HR UL Meeting
OFCCP Changes for Individuals with Disabilities and Protected Veterans
March 19, 2014
• New Regulations
• Voluntary Data Collection
  • Applicant Experience
  • Employee Self Service
• Paper Hire Process
• Implementation
• Communication
• Help Resources
• Questions
New Regulations

• Department of Labor, Office of Federal Contract Compliance (OFCCP)
  • Section 503 Persons with Disabilities
  • Vietnam Era Veterans’ Readjustment Assistance Act (VEVRAA)
• http://www.dol.gov/ofccp/
New Regulations

• Final Rule effective March 24, 2014
• Requires pre and post offer invitation to voluntarily self identify
• Develop, implement and document recruiting strategies
• Insure EEO clause is compliant with new OFCCP language
New Regulations

- Establishes utilization goals:
  - 7% for individuals with disabilities
  - 8% for protected veterans
- Survey every five years with a reminder to update midway
- University Affirmative Action Plan to report and evaluate data and revise recruitment efforts annually as needed
• Pre-Offer invitation to job applicant is broad and does not request the disclosure of a particular category of protected veteran

• Post-Offer invitation to the selected candidate collects more refined data regarding the specific category or categories of protected veteran
### Veteran Data Collection in M-Pathways

<table>
<thead>
<tr>
<th>Applicant Selection (eRecruit)</th>
<th>Employee Self Service Selection</th>
</tr>
</thead>
<tbody>
<tr>
<td>I identify as one or more of the classifications of protected veterans listed below:</td>
<td>I belong to the following classifications of protected veteran (choose all that apply):</td>
</tr>
<tr>
<td>- Disabled Veteran</td>
<td>- Armed Forces Service Medal Veteran</td>
</tr>
<tr>
<td>- Recently Separated Veteran</td>
<td>- Veteran of the Vietnam-era</td>
</tr>
<tr>
<td>- Active Duty Wartime or Campaign Badge Veteran</td>
<td>- Disabled Veteran</td>
</tr>
<tr>
<td>- Armed Forces Service Medal Veteran</td>
<td>- Recently Separated Veteran</td>
</tr>
<tr>
<td>I am not a protected veteran</td>
<td>I am a protected veteran, but I choose not to self-identify the classifications to which I belong</td>
</tr>
<tr>
<td>I decline to provide a response to the veteran information request</td>
<td>I am not a protected veteran</td>
</tr>
<tr>
<td></td>
<td>I decline to provide a response to the veteran information request</td>
</tr>
</tbody>
</table>
• New federal form available for voluntary self identification
• Electronic form displays in eRecruit to all internal and external job applicants for regular and non-student temporary job openings
• Collection of data is not required for students
• Data collection is requested
  • At time of application for internal and external applicants
  • Post offer for selected candidate, but before first day of work
  • Every five years during employment
  • Once between each five year employment period

• New email sent to selected internal candidate when hire is complete, invites candidate to employee self service to update information
Voluntary Self-Identification of Disability

Self-identification is voluntary and takes just a few seconds of your time. Please complete this form and click Continue below to save and submit the information.

Why are you being asked to complete this form?

Because we do business with the government, we must reach out to, hire, and provide equal opportunity to qualified people with disabilities. To help us measure how well we are doing, we are asking you to tell us if you have a disability or if you ever had a disability. Completing this form is voluntary, but we hope that you will choose to fill it out. If you are applying for a job, any answer you give will be kept private and will not be used against you in any way.

If you already work for us, your answer will not be used against you in any way. Because a person may become disabled at any time, we are required to ask all of our employees to update their information every five years. You may voluntarily self-identify as having a disability on this form without fear of any punishment because you did not identify as having a disability earlier.

How do I know if I have a disability?

You are considered to have a disability if you have a physical or mental impairment or medical condition that substantially limits a major life activity, or if you have a history or record of such an impairment or medical condition.

Disabilities include, but are not limited to:

- Blindness
- Autism
- Deafness
- Cerebral palsy
- Cancer
- HIV/AIDS
- Diabetes
- Schizophrenia
- Epilepsy
- Muscular dystrophy
- Bipolar disorder
- Major depression
- Multiple sclerosis (MS)
- Post-traumatic stress disorder (PTSD)
- Obsessive compulsive disorder
- Impairments requiring the use of wheelchair
- Intellectual disability (previously called mental retardation)

Please check one of the boxes below:

- Yes, I have a disability (or previously had a disability)
- No, I don’t have a disability
- I don’t wish to answer

Reasonable Accommodation Notice

Federal law requires employers to provide reasonable accommodation to qualified individuals with disabilities. Please tell us if you require a reasonable accommodation to apply for a job or to perform your job. Examples of reasonable accommodation include making a change to the application process or work procedures, providing documents in an alternate format, using a sign language interpreter, or using specialized equipment.

Section 503 of the Rehabilitation Act of 1973, as amended. For more information about this form or the equal employment obligations of federal contractors, visit the U.S. Department of Labor’s Office of Federal Contract Compliance Programs (OFCCP) website at www.dol.gov/ofccp.

PUBLIC BURDEN STATEMENT: According to the Paperwork Reduction Act of 1995 no persons are required to respond to a collection of information unless such collection displays a valid OMB control number. This survey should take about
• Faculty and Other Academic Appointment Paper Forms
  • Updated: 39006 Appointment Activity Record
  • Updated: 39007 Self Identification Form
  • Added: New Disability Self ID Form
• If your School or College has a side system that collects this data, please contact the Office for Institutional Equity for update requirements
### Paper Hire Process

#### Appointment Activity Record

This form is to be used for teaching and research staff, executive officers, directors of various teaching, research, and library units, and curators. After obtaining the appropriate approvals, submit it to Human Resource Records and Information Services along with the Instructional Hiring materials. After obtaining approvals, Flint and Dearborn units submit their materials to their regional HR office. Details of the selected candidate’s appointment should be provided on the Appointment Request Form (36400).

**Job Posting Number:**

**Department:**

<table>
<thead>
<tr>
<th>Name of Selected Candidate</th>
<th>Ethnicity/Race</th>
<th>Gender</th>
<th>Protected Veteran</th>
<th>Disabled</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>Yes</td>
<td>No</td>
<td></td>
</tr>
</tbody>
</table>

**Please provide the following information for the selected candidate.**

**Name of Interviewed Candidate but not Selected Candidate**

<table>
<thead>
<tr>
<th>Name of Interviewed Candidate but not Selected Candidate</th>
<th>Ethnicity/Race</th>
<th>Gender</th>
<th>Protected Veteran</th>
<th>Disabled</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>Yes</td>
<td>No</td>
<td></td>
</tr>
</tbody>
</table>

**Please provide the following information for any candidates that were interviewed but not selected for the position.**

**ETHNICITY - Summary of all candidates (including the selected candidate).**

<table>
<thead>
<tr>
<th>Candidate Outcome</th>
<th>Gender</th>
<th>Protected Veteran</th>
<th>Disabled</th>
</tr>
</thead>
<tbody>
<tr>
<td>Selected</td>
<td>Male</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Female</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Unknown</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Interviewed</td>
<td>Male</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Female</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Unknown</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Rejected Offer</td>
<td>Male</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Female</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Unknown</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Withdraw</td>
<td>Male</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Female</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Unknown</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Not Interviewed</td>
<td>Male</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Female</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Unknown</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Not Qualified</td>
<td>Male</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Female</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Unknown</td>
<td>Yes</td>
<td></td>
</tr>
</tbody>
</table>

**Number on Search Committee (if applicable):**

<table>
<thead>
<tr>
<th>Minority</th>
<th>Non-Minority</th>
<th>Male</th>
<th>Female</th>
<th>Local</th>
<th>State</th>
<th>National</th>
</tr>
</thead>
</table>

**Scope of Search:**

- [ ] Local
- [ ] State
- [ ] National

---

12
SELF-IDENTIFICATION FORM
ANN ARBOR CAMPUS

Last Name: ____________________________ First Name: ____________________________ Middle Name: ____________________________

Date: ____________________________ University Department: ____________________________

U-M Job Requisition Number: ____________________________ Gender: [ ] Male [ ] Female

RACE OR ETHNICITY
The information requested below is optional and will not be used for admissions or hiring purposes. It will be used to satisfy federal reporting requirements and may be used for other purposes allowed by law.

1. Please indicate whether you consider yourself to be Hispanic or Latino.
   [ ] No, not Hispanic or Latino.
   [ ] Yes, Hispanic or Latino: A person of Cuban, Mexican, Chicano, Puerto Rican, South or Central American or other Spanish culture or origin, regardless of race.

2. In addition, select one or more of the following racial categories to describe yourself:
   [ ] American Indian or Alaska Native: A person having origins in any of the original peoples of North and South America (including Central America), and who maintains Tribal affiliation or community attachment.
   [ ] Asian: A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
   [ ] Black or African American: A person having origins in any of the black racial groups of Africa.
   [ ] Native Hawaiian or Other Pacific Islander: A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
   [ ] White: A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.

3. How did you learn of this position? (Choose only one.)
   [ ] Vacancy notice, bulletin board, professional conference: ____________________________
   [ ] Newspaper, magazine, journal: ____________________________
   [ ] Contacted/nominated by: ____________________________
   [ ] Internet: ____________________________
   [ ] Other: ____________________________

4. Please check one of the boxes below concerning veteran status:
   [ ] Yes, I am a protected veteran. [ ] No, I am not a protected veteran. [ ] I do not wish to answer.

5. Please print and complete Form CC-305 Voluntary Self-Identification of Disability form by accessing the following link:

Please return completed forms HR39907 and CC-305 in the enclosed stamped, self-addressed envelope to the Office of Institutional Equity, The University of Michigan, 2072 Administrative Services Building, 1009 Greene Street, Ann Arbor, MI 48109-1432.

Form HR39907 Revised 4/2014 Available at: http://www.hr.umich.edu/hris/forms/pdfs/selfida2.pdf
Voluntary Self-Identification of Disability

Why are you being asked to complete this form?

Because we do business with the government, we must reach out to, hire, and provide equal opportunity to qualified people with disabilities. To help us measure how well we are doing, we are asking you to tell us if you have a disability or if you ever had a disability. Completing this form is voluntary, but we hope that you will choose to fill it out. If you are applying for a job, any answer you give will be kept private and will not be used against you in any way.

If you already work for us, your answer will not be used against you in any way. Because a person may become disabled at any time, we are required to ask all of our employees to update their information every five years. You may voluntarily self-identify as having a disability on this form without fear of any punishment because you did not identify as having a disability earlier.

How do I know if I have a disability?

You are considered to have a disability if you have a physical or mental impairment or medical condition that substantially limits a major life activity, or if you have a history or record of such an impairment or medical condition.

Disabilities include, but are not limited to:

- Blindness
- Deafness
- Cerebral palsy
- Cancer
- HIV/AIDS
- Diabetes
- Schizophrenia
- Epilepsy
- Muscular dystrophy
- Autism
- Cerebral palsy
- Major depression
- Multiple sclerosis (MS)
- Nonsensical limbs or partially missing limbs
- Bipolar disorder
- Obsessive compulsive disorder
- Impairments requiring the use of a wheelchair
- Intellectual disability (previously called mental retardation)
- Post-traumatic stress disorder (PTSD)
- Impairments requiring the use of a wheelchair
- Intellectual disability (previously called mental retardation)

Please check one of the boxes below:

☐ YES, I HAVE A DISABILITY (or previously had a disability)
☐ NO, I DON'T HAVE A DISABILITY
☐ I DON'T WISH TO ANSWER

Your Name

Today's Date
• New columns added to identify IWD and Veteran disclosure on individual applicant
• Percentage of total applicant pool and of applicants that disclosed, added to summary data for IWD and Veterans
• Link to updated Diversity Recruitment resources

• Future Enhancement: Summary data includes actual availability information (No need to link to Availability Data Data Report to compare percentages)
Total Applicants Reporting Gender as Female: 69  
Total Applicants Reporting as Minority: 36  
Total Applicants Reporting as Disabled: 8  
Total Applicants Reporting as Protected Veteran: 6  
Total Number of Applicants: 89

Of Total Applicant Pool  
Comparison to Availability Data  
Percentage Females: 77.5%  
Percentage Females: 60.5%  
Percentage Minorities: 40.4%  
Percentage Minorities: 19.5%  
Institutional Utilization Goal  
Percentage Disabled: 9.0%  
Percentage Protected Veteran: 6.7%  

Of Applicants Reported  
Comparison to Availability Data  
Percentage Females: 83.1%  
Percentage Females: 60.5%  
Percentage Minorities: 44.4%  
Percentage Minorities: 19.5%  
Institutional Utilization Goal  
Percentage Disabled: 12.3%  
Percentage Protected Veteran: 9.2%  

Availability comparison data is compiled from the Affirmative Action Availability information published by the Office of Institutional Equity and applies to AA goals for females and minorities.  
Institutional utilization goals are published by the Office of Federal Contract Compliance Programs and are campus wide goals that apply to individuals with disabilities (IWD) and those who identify as having a protected veteran status.  
Questions can be directed to the University of Michigan Office of Institutional Equity (OIE) http://hr.umich.edu/oie/office.html  
Additional diversity outreach resources can be found at  
http://hr.umich.edu/empserv/department/diversity/index.html
Diversity Recruitment Resources

- **http://hr.umich.edu/empserv/diversity/**
- **Based on a six-step process**
  1. Building Awareness and Knowledge
  2. Developing Your Recruitment Strategy
  3. Investigating Sourcing Options
  4. Creating and Assessing the Diversity of your Applicant Pool
  5. Screening and Selecting the Right Candidate
  6. Planning for Employee Onboarding and Retention

- **Contact:** Staff.Diversity.Recruiting@umich.edu
• Changes for job applicants and new employee self service scheduled for April 9, 2014

• Current employee survey to begin in late April through October, to direct the 2015 Affirmative Action Plan

• Additional updates on employee survey at future UL meeting
Key Messages
- Self ID required for job applicants (pre and post offer), and current employees

Utilization Goals
Recruitment efforts
Updates to business process for hires completed on paper forms, and through eRecruit
• Planned Communications
  • 3D Message (mid-late April)
  • ITS Inform Message (April)
  • University Record Article (4/14/2014)
  • Unit Liaison Meeting (3/19/14)
  • HRCG and Academic HR Unit Rep Meeting (3/19-24/2014)
Policy Questions:
Office for Institutional Equity

Job Applicant Questions:
HR Payroll Service Center 734-615-2000

Technical Questions/Issues:
ITS Service Center
764-HELP or 4HELP@umich.edu
QUESTIONS?

??????