachers
113	Health specialties teachers
114	Psychology teachers
115	Business and commerce teachers
116	Economics teachers
120	History teachers
121	Sociology teachers

Census
Code

PROFESSIONAL, TECHNICAL, AND KINDRED WORKERS - Continued

	Teachers, college and university-continued
122	Social science teachers, n.e.c.
123	Art, drama, and music teachers
124	Coaches and physical education teachers
125	Education teachers
126	English teachers
130	Foreign language teachers
131	Home economics teachers
132	Law teachers
133	Theology teachers
134	Trade, industrial, and technical teachers
135	Miscellaneous teachers, college and university
140	Teachers, college and university, subject not specified
	Teachers, except college and university
141	Adult education teachers
142	Elementary school teachers
143	Prekindergarten and kindergarten teachers
144	Secondary school teachers
145	Teachers, except college and university, n.e.c.
	Engineering and science technicians
150	Agriculture and biological technicians, except health
151	Chemical technicians
152	Draftsmen
153	Electrical and electronic engineering technicians
154	Industrial engineering technicians
155	Mechanical engineering technicians
156	Mathematical technicians
161	Surveyors
162	Engineering and science technicians, n.e.c.
	Technicians, except health, and engineering and science
163	Airplane pilots
164	Air traffic controllers
165	Embalmers
170	Flight engineers
171	Radio operators
172	Tool programmers, numerical control
173	Technicians, n.e.c.
174	Vocational and educational counselors
	Writers, artists, and entertainers
175	Actors
180	Athletes and kindred workers
181	Authors
182	Dancers
183	Designers
184	Editors and reporters
185	Musicians and composers
190	Painters and sculptors
191	Photographers
192	Public relations men and publicity writers
193	Radio and television announcers
194	Writers, artists, and entertainers, n.e.c.
195	Research workers, not specified
196	Professional, technical, and kindred workers --allocated

Census
Code

MANAGERS AND ADMINISTRATORS, EXCEPT FARM

201	Assessors, controllers, and treasurers; local public administration
202	Bank officers and financial managers
203	Buyers and shippers, farm products
205	Buyers, wholesale and retail trade
210	Credit men
211	Funeral directors
212	Health administrators
213	Construction inspectors, public administration
215	Inspectors, except construction; public administration
216	Managers and superintendents, building
220	Office managers, n.e.c.
221	Officers, pilots, and pursers; ship
222	Officials and administrators; public administration, n.e.c.
223	Officials of lodges, societies, and unions
224	Postmasters and mail superintendents
225	Purchasing agents and buyers, n.e.c.
226	Railroad conductors
230	Restaurant, cafeteria, and bar managers
231	Sales managers and department heads, retail trade
233	Sales managers, except retail trade
235	School administrators, college
240	School administrators, elementary and secondary
245	Managers and administrators, n.e.c.
246	Managers and administrators, except farm-- allocated

SALES WORKERS

260	Advertising agents and salesmen
261	Auctioneers
262	Demonstrators
264	Hucksters and peddlers
265	Insurance agents, brokers, and underwriters
266	Newsboys
270	Real estate agents and brokers
271	Stock and bond salesmen
280	Salesmen and sales clerks, n.e.c.
281	Sales representatives, manufacturing industries
282	Sales representatives, wholesale trade
283	Sales clerks, retail trade
284	Salesmen, retail trade
285	Salesmen of services and construction
296	Sales workers--allocated

CLERICAL AND KINDRED WORKERS

301	Bank tellers
303	Billing clerks
305	Bookkeepers
310	Cashiers

Census
Code

CLERICAL AND KINDRED WORKERS - Continued

311	Clerical assistants, social welfare
312	Clerical supervisors, n.e.c.
313	Collectors, bill and account
314	Counter clerks, except food
315	Dispatchers and starters, vehicle
320	Enumerators and interviewers
321	Estimators and investigators, n.e.c.
323	Expeditors and production controllers
325	File clerks
326	Insurance adjusters, examiners, and investigators
330	Library attendants and assistants
331	Mail carriers, post office
332	Mail handlers, except post office
333	Messengers and office boys
334	Meter readers, utilities
	Office machine operators
341	Bookkeeping and billing machine operators
342	Calculating machine operators
343	Computer and peripheral equipment operators
344	Duplicating machine operators
345	Key punch operators
350	Tabulating machine operators
355	Office machine operators, n.e.c.
360	Payroll and timekeeping clerks
361	Postal clerks
362	Proofreaders
363	Real estate appraisers
364	Receptionists
	Secretaries
370	Secretaries, legal
371	Secretaries, medical
372	Secretaries, n.e.c.
374	Shipping and receiving clerks
375	Statistical clerks
376	Stenographers
381	Stock clerks and storekeepers
382	Teacher aides, exc. school monitors
383	Telegraph messengers
384	Telegraph operators
385	Telephone operators
390	Ticket, station, and express agents
391	Typists
392	Weighers
394	Miscellaneous clerical workers
395	Not specified clerical workers
396	Clerical and kindred workers --allocated

Census
Code

CRAFTSMEN AND KINDRED WORKERS

401	Automobile accessories installers
402	Bakers
403	Blacksmiths
404	Boilermakers
405	Bookbinders
410	Brickmasons and stonemasons
411	Brickmasons and stonemasons, apprentices
412	Bulldozer operators
413	Cabinetmakers
415	Carpenters
416	Carpenter apprentices
420	Carpet installers
421	Cement and concrete finishers
422	Compositors and typesetters
423	Printing trades apprentices, exc. pressmen
424	Cranemen, derrickmen, and hoistmen
425	Decorators and window dressers
426	Dental laboratory technicians
430	Electricians
431	Electrician apprentices
433	Electric power linemen and cablemen
434	Electrotypers and stereotypers
435	Engravers, exc. photoengravers
436	Excavating, grading, and road machine operators; exc. bulldozer
440	Floor layers, exc. tile setters
441	Foremen, n.e.c.
442	Forgemen and hammermen
443	Furniture and wood finishers
444	Furriers
445	Glaziers
446	Heat treaters, annealers, and temperers
450	Inspectors, scalers, and graders; log and lumber
452	Inspectors, n.e.c.
453	Jewelers and watchmakers
454	Job and die setters, metal
455	Locomotive engineers
456	Locomotive firemen
461	Machinists
462	Machinist apprentices
	Mechanics and repairmen
470	Air conditioning, heating, and refrigeration
471	Aircraft
472	Automobile body repairmen
473	Automobile mechanics
474	Automobile mechanic apprentices
475	Data processing machine repairmen
480	Farm implement

Census
Code

CRAFTSMEN AND KINDRED WORKERS--Continued

481	Heavy equipment mechanics, incl. diesel
482	Household appliance and accessory installers and mechanics
483	Loom fixers
484	Office machine
485	Radio and television
486	Railroad and car shop
491	Mechanic, exc. auto, apprentices
492	Miscellaneous mechanics and repairmen
495	Not specified mechanics and repairmen
501	Millers; grain, flour, and feed
502	Millwrights
503	Molders, metal
504	Molder apprentices
505	Motion picture projectionists
506	Opticians, and lens grinders and polishers
510	Painters, construction and maintenance
511	Painter apprentices
512	Paperhangers
514	Pattern and model makers, exc. paper
515	Photoengravers and lithographers
516	Piano and organ tuners and repairmen
520	Plasterers
521	Plasterer apprentices
522	Plumbers and pipe fitters
523	Plumber and pipe fitter apprentices
525	Power station operators
530	Pressmen and plate printers, printing
531	Pressman apprentices
533	Rollers and finishers, metal
534	Roofers and slaters
535	Sheetmetal workers and tinsmiths
536	Sheetmetal apprentices
540	Shipfitters
542	Shoe repairmen
543	Sign painters and letterers
545	Stationary engineers
546	Stone cutters and stone carvers
550	Structural metal craftsmen
551	Tailors
552	Telephone installers and repairmen
554	Telephone linemen and splicers
560	Tile setters
561	Tool and die makers
562	Tool and die maker apprentices
563	Upholsterers
571	Specified craft apprentices, n.e.c.
572	Not specified apprentices
575	Craftsmen and kindred workers, n.e.c.

Census
Code

CRAFTSMEN AND KINDRED WORKERS--Continued

Former members of the Armed Forces
Craftsmen and kindred workers--allocated

OPERATIVES, EXCEPT TRANSPORT

601	Asbestos and insulation workers
602	Assemblers
603	Elasters and powdermen
604	Bottling and canning operatives
605	Chainmen, rodmen, and axmen; surveying
610	Checkers, examiners, and inspectors, manufacturing
611	Clothing ironers and pressers
612	Cutting operatives, n.e.c.
613	Dressmakers and seamstresses, except factory
614	Drillers, earth
615	Dry wall installers and lathers
620	Dyers
621	Filers, polishers, sanders, and buffers
622	Furnacemen, smeltermen, and pourers
623	Garage workers and gas station attendants
624	Graders and sorters, manufacturing
625	Produce graders and packers, except factory and farm
626	Heaters, metal
630	Laundry and dry cleaning operatives, n.e.c.
631	Meat cutters and butchers, exc. manufacturing
633	Meat cutters and butchers, manufacturing
634	Meat wrappers, retail trade
635	Metal platers
636	Milliners
640	Mine operatives, n.e.c.
641	Mixing operatives
642	Oilers and greasers, exc. auto
643	Packers and wrappers, except meat and produce
644	Painters, manufactured articles
645	Photographic process workers
	Precision machine operatives
	Drill press operatives
650	Grinding machine operatives
651	Lathe and milling machine operatives
652	Precision machine operatives, n.e.c.
653	Punch and stamping press operatives
656	Riveters and fasteners
660	Sailors and deckhands
661	Sawyers
662	Sewers and stitchers
663	Shoemaking machine operatives
664	Solderers
665	Stationary firemen
666	

Census
Code

OPERATIVES, EXCEPT TRANSPORT-Continued

670	Textile operatives
671	Carding, lapping, and combing operatives
672	Knitters, loopers, and toppers
673	Spinners, twistors, and winders
674	Weavers
680	Textile operatives, n.e.c.
681	Welders and flame-cutters
690	Winding operatives, n.e.c.
692	Machine operatives, miscellaneous specified
694	Machine operatives, not specified
695	Miscellaneous operatives
696	Not specified operatives
	Operatives, except transport--allocated

TRANSPORT EQUIPMENT OPERATIVES

701	Boatmen and canalmen
703	Busdrivers
704	Conductors and motormen, urban rail transit
705	Deliverymen and routemen
706	Fork lift and tow motor operatives
710	Motormen; mine, factory, logging camp, etc.
711	Parking attendants
712	Railroad brakemen
713	Railroad switchmen
714	Taxicab drivers and chauffeurs
715	Truck drivers
726	Transport equipment operatives--allocated

LABORERS, EXCEPT FARM

740	Animal caretakers, exc. farm
750	Carpenters' helpers
751	Construction laborers, exc. carpenters' helpers
752	Fishermen and oystermen
753	Freight and material handlers
754	Garbage collectors
755	Gardeners and groundskeepers, exc. farm
760	Longshoremen and stevedores
761	Lumbermen, raftsmen, and woodchoppers
762	Stockhandlers
763	Teamsters
764	Vehicle washers and equipment cleaners
770	Warehousemen, n.e.c.
780	Miscellaneous laborers
785	Not specified laborers
796	Laborers, except farm--allocated

Census
Code

FARMERS AND FARM MANAGERS

801 Farmers (owners and tenants)
802 Farm managers
806 Farmers and farm managers--allocated

FARM LABORERS AND FARM FOREMEN

821 Farm foremen
822 Farm laborers, wage workers
823 Farm laborers, unpaid family workers
824 Farm service laborers, self-employed
846 Farm laborers and farm foremen--allocated

SERVICE WORKERS, EXC. PRIVATE HOUSEHOLD

901 Cleaning service workers
902 Chambermaids and maids, except private household
903 Cleaners and charwomen
Janitors and sextons

910 Food service workers
911 Bartenders
912 Busboys
913 Cooks, except private household
914 Dishwashers
915 Food counter and fountain workers
916 Waiters
Food service workers, n.e.c., except private household

921 Health service workers
922 Dental assistants
923 Health aides, exc. nursing
924 Health trainees
925 Lay midwives
926 Nursing aides, orderlies, and attendants
Practical nurses

931 Personal service workers
932 Airline stewardesses
933 Attendants, recreation and amusement
934 Attendants, personal service, n.e.c.
935 Baggage porters and bellhops
940 Barbers
941 Boarding and lodginghouse keepers
942 Bootblacks
943 Child care workers, exc. private household
944 Elevator operators
945 Hairdressers and cosmetologists
950 Personal service apprentices
Housekeepers, exc. private household

Census
Code

SERVICE WORKERS--Continued

Personal service workers--Continued

952 School monitors
953 Ushers, recreation and amusement
954 Welfare service aides

Protective service workers

960 Crossing guards and bridge tenders
961 Firemen, fire protection
962 Guards and watchmen
963 Marshals and constables
964 Policemen and detectives
965 Sheriffs and bailiffs

Service workers, exc. private household--allocated

976

PRIVATE HOUSEHOLD WORKERS

980 Child care workers, private household
981 Cooks, private household
982 Housekeepers, private household
983 Laundresses, private household
984 Maids and servants, private household
986 Private household workers---allocated

WORKERS NOT CLASSIFIABLE BY OCCUPATION

991 Unemployed persons, last worked 1959 or earlier*
995 Occupation not reported **

* Found in experienced civilian labor force universe only.
** Used for Occupation 5-years ago item only.

UNC - Implementation of Affirmative
Action Plan

THE UNIVERSITY OF NORTH CAROLINA

General Administration

CHAPEL HILL 27514

RICHARD ROBINSON
Assistant to the President

December 5, 1973

MEMORANDUM

TO: EEO Affirmative Action Officers

FROM: Dick Robinson

This is a package of instructional materials developed for use at the Chapel Hill campus with reference to the critical matter of insuring close observance and documentation of affirmative action steps in connection with major personnel decisions (e.g., initial hire, renewal, termination); this may be a useful model for adaptation to other campus efforts.



THE UNIVERSITY OF NORTH CAROLINA
AT
CHAPEL HILL
27514

September 18, 1973

N. FEREBEE TAYLOR
Chancellor

TO: Deans, Directors, and Chairmen

FROM: Ferebee Taylor, Chancellor
J. Charles Morrow, Provost
Cecil G. Sheps, Vice Chancellor for Health Sciences
Douglass Hunt, Vice Chancellor for Administration
and Affirmative Action Officer

SUBJECT: Implementation of Affirmative Action Plan

Each of you has received a copy of the University's Affirmative Action Plan, which was adopted by the Chancellor effective July 1, 1973. The Plan is a pledge of our efforts, and a statement of the means, to achieve the goals of equal employment opportunity in the University without discrimination because of race, color, religion, sex, or national origin. While it is a response to legal requirements, it is also a re-affirmation of the University's commitment to equality of opportunity for all who work here.

A Memorandum from the Chancellor dated September 14 informed you of the appointment of Mr. Douglass Hunt, Vice Chancellor for Administration, as the University's Affirmative Action Officer. It also informed you of the appointment, and supplied the names of the members, of the University's Affirmative Action Advisory Committee.

The final paragraph of the Summary (pages ii-iii) of the Affirmative Action Plan reads as follows:

4. The recruitment procedures of the schools and departments of the University will be broadened with the objective of bringing to their attention more black and female candidates for consideration. The appointment, promotion, reappointment, and salary-setting procedures will be more carefully carried out and better documented in order to ensure the fact and provide the evidence of fairness in these actions and to enable the University to respond to inquiries that may be made with respect to them.

As one step in discharging the responsibilities undertaken by the University in its Affirmative Action Plan, the following procedures will be in effect until further notice:

(A) EPA Personnel Actions

(1) Initial EPA Appointments

Every PD-7 form which recommends the appointment of an EPA employee, whether faculty or non-faculty, for a term of twelve months or more (in the case of faculty members, for a stated term of one academic year or more), is to be accompanied by a separate signed written statement indicating how and to what extent affirmative action steps have been taken in arriving at the recommendation. The statement is to set forth the following:

- (a) the name, race, and sex of the candidate being recommended;
- (b) the steps taken to identify other qualified persons -- of either sex or any race -- for the appointment;
- (c) the name, race, and sex of each person considered but not recommended for the appointment; and
- (d) the reasons for recommending the appointment of the candidate rather than any of the other persons considered for the appointment.

(2) EPA Reappointments

Every PD-7 form which recommends the reappointment of an EPA employee, whether faculty or non-faculty, as of the end of a stated term of employment of twelve months or more (in the case of faculty members, a stated term of one academic year or more) is to be accompanied by a separate signed written statement which sets forth the following:

- (a) the name, race, and sex of the candidate being recommended;
- (b) the name, race, and sex of each person within the same department (or non-departmentalized School) who is in the same faculty rank, or EPA non-faculty category, but is of a different race or sex from the recommended candidate and who has been (during the preceding six months) or is expected to be (during the succeeding six months) recommended for non-renewal instead of for reappointment; and
- (c) the reasons for recommending the reappointment of the candidate rather than any of the other persons named.

(3) EPA Non-renewals

Recommendations for the non-renewal of an EPA employee, whether faculty or non-faculty, as of the end of a stated term of employment of twelve months or more (in the case of faculty members, a stated term of one academic year or more) are to be made in every case by a PD-7 form which is to be accompanied by a separate signed written statement which sets forth the following:

- (a) the name, race, and sex of the person being recommended for non-renewal;
- (b) the name, race, and sex of each person within the same

- department (or non-departmentalized School) who is in the same faculty rank, or EPA non-faculty category, but is of a different race or sex from the person recommended for non-renewal and who has been (during the preceding six months) or is expected to be (during the succeeding six months) recommended for reappointment; and
- (c) the reasons for recommending the person for non-renewal rather than any of the other persons named.

(4) EPA Terminations

Every PD-7 form recommending the termination of a non-faculty EPA employee (a) prior to age 65, and (b) before the end of a stated period of employment of twelve months or more, or when the employment was for an indefinite term, and (c) for a reason other than resignation, retirement, or death is to be accompanied by a separate signed written statement which sets forth the following:

- (a) the name, race, and sex of the person being recommended for termination;
- (b) the name, race, and sex of each person within the same department (or non-departmentalized School) who is in the same EPA non-faculty category but is of a different race or sex from the person recommended for termination and who has not been (during the preceding six months) or is not expected to be (during the succeeding six months) recommended for such termination; and
- (c) the reasons for recommending the person for termination rather than any of the other persons named.

(5) Faculty Promotions

Every PD-7 form which recommends the promotion of a faculty member (Instructor, Assistant Professor, or Associate Professor) to a higher faculty rank is to be accompanied by a separate signed written statement which sets forth the following:

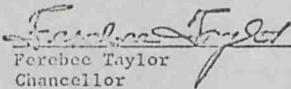
- (a) the name, race, and sex of the candidate being recommended;
- (b) the name, race, and sex of each faculty member within the same department (or non-departmentalized School) who is in the same faculty rank but is of a different race or sex from the recommended candidate and who has not been (during the preceding six months) or is not expected to be (during the succeeding six months) recommended for promotion; and
- (c) the reasons for recommending promotion of the candidate rather than any of the other persons named.

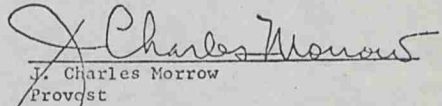
The separate signed written statements specified in paragraphs (1) through (5) above will be referred to the Affirmative Action Officer by the official who receives them from the department or School (e.g., the Provost or the Vice Chancellor for Health Sciences); and each recommendation will be forwarded for further action only after the Affirmative Action Officer has expressed an opinion as to whether it appears that the recommendation was arrived at in accordance with principles and objectives of the Affirmative Action Plan.

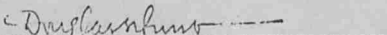
(B) Staff (SPA) Personnel Actions

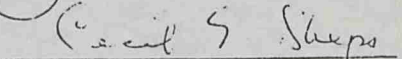
The University Personnel Office will maintain records of decisions and recommendations of all University Schools, departments, and other units with respect to the hiring, promotion, transfer, demotion, and termination of SPA applicants and employees, by race and sex, and will make quarterly reports of results to the Affirmative Action Officer, who will transmit to one or more of the responsible University officials details of those reports with his recommendations for corrective action where indicated.

It is clear that the University cannot achieve the goals of affirmative action toward equality of employment opportunity without the positive effort of all those involved at every level of decision-making with respect to employment. We solicit and expect that effort from you and all others in positions of such responsibility.


Ferebee Taylor
Chancellor


J. Charles Morrow
Provost


Douglass Hunt
Vice Chancellor for Administration
and Affirmative Action Officer


Cecil G. Sheps
Vice Chancellor for Health Sciences

Copy to: Members of the Affirmative Action
Advisory Committee
The University Gazette

AFFIRMATIVE ACTION CHECKLIST
EPA PERSONNEL ACTIONS

(The following checklist is offered to assist you in evaluating the steps you have taken prior to recommending a particular EPA personnel action and in writing your Affirmative Action statement on the recommended action. Though you are free to use this checklist in reporting on your recommended action, it is offered not as the required form an Affirmative Action statement should take, but rather as a guide to factors you should consider generally in EPA personnel actions and specifically in writing your Affirmative Action statements.)

I. INITIAL APPOINTMENTS

A. Position to be Filled

- 1. Availability of position known (date). Date on which availability of position became known
- 2. Actual availability date. Date on which position actually became available
- 3. Date on which position is proposed to be filled
- 4. Minimum qualifications for position

B. Recommended Appointment

- 1. Name of person recommended to fill position
- 2. School, department
- 3. Title of appointment (Assistant Professor, Research Associate, etc.)
- 4. Recommended salary
- 5. Sex
- 6. Race

C. Record of Recruitment Efforts (see text at end of checklist)

- 1. Availability information (include specific efforts made to obtain information and statistics broken down by race, and within each race, by sex)
- 2. Publicizing the position
 - a. Letters (to institutions, associations, individuals, etc.; where, when, magnitude of response)
 - b. Verbal communications, formal contacts made at professional meetings (to whom, response)
 - c. Advertisements (where, when, magnitude of response)
 - d. Telephone calls (to whom, response)
 - e. Other sources
- 3. Record of applicants
 - a. Suggestions by individuals (include names, whether they were interviewed, whom they were suggested by, their sex and race, and the disposition, i.e., not qualified; not interested because of low salary, location, duties, etc.; less qualified than others recommended; etc.)

- ___ b. Direct applicants (include same information as in 3(a) above)
- ___ c. Other (include same information as in 3(a) above)
- ___ d. Summary total (include total number of applicants broken down by race, and within each race, broken down by sex, and include total number interviewed broken down in the same fashion)
- ___ e. Comparison of availability information in C(1) above to summary total in C3(a) above, and explanation of differences in the figures
- ___ 4. Individuals considered (include for each individual considered the name, sex, race, source of application, name of person or committee who reviewed the application, the date of the review, and comments about the application)

D. Recommended Selection

- ___ 1. Justification (indicate why this person was chosen instead of other individuals considered -- be specific)
- ___ 2. List all committees and/or individuals who reviewed and approved the recommendation
- ___ 3. Any other comments on the selection process and/or the individual recommended.

II. REAPPOINTMENTS, NON-RENEWALS, TERMINATIONS, AND PROMOTIONS

A. Recommended Action

- ___ 1. Type of action (reappointment, non-renewal, termination, promotion)
- ___ 2. Name of person with respect to whom action is recommended
- ___ 3. School, department
- ___ 4. Title of appointment, if applicable
- ___ 5. Recommended salary, if applicable
- ___ 6. Sex
- ___ 7. Race

B. Individuals Considered

- ___ 1. With respect to EPA reappointments, the name, race and sex of each person within the same department who is in the same year of service with this University in the same faculty rank, or EPA non-faculty category, but is of a different race or sex from the recommended candidate and who has been (during the preceding six months) or is expected to be (during the succeeding six months) recommended for non-renewal instead of for reappointment; or
- ___ 2. With respect to EPA non-renewals, the name, race and sex of each person within the same department who is in the same faculty rank, or EPA non-faculty category, but is of a different race

or sex from the person recommended for non-renewal and who has been (during the preceding six months) or is expected to be (during the succeeding six months) recommended for reappointment; or

- ___ 3. With respect to EPA terminations, the name, race and sex of each person within the same department who is in the same EPA non-faculty category but is of a different race or sex from the person recommended for termination and who has not been (during the preceding six months) or is not expected to be (during the succeeding six months) recommended for such termination; or
- ___ 4. With respect to faculty promotions, the name, race and sex of each faculty member within the same department who is in the same faculty rank but is of a different race or sex from the recommended candidate and who has not been (during the preceding six months) or is not expected to be (during the succeeding six months) recommended for promotion

C. Person with respect to whom Action is Recommended

- ___ 1. Justification (indicate why this person was chosen for this personnel action instead of other individuals similarly situated -- be specific)
- ___ 2. List all committees and/or individuals who reviewed and approved the recommended action
- ___ 3. Any other comments on the action recommended

AFFIRMATIVE ACTION CHECKLIST
EXPLANATORY NOTES

Recruiting Efforts

The first goal of your recruiting efforts is to produce a pool of qualified applicants representative by race and sex of the complete pool previously reported in your availability statistics. If your recruiting efforts produce an unrepresentative pool, you must explain why (as, for example, that you found no qualified women able or willing to accept appointment).

Methods of publicizing a position are listed in the checklist. No single method is necessarily sufficient, nor will the use of all listed methods in combination always produce a representative pool. You are expected to use your best professional judgment in choosing and inventing processes which, by producing the most representative pool of qualified applicants, will best implement the commitment of the University and your department to Affirmative Action.

Although advertising is not required, it is strongly encouraged in any case in which it is likely to produce qualified applicants who might not otherwise have been discovered. In the academic world disapproval of position advertising is breaking down under the increasing competition to identify and recruit minority and female applicants, and the number of those who read position advertisements and respond to them is rapidly increasing. If your policy is not to advertise, please reconsider it in the light of our commitment to Affirmative Action and the demands of competing effectively against other universities for such highly qualified blacks and women as may be available for appointment.

"Visiting" Category of Appointments

A recommendation for an appointment to a "Visiting" category must be accompanied by a statement explaining whether the appointment is clearly a temporary one, or whether the "Visiting" status is being used as a recruiting device. If the latter is the case, this statement must be accompanied by an Affirmative Action statement, to which the attached checklist refers. In other words, the same kind of search a department makes for an initial appointment must be made for a "Visiting" appointment, if the purpose of the visit is possibly related to recruiting that person to this University. If the needs of the department change while a clearly temporary visitor is employed here, and if the department then wishes to consider the visitor for possible permanent appointment, that person must be considered as only one member of the potential pool of applicants. When someone is finally recommended for this permanent appointment, the usual Affirmative Action statement must be filed.