



UNIVERSITY OF WISCONSIN-MILWAUKEE

**EXECUTIVE ORDER 11246
AFFIRMATIVE ACTION PLAN**

October 31, 2021

Includes Personnel Activity for November 1, 2020 to October 31, 2021

University of Wisconsin-Milwaukee
Executive Order 11246
Affirmative Action Plan
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INTRODUCTION

A. Preface

The University of Wisconsin-Milwaukee (UWM) is pleased to publish this affirmative action plan (AAP). This AAP discusses the current actions being taken—and future actions planned to be taken—by UWM to provide equal employment opportunity and affirmative action for those classes of applicants and employees covered by Executive Order 11246. This AAP also reviews recent personnel actions as part of an assessment of UWM's programs meant to provide opportunities to applicants and employees. UWM is fully committed to principles of equal employment opportunity and affirmative action and considers the development of its AAP an annual opportunity to identify potential issues and to improve its employment processes.

B. Terminology

This AAP uses the terminology found in Executive Order 11246 and the regulations that implement Executive Order 11246. Executive Order 11246 requires federal contractors and subcontractors to take affirmative action to employ minorities and women and to provide equal opportunity in all facets of employment to applicants and employees, regardless of race, ethnicity, sex, color, religion, national origin, sexual orientation, or gender identity.

The federal regulations implementing Executive Order 11246 are found at 41 CFR 60. Those regulations include certain terms—such as “placement goal,” “problem area,” and “action plans”—which UWM uses in this AAP to describe its personnel activities and objectives. UWM's use of these terms should not be interpreted as an admission that any class or group of employees or job applicants has been discriminated against in any way by the university; instead, UWM is simply using the terminology established by Executive Order 11246's implementing regulations.

Within this AAP, any reference to “this AAP” refers to this entire affirmative action plan. Any reference to “the current AAP year” refers to the year covered by this affirmative action plan: November 1, 2021 through October 31, 2022. Any reference to the “last AAP year” refers to the year covered by the prior affirmative action plan: November 1, 2020 through October 31, 2021.

C. Placement Goals Defined

UWM has established placements goals as a part of this AAP. Placement goals are a standard part of every affirmative action plan; these goals are meant to effectuate the provisions of Executive Order 11246 and are set using a statistical process established by the U.S. Department of Labor. Placement goals are not intended to be rigid, inflexible quotas, but instead are intended to be targets reasonably attainable through good faith

efforts. The fact that UWM has established goals does not require UWM to hire, promote, or retain unqualified or marginally-qualified individuals. Instead, placement goals are a mechanism to effectuate the principles of equal opportunity and affirmative action and are used as a prompt to ensure that the university is advertising broadly in order to reach the best qualified candidates in its selection practices.

D. The University of Wisconsin System

UWM is a part of the University of Wisconsin System (UW System). The UW System is one of the largest systems of public higher education in the country, serving approximately 163,000 students each year and employing approximately 40,000 faculty and staff statewide. The UW System is comprised of 13 four-year institutions; until July 1, 2018, it also included 13 two-year schools known as UW Colleges and the statewide UW-Extension. Effective July 1, 2018, the UW System was restructured such that each of the two-year UW College campuses became affiliated as a branch campus with one of the four-year UW System universities, while UW-Extension joined with the University of Wisconsin-Madison and UW System Administration. As part of this restructuring, the campuses formerly known as UW-Waukesha and UW-Washington County became affiliated as branch campuses of UWM. These campuses were rebranded “University of Wisconsin-Milwaukee at Waukesha” and “University of Wisconsin-Milwaukee at Washington County.”

The UW System is governed by an 18-member Board of Regents. The Board appoints the President of the UW System and the Chancellors of the 13 universities and establishes a regulatory framework within which the individual institutions must operate.

The mission of the UW System is to develop human resources, to discover and disseminate knowledge, to extend knowledge and its application beyond the boundaries of its campuses, and to serve and stimulate society by developing in students heightened intellectual, cultural, and humane sensitivities, scientific, professional and technological expertise, and a sense of purpose. Inherent in this broad mission are methods of instruction, research, extended training, and public service designed to educate people and to improve the human condition. Central to every purpose of the UW System is the search for truth.

The UW System is a State agency and, as such, operates under mandates established by the State of Wisconsin. Governance of the system, budget allocations for the system schools, and other major operational aspects of the UW System are heavily influenced—and in some cases controlled—by actions of the state legislature and the Governor’s office. While the UW System has been given a certain level of autonomy to institute policies and to make fiscal decisions, final authority over the UW System is vested in the State of Wisconsin.

E. The University of Wisconsin-Milwaukee

UWM is the second-largest university in the UW System, with more than 24,000 students participating in over 200 different academic degree programs through 15 schools and colleges. UWM has approximately 3400 permanent employees who provide various services to students, the university, and the community at-large. The UWM Chancellor serves as the chief executive officer for the university.

Structurally, UWM is organized into a series of divisions, schools, and colleges. The divisions are: Academic Affairs (which also houses the Division of Enrollment Management and Student Success); Student Affairs; Finance and Administrative Affairs; and General Education Administration, which is composed of three divisions of its own: University Relations; the Division of Diversity, Equity, and Inclusion; and Development and Alumni Relations.

Academic Affairs, Finance and Administrative Affairs, University Relations, the Division of Diversity, Equity, and Inclusion, Student Affairs, and Development and Alumni Relations are each headed by a vice chancellor. The largest of the divisions, Academic Affairs, contains UWM's schools and colleges, and the Vice Chancellor of Academic Affairs acts as Provost for the university. The six vice chancellors report directly to the Chancellor and are charged with overseeing various activities in their divisions and areas of responsibility.

All but one of UWM's schools and colleges is headed by a Dean. (The School of Continuing Education is headed by a Deputy to the Provost.) The schools and colleges contain faculty members and various other instructional staff members along with other employees who support the education activities occurring in the schools and colleges. A complete list of these schools and colleges is as follows:

- College of Health Sciences
- School of Architecture and Urban Planning
- Sheldon B. Lubar School of Business
- School of Education
- College of Engineering and Applied Sciences
- Peck School of the Arts
- School of Freshwater Sciences
- Graduate School
- College of Letters and Science
- School of Information Studies
- College of Nursing
- Joseph J. Zilber School of Public Health
- Helen Bader School of Social Welfare
- School of Continuing Education
- College of General Studies (UWM at Waukesha and UWM at Washington County)

F. Employees at the University of Wisconsin-Milwaukee

1. Overview

UWM employees are divided into four basic groups: faculty, academic staff, limited appointees, and university staff. All employee positions are governed by Chapter 36 of the Wisconsin statutes, Board of Regents policy, and UW System University Personnel Policies. While part of the authority for oversight of the UW System schools is vested in the Board of Regents, faculty and academic staff share in the governance of their respective universities pursuant to the provisions of Wis. Stat. § 36.09.

2. Faculty

“Faculty” are defined in Wis. Stat. § 36.05(8) as those persons who hold the rank of Professor, Associate Professor, Assistant Professor, or Instructor in an academic department (or its functional equivalent) at a university in the UW System. Personnel matters involving faculty members—including appointment, promotion, discipline, and dismissal—are generally governed by the policies and procedures established by the faculty. UWM is bound by these policies and procedures. Department-level executive committees comprised entirely of tenured faculty members initiate most decisions pertaining to the recruitment, retention, compensation and termination of faculty in their department. Faculty members may have probationary status or may hold tenured status where employment can be terminated only for cause.

3. Academic Staff

“Academic staff” are defined in Wis. Stat. § 36.05(1) as those persons who hold professional and administrative positions “with duties and appointment types that are primarily associated with higher education institutions.” Generally, academic staff members hold exempt positions. UWM’s academic staff members have the primary responsibility for the formulation and review of policies and procedures concerning the academic staff. UWM administration is bound by personnel policies and procedures developed by the academic staff.

Academic staff members may have an indefinite appointment, where employment can be terminated only for cause, or a probationary appointment, where the academic staff member is on a path to receiving indefinite status after having their contract renewed for seven years. There are also certain academic staff members who are on fixed-term contracts where there is no expectation of continued employment beyond the contractual term. As is the case with faculty positions, there are various levels for academic staff classifications through which an academic staff member may advance.

There are three distinct types of academic staff members employed by UWM: instructional academic staff; non-instructional academic staff; and research academic staff. *Instructional academic staff members* are directly involved in instructional activities; they

may serve as a resource for faculty members or they may independently provide instruction to students. Instructional academic staff members work in classrooms, in clinical settings, or in other settings where instruction is occurring. Instructional academic staff members have no expectation of moving to faculty positions, and they are not governed by the rules associated with faculty positions.

Non-instructional academic staff serve in a variety of roles throughout the university. For example, they may act as academic advisors, financial analysts, academic librarians, or media specialists. Certain members of the academic staff may have supervisory responsibilities on behalf of the university.

Research academic staff members conduct and provide program support for the research functions of the university. These staff members hold titles such as scientist, research specialist, research analyst, or research program manager.

4. Limited Appointee

UWM has a certain number of employees who serve in “limited appointment” positions. A “limited appointment” is defined in Wis. Stat. § 36.17 as an appointment that continues “at the pleasure” of the Board of Regents. The statute provides that the following positions are limited appointment positions for all UW System institutions: Chancellor, Provost, Vice Chancellor, Associate Chancellor, Assistant Chancellor, Associate Vice Chancellor, Assistant Vice Chancellor, College Campus Dean, “and such other administrative positions as the [Board of Regents] determines at the time of the appointment.” At UWM, the positions of Associate Dean, Assistant Dean, Academic Program Director, and Department Chair are also considered limited appointments.

Employees serving in these limited appointment positions create and execute policy for UWM and make executive decisions in consultation with appropriate shared governance bodies. There is no explicit term of service for employees in limited appointment positions; these employees may be removed from their positions at the sole discretion of the relevant appointing authority. At times, employees serving in limited appointment positions are referred to as “limited appointees” or “limited title appointees.” The use of the term “limited appointment” does not refer to limitations in the authority for these employees, but rather to limitations on the rights an employee has to continue serving in such a position.

5. University Staff

“University staff” are defined in Wis. Stat. § 36.05(15) as all employees of the UW System other than faculty, academic staff, persons whose employment is a necessary part of their training, student assistants, and student hourly help. According to UW System Administrative Policy 1251, university staff generally hold non-exempt positions.

Until July 2015, university staff were referred to as “classified staff” and primarily held positions that were controlled by the provisions of Chapter 230 in the Wisconsin statutes. Chapter 230 provides civil service protections to State employees and imposes certain rules and procedures in regard to employment practices for employees covered by those statutory provisions. As part of the changes that were implemented in July 2015, FLSA-exempt members of the former classified staff were given the option to voluntarily move to academic staff positions or other positions within the university rather than remain in university staff positions.

There are certain vestiges of the classified staff structure that remain in place for university staff employees. For example, university staff employees are allowed to belong to collective bargaining units, although the rights of these collective bargaining units are severely restricted by Wisconsin statutes.

ORGANIZATIONAL PROFILE (41 CFR 60-2.11)

To meet the requirements at 41 CFR 60-2.11 regarding the preparation of an organizational profile, UWM has prepared a workforce analysis that can be found in Exhibit A. The workforce analysis presents information on departments within each division, school, and college at UWM. The workforce analysis shows employees by department, with information given on job title, job group, race, sex, and salary.

Job titles are shown from the lowest paid to the highest paid in a department. The workforce analysis shows hourly pay amounts for non-exempt employees and annualized wage amounts for exempt employees.

Department names in this workforce analysis are prefaced by the six-digit department code associated with that department. The department code is then followed by the department description for the relevant department. Department descriptions have at times been truncated. The first two digits of the department codes associated with each department name show the division, school, or college in which the department is found. The divisions, schools, and colleges associated with each department code preface are as follows:

<u>Preface</u>	<u>Division, School, or College</u>
01	General Education Administration: Chancellor's Office
02	Division of Finance and Administrative Affairs
03	Division of Student Affairs
04	Division of Enrollment Management and Student Success
05	Division of Academic Affairs
10	College of Health Sciences
11	School of Architecture and Urban Planning
12	Sheldon B. Lubar School of Business
17	School of Education
19	College of Engineering and Applied Sciences
21	Peck School of the Arts
25	School of Freshwater Sciences
34	Office of Research
35	Graduate School Education
38	College of General Studies
48	College of Letters and Science
50	UWM Libraries
51	School of Information Studies
65	College of Nursing
70	Joseph J. Zilber School of Public Health
86	Helen Bader School of Social Welfare
90	School of Continuing Education
91	University Relations
92	Development and Alumni Relations

93	Division of Diversity, Equity, and Inclusion
94	Secretary of the University

Similar to department codes and department descriptions, all job titles are prefaced by the job code associated with that job title. The job code is then followed by the job title for the relevant position. At times, job titles have been truncated.

There are certain employees who hold more than one appointment at UWM. Some of these employees are shown in more than one appointment in this workforce analysis and in the job group analysis, which is described in the next section of this AAP. These employees hold fundamentally distinct assignments with different responsibilities, and UWM has determined that it is important to reflect their employment in both appointments. For example, there are a number of employees who hold an appointment as Associate Dean in a particular school or college as well as an appointment as a faculty member in that same school or college. These employees are shown both in their Associate Dean job titles and faculty job titles in the workforce analysis and the accompanying job group analysis. A complete list of the employees who are shown in more than one appointment in the workforce analysis and job group analysis is available from UWM's Office of Equity/Diversity Services (EDS).

JOB GROUP ANALYSIS (41 CFR 60-2.12 and 2.13)

UWM has prepared a job group analysis that can be found in Exhibit B. This job group analysis is meant to satisfy the provisions of 41 CFR 60-2.12, requiring the combining of employees into job groups and the display of information on job titles within each job group. The job group analysis is also meant to satisfy the requirement of 41 CFR 60-2.13 to state the percentage of minorities and women in each job group.

The job group analysis plays a unique role in affirmative action plans developed under Executive Order 11246, in that all the statistical reports required by the regulations in 41 CFR 60-2 (other than the organizational profile) use the job groups developed here to present statistical information. For this reason, UWM has given careful attention to the formation of job groups, using three fundamental factors to develop them: job content, wage rates, and opportunities for advancement and other benefits of employment. Educational attainment, experience requirements, and FLSA status were additional criteria used to assign positions to specific job groups.

Positions that are part of the university staff can be identified by the fact that the job code associated with the relevant job title begins with a series of numbers. Positions that are part of the faculty and academic staff (including instructional academic staff positions) and limited appointee positions can be identified by the fact that the job code associated with the relevant job title begins with a letter. Certain job groups contain a mix of university staff and non-instructional academic staff.

Exhibit B shows employees by job group with information given on job title, race, sex, and salary. Job titles are shown from the lowest paid to highest paid within each job group. However, job titles are also distinguished from each other by department. Thus, in the job group for faculty in the College of Engineering and Applied Sciences, the job title Professor (shown in the workforce analysis and job group analysis as “C20NNF05-Professor”) has separate entries for the Materials Science and Engineering department, the Mechanical Engineering department, the Civil and Environmental Engineering department, and so on.

To incorporate employees from UWM at Waukesha and UWM at Washington County into its AAP, UWM created nine (9) job groups which are populated by faculty and instructional academic staff from the three departments in the College of General Studies:

- **FT16:** Tenured Faculty: CGS – Arts & Humanities;
- **FTT16:** Tenure Track Faculty: CGS – Arts & Humanities;
- **I20:** Instructional Academic Staff: CGS – Arts & Humanities;
- **FT17:** Tenured Faculty: CGS – STEM;
- **FTT17:** Tenure Track Faculty: CGS – STEM;
- **I21:** Instructional Academic Staff: CGS – STEM;
- **FT18:** Tenured Faculty: CGS – Social Science & Business;
- **FTT18:** Tenure Track Faculty: CGS – Social Science & Business; and

- **I22:** Instructional Academic Staff: CGS - CGS – Social Science & Business.

University staff and non-instructional academic staff members at UWM at Waukesha and UWM at Washington County were assigned to existing UWM job groups. For example, an Academic Librarian in the College of General Studies would be assigned to job group V01 (Advanced/Specialized Student Services and Academic Support), while a Dean's Assistant in the College of General Studies would be assigned to job group A05 (Other Paraprofessional Administrative).

AVAILABILITY ANALYSIS (41 CFR 60-2.14)

UWM has prepared an availability analysis that can be found in Exhibit C. This availability analysis is meant to satisfy the requirements found at 41 CFR 60-2.14. UWM has reviewed internal and external pools that might be available to fill the positions in each of its job groups. Supporting information for this availability analysis is found in Exhibit C.

A. Factor 1 – External Availability (Requisite Skills in Local and Non-Local Recruitment Areas)

UWM has evaluated the pool of external candidates who might have the qualifications for positions it may open, comparing its positions against census data from the 2014-2018 EEO tabulation (five-year American Community Survey data). Each job title was assigned a census code and data was weighted depending on the number of employees in each particular job title.

UWM used several geographic areas in determining availability for its positions:

- UWM used the United States as the reasonable (non-local) recruitment area for the job groups containing faculty positions, limited appointment (i.e., executive) positions, and certain other positions in the non-instructional academic staff. UWM used the United States as the reasonable recruitment area for these job groups because a national search might be required to find candidates with the necessary skills for these positions.
- UWM used a group of states in the Midwest—specifically, Illinois, Indiana, Iowa, Michigan, Minnesota, and Wisconsin—as the reasonable (non-local) recruitment area for job groups containing instructional academic staff positions and certain non-instructional academic staff positions. UWM identified these states as the reasonable recruitment area for these job groups because the university is most likely to draw candidates for these job groups from a search in the Midwest.
- UWM used the Milwaukee-Waukesha-West Allis (WI) Metropolitan Statistical Area (Milwaukee MSA) as the reasonable (local) recruitment area for the remaining job groups.¹ These job groups contain non-exempt positions or certain entry-level exempt positions. UWM used the Milwaukee MSA as the reasonable recruitment area for these job groups because UWM has typically been able to find candidates for positions in these job groups through a local search.

B. Factor 2 – Internal Availability (Promotable and Transferable Within UWM)

An important component of developing availability statistics is a review of internal candidates. Accordingly, UWM reviewed historical data and current information to determine which job groups and job titles might provide candidates for other job titles through promotion or transfer.

¹ The Milwaukee MSA is comprised of four counties in southeastern Wisconsin: Milwaukee County; Ozaukee County; Washington County; and Waukesha County.

When individual jobs might feed particular positions in a target job group, the feeder jobs are listed in the availability analysis. When multiple titles from one job group tend to act as feeders for multiple titles in another job group, the entire feeder job group was used as the source in the availability analysis. When there was more than one employee in a feeder title, employees identified in these feeder job titles have been included in feeder counts without regard to seniority, interest, or specific qualifications for promotion or transfer. Thus, figures from Factor 2 may overstate availability estimates in situations where minorities and women are among the least senior or least experienced employees in a job title.

Because availability assessments are intended to calculate the percentages of people who may enter a job group, no statistics are shown for those cases in which an individual would be promoted or transferred to a position from another position within the same job group.

C. Factor 3 – Educational Institutions

As a source for its tenure track faculty and instructional academic staff positions, UWM examined recent graduation rates from schools across the United States. Specifically, UWM used information on 2018 completions of doctoral degrees (and, for certain instructional academic staff job groups, completions of master's degrees) as provided by the Department of Education's National Center for Education Statistics (NCES). Detailed information on the particular classification of instructional program (CIP) codes used for each job group are found in the availability analysis.

It should be noted that completion data for any particular year may over- or understate the actual availability of minority and/or female candidates for tenure track faculty or instructional staff positions. The specialties of the graduating candidates, the specialties required by UWM, the level of interest by candidates in positions available at UWM, and other factors may affect the availability of candidates of any race and/or gender.

D. Value Weights

Final value weights are based on the number of individuals within a job group who would be recruited from a given factor. As noted above, individuals who would get a certain position from another position within the same job group are given no weight in assigning value weights. Value weights were at times rounded to approximate the number of people who might be placed in a given factor.

E. Summary

While UWM has attempted to carefully prepare the availability analyses included in this AAP, these analyses do not necessarily state the availability for any given job group in a precise manner. UWM has attempted to arrive at what it hopes are reasonably close

availability estimates. Many factors may affect the actual availability of candidates, however. One of the most critical factors affecting availability is UWM's need to find individuals that may have specific experience or education in a particular field of study or area of operation. Other factors include the inability to effectively separate census data into industry groups, the failure of individuals to properly identify their occupations to census takers, the failure of census officials to appropriately categorize certain job data, and the items noted above in regard to Factors 2 and 3. It should also be noted that census data contains very high margins of error for certain census occupation codes, which means that the actual availability figure for any particular job group may be heavily skewed in one direction or another.

COMPARISON OF INCUMBENCY TO AVAILABILITY (41 CFR 60-2.15)

UWM has prepared an analysis that compares the number of employees in each job group against the availability analysis developed for each job group. This document is found as Exhibit D.

UWM has used a two standard deviation test in determining where to set placement goals for minorities and women. UWM has determined that this test is the most expedient measure of where goals should be established. However, in situations where the two standard deviation test suggests that a goal should be set, other statistical tests that are equally valid may not suggest the need for such a goal.

The setting of a placement goal in any particular job group is not an admission of any discriminatory conduct, nor is it an admission of insufficient good faith efforts to attract minorities or women into UWM's employ. It is instead a way of discovering where statistics suggest that UWM should focus its recruitment and retention efforts.

The entry for each job group in Exhibit D should be read as follows:

Females

<i>Employee Count</i>	The total number of women in the job group, as of October 31, 2021
<i>Current Utilization</i>	The percentage of women in the job group
<i>Total Availability</i>	The availability percentage for women for the job group, as calculated in UWM's availability analysis
<i>Placement Goal?</i>	Whether a placement goal for women should be set, using a two standard deviation test
<i>Current Placement Goal</i>	If a placement goal has been set, the applicable percentage placement goal for women

Minorities

<i>Employee Count</i>	The total number of minorities in the job group, as of October 31, 2021
<i>Current Utilization</i>	The percentage of minorities in the job group
<i>Total Availability</i>	The availability percentage for minorities for the job group, as calculated in UWM's availability analysis
<i>Placement Goal?</i>	Whether a placement goal for minorities should be set, using a two standard deviation test
<i>Current Placement Goal</i>	If a placement goal has been set, the applicable percentage placement goal for minorities

PLACEMENT GOALS (41 CFR 60-2.16)

Placement goals for minorities and women have been developed for all job groups where the comparison of incumbency to availability suggests that such a goal should be set. A chart showing the placement goals that have been set for the current AAP year is found as Exhibit E. UWM has used the availability percentage for minorities or women as the placement goal for any job group where the comparison of incumbency to availability has suggested that a placement goal should be set. These placement goals will be compared to the percentage of minorities or women who may be hired or who may be promoted into the job groups where there are placement goals. UWM has established no specific numerical targets in regard to the specific number of individuals that it expects or intends to hire or promote during the current AAP year.

UWM has used a two standard deviation test in determining where placement goals should be set. Because of the large number of incumbents in many job groups, UWM has decided that the two standard deviation test is the most efficient test in determining where UWM should focus its outreach efforts. UWM recognizes that other statistical tests might result in the establishment of a larger or smaller number of placement goals. UWM's fundamental objective in establishing placement goals is to ensure that it provides equal opportunity in employment to minorities and women seeking new positions with UWM.

There may be a variety of reasons that the comparison of incumbency to availability suggests that placement goals should be set.

- UWM has several job groups where employment has been stable or has declined over a number of years, which has prevented UWM from adding minorities or women to these job groups.
- There are job groups where UWM has found it difficult to attract qualified minority or female applicants for certain positions, limiting the university's opportunities to add minorities or women to these job groups.
- There are job groups which include positions that require a very precise set of skills and qualifications that have limited UWM's ability to attract any candidates when there have been openings, regardless of the race, ethnicity, or gender of the candidate.
- There are several job groups that historically have had a significant number of white and/or male incumbents. Thus, even when UWM has been able to add minorities or women to these job groups, there may continue to be a placement goal.
- There are job groups that have placement goals because the availability analysis indicates there are a significant number of minorities or women available to enter positions in those job groups. Again, even when UWM has been able to add minorities or women to some of these job groups, there may continue to be a placement goal. For example, UWM has set placement goals to add women to job group A06 (Advanced Clerical and Office Management) and job group A07 (Clerical Administrative) even though a significant majority of the incumbents in these job groups are women and most of the placements during the last AAP year into titles that are part of these job groups were women. Nevertheless, there are placement goals for

women associated with these job groups because the availability figures associated with these job groups are so high.

ADDITIONAL REQUIRED ELEMENTS OF THE AFFIRMATIVE ACTION PROGRAM (41 CFR 60-2.17)

In addition to preparing the statistical reports that are required in sections 41 CFR 60-2.11 through 60-2.16 of the federal affirmative action regulations, UWM has taken actions intended to implement the provisions of 41 CFR 60-2.17.

A. Designation of Responsibility (41 CFR 60-2.17(a))

As the chief executive officer for UWM, the Chancellor has ultimate responsibility and accountability for ensuring the effective implementation of UWM's equal employment opportunity and affirmative action (EEO/AA) programs. The operational aspects of various EEO/AA programs are delegated to a number of UWM offices. Pursuant to Wisconsin statutes, in the Chancellor's absence, the Provost assumes the responsibilities of the chief executive officer in areas that would include the implementation of the university's EEO/AA programs.

As noted in the introduction to this AAP, UWM is composed of several divisions: Academic Affairs (which also houses the Division of Enrollment Management); Student Affairs; Finance and Administrative Affairs; and General Education Administration, which itself is composed of three divisions: University Relations; the Division of Diversity, Equity, and Inclusion; and Development and Alumni Relations. Academic Affairs, Finance and Administrative Affairs, University Relations, the Division of Diversity, Equity, and Inclusion, Student Affairs, and Development and Alumni Relations are each headed by a vice chancellor.

The six vice chancellors report directly to the Chancellor and are charged with overseeing personnel activities in their divisions and areas of responsibility. Each vice chancellor is expected to actively promote UWM's affirmative action objectives and to take initiative in fostering a work environment that values diversity and equal opportunity and that is free of harassment and discrimination. The appointment letters for the vice chancellors specifically detail these expectations.

As noted in the introduction to this AAP, each UWM division is further divided into distinct administrative units, led by a director (for administrative units) or dean (for most academic schools and colleges). The deans, directors, and the Deputy to the Provost for the School of Continuing Education are responsible for implementing EEO/AA programs within their respective units. The vice chancellor of each division or unit monitors the implementation of these programs.

The Department of Human Resources reviews personnel activity transactions for compliance with University policies, including EEO/AA policies. The Chief Human Resources Officer, who reports to the Vice Chancellor for Finance and Administrative Affairs, identifies problem areas and provides input to deans, directors, and vice

chancellors. The Division of Finance and Administrative Affairs monitors and ensures compliance with the requirement to make the “EEO is the Law” and related posters and policy statements available to applicants and employees.

The Director of the Office of Equity/Diversity Services (EDS) is responsible for monitoring and ensuring compliance with UWM’s Equal Opportunity Policy. In this capacity, the Director has the full support of, and access to, senior university officials, including the Chancellor. The duties of the Director of EDS also include reviewing and updating the university’s Executive Order 11246 affirmative action plan and other affirmative action plans on an annual basis. EDS is also responsible for developing affirmative action training programs, investigating discrimination complaints, assisting department directors and supervisors in identifying problem areas and developing resolutions for the same, and keeping management informed of the latest developments within the equal employment opportunity/affirmative action realm.

B. Identification of Problem Areas (41 CFR 60-2.17(b))

UWM has reviewed its personnel processes to determine whether and where impediments may exist in providing equal opportunity to all applicants and employees. UWM has also reviewed its personnel processes to determine whether it is effectively taking affirmative action to recruit and employ qualified minorities and women. As a general matter, UWM has found no systemic barriers to employment of applicants or employees based on any of the classifications protected by Executive Order 11246. A more in-depth analysis of UWM’s personnel processes based on factors found in the federal affirmative action regulations follows.

1. Analysis of the Workforce (41 CFR 60-2.17(b)1)

UWM has reviewed data regarding its workforce to determine whether there are any problems in regard to underutilization for minorities or women or the distribution of minorities and women in various work units. While UWM has found no systemic barriers that are preventing minorities or women from entering certain types of positions, a review of the workforce analysis and comparison of incumbency to availability provides some insight into work units and job groups that will receive additional attention during the current AAP year.

a. Review of the Workforce Analysis

Most of UWM’s departments do not have a sufficient number of incumbents to make any determinations regarding the distribution of minorities and women in these departments. That said, it appears there are a relatively small number and proportion of minority employees in University Relations, University Housing, the registrar’s office, the financial aid office, the Student Union, the athletics department, the student health department, and the university’s childcare center, while there are a relatively large number and proportion of minorities in the custodial services department. There also appear to be a

relatively small number and proportion of minorities in the School of Freshwater Sciences; in the humanities department in the College of General Studies; in the visual art, film, and music departments in the Peck School of the Arts; in the teaching and learning department in the School of Education; in the social work department in the School of Social Welfare; in the anthropology, chemistry, mathematical sciences, and psychology departments in the College of Letters and Science; and in the College of Nursing.

It also appears there are a relatively small number and proportion of women in information technology positions and in facility services positions, other than custodial positions, while there are a relatively large number and proportion of women in the financial aid office, the registrar's office, the childcare center, and the student health department. There are also a relatively large number and proportion of women in the School of Education; the College of Nursing; and the physical therapy department in the College of Health Sciences.

It should be noted that the percentage of minorities and women in these departments and areas is often significantly affected by the availability of minorities and women for the type of work being done. This is especially the situation with the academic areas that have a large number of women.

b. Placement Goals

As noted earlier in this AAP, UWM has established placement goals for job groups where a two standard deviation test suggests that placement goals should be set.

In this AAP year, the following job groups have placement goals to add minorities:

- A02 – Professional Administrative
- D02 – Assistant Directors and Equivalent
- E02 – Advanced Executive
- FT04 – Tenured Faculty: Education
- FT09 – Tenured Faculty: L&S – Social Sciences
- FT10 – Tenured Faculty: Library and Info Sciences
- I02 – Instructional Academic Staff: Health Sciences
- I04 – Instructional Academic Staff: Business Administration
- I06 – Instructional Academic Staff: Engineering and Applied Sciences
- I07 – Instructional Academic Staff: Arts
- I08 – Instructional Academic Staff: L&S – Humanities/Communications
- I09 – Instructional Academic Staff: L&S – Natural Sciences
- I10 – Instructional Academic Staff: L&S – Social Sciences
- I12 – Instructional Academic Staff: Nursing
- I13 – Instructional Academic Staff: Social Welfare
- I15 – Instructional Academic Staff: Other Academic Staff
- I20 – Instructional Academic Staff: CGS – Arts and Humanities

In this AAP year, the following job groups have placement goals to add women:

A06 – Advanced Clerical and Office Management (Administrative)
A07 – Clerical Administrative
A10 – Professional Information Technology (Admin)
D01 – Directors and Associate Directors
FT02 – Tenured Faculty: Architecture and Urban Planning
FT03 – Tenured Faculty: Business Administration
FT05 – Tenured Faculty: Engineering and Applied Science
FT07 – Tenured Faculty: L&S – Humanities/Communications
FT09 – Tenured Faculty: L&S – Social Sciences
FT12 – Tenured Faculty: Social Welfare
FTT11 – Tenure Track Faculty: Nursing
FTT15 – Tenure Track Faculty: Freshwater Sciences
I04 – Instructional Academic Staff: Business Administration
I06 – Instructional Academic Staff: Engineering and Applied Sciences
I10 – Instructional Academic Staff: L&S – Social Sciences
I11 – Instructional Academic Staff: Library and Info Studies
I22 – Instructional Academic Staff: CGS – Social Science and Business

UWM's placement goals often reflect the areas where it appears from the workforce analysis that UWM has a relatively small number of employees in particular departments or other work units. It is worth noting that the placement goals to add women to job groups A06 and A07 are something of a statistical anomaly because a large majority of the incumbents in these job groups are women and because women typically comprise a significant majority of both the applicants and hires in these job groups.

UWM has established placement goals in several of its job groups which are comprised of tenured faculty members. Tenure track faculty members are generally reviewed for tenure after six years of employment at UWM. It should be noted that this tenure review process is non-competitive: promotion to the rank of tenured faculty member is not the result of the university selecting an individual from a pool of qualified candidates, but is instead a recognition of an individual faculty member's scholarship, teaching, and university service, as assessed by their peers. As such, to the extent that placement goals exist for job groups of tenured faculty positions, the ability to meet these placement goals will be heavily influenced by the demographic composition of persons in the related tenure track faculty positions and the point in the tenure process that any individual tenure track faculty member is at.²

² For example, in the last AAP year, placement goals for women were established for job groups FT02 (Tenured Faculty: Architecture and Urban Planning), FT05 (Tenured Faculty: Engineering and Applied Science), and FT12 (Tenured Faculty: Social Welfare), and a placement goal for minorities was set for job group FT10 (Tenured Faculty: Library and Info Sciences). In the following year, there were no placements in any of these job groups because none of the individual tenure track faculty members in the corresponding tenure track job groups (i.e., FTT02, FTT05, FTT10,

2. Review of Personnel Activity (41 CFR 60-2.17(b)2)

UWM has reviewed data regarding the personnel activity that occurred during the last AAP year (i.e., November 1, 2020 through October 31, 2021) to determine whether there are any selection disparities or other issues that might require the university's attention. UWM has not found any patterns that would suggest there are any systemic issues in regard to providing equal opportunity to applicants or employees of any particular race, ethnicity, or gender. A review of last year's personnel activity does provide some insight into areas where UWM may be able to strengthen its recruitment procedures and ensure that applicants and employees continue to receive appropriate consideration for hiring, promotion, and retention decisions.

a. Definition of "Hire," "Promotion," and "Transfer"

In analyzing the personnel activity that occurred during the last AAP year, UWM was guided in part by the manner in which the university has defined the terms "hire," "promotion," and "transfer." When used in the statistical analyses that have been prepared for this AAP or otherwise reviewed as a part of UWM's assessment of its personnel practices, the following personnel actions were considered to be hires, promotions, or transfers:

- Situations where a position was filled through competitive recruitment—regardless of whether the position was filled internally or externally—were generally considered to be hires. For example, a situation where an employee moved from one position to another at UWM, and where the position was opened for recruitment and multiple candidates expressed interest, would be considered a hire.
- Situations where an employee moved from one employment category to another, including situations where an employee received a second appointment while continuing to serve at least part-time in their original appointment, were considered to be hires. For example, a situation where an employee in a faculty position was appointed to an Associate Dean position would be considered a hire.
- Situations where an employee moved from one division, school, or college to a different division, school, or college were considered to be hires.
- Situations where employees moved to new levels within their respective classifications were considered promotions. For example, a situation where an employee moved from Financial Specialist to Financial Specialist Senior would be considered a promotion.
- Situations where faculty members moved to higher-ranking faculty positions were considered to be promotions. For example, a situation where an employee moved from Assistant Professor to Associate Professor would be considered a promotion.
- Situations where instructional academic staff members moved to higher-ranking instructional academic staff positions were considered to be promotions. For example,

and FTT12) was at the point in the tenure process to request tenure. As such, UWM was unable to make progress in meeting its placement goals in these job groups.

a situation where an employee moved from Lecturer to Senior Lecturer would be considered a promotion.

- Situations where employees moved to a new title/position but where there was no upward movement with respect to salary range (as compared to the previously held position) would be considered a transfer.

b. Progress Towards Meeting Prior Year Placement Goals

UWM has reviewed the progress it made in meeting the placement goals that were established in its previous affirmative action plan. A chart that shows all job groups along with the placement goals that were attached to these job groups and whether these placement goals were met is included with this affirmative action plan as Exhibit F.

At the start of the last AAP year, UWM had placement goals to add both minorities and women to four (4) job groups. UWM had placement goals to add minorities to nine (9) other job groups, and placement goals to add women to 12 other job groups. UWM was able to meet several of the placement goals set at the start of the last AAP year.

- UWM met its placement goal to add minorities to job group I06 (Instructional Academic Staff: Engineering and Applied Science) when it hired one minority into a position in this job group.
- UWM met its placement goal to add women to job group I11 (Instructional Academic Staff: Library and Info Studies) when it hired one woman into a position in this job group.
- UWM met its placement goals to add women and minorities to job group I13 (Instructional Academic Staff: Social Welfare) when it hired one minority woman into a position in this job group.
- There were five job groups that had placement goals for minorities—job groups FT10 (Tenured Faculty: Library and Info Studies); I05 (Instructional Academic Staff: Education); I07 (Instructional Academic Staff: Arts); I09 (Instructional Academic Staff: L&S – Natural Sciences); and I12 (Instructional Academic Staff: Nursing)—that had no placements during the last AAP year, and thus there were no opportunities to meet the placement goals attached to these job groups.
- There were five job groups that had placement goals for women—job groups FT02 (Tenured Faculty: Architecture and Urban Planning); FT05 (Tenured Faculty: Engineering and Applied Science); FT12 (Tenured Faculty: Social Welfare); FTT15 (Tenure Track Faculty: Freshwater Sciences); and I22 (Instructional Academic Staff: CGS – Social Science and Business)—that had no placements during the last AAP year, and thus there were no opportunities to meet the placement goals attached to these job groups.
- There were two job groups that had placement goals for women and minorities—job groups I04 (Instructional Academic Staff: Business Administration) and I10 (Instructional Academic Staff: L&S – Social Sciences)—that had no placements during the last AAP year, and thus there were no opportunities to meet the placement goals attached to these job groups.

UWM made a variety of efforts to meet the placement goals it had established at the start of the last AAP year. UWM used recruitment sources that broadly targeted minorities and women seeking employment, and more specific resources that targeted minorities and women seeking specialized positions within particular departments, schools, or colleges. Examples of some of the recruitment sources used during the last AAP year are as follows:

- UWM used local organizations such as the Milwaukee Urban League, La Casa de Esperanza, and Hispanic Professionals of Greater Milwaukee to attract minority candidates for university staff and non-instructional academic staff positions.
- UWM used websites such as hispanicoutlookjobs.com, DiversityJobs.com, and DiversityinEd.com to attract minority candidates.
- UWM used websites such as careerwomen.com, womenforhire.com, womensjoblist.com, and National Women’s Study Association Job site to attract female candidates.
- UWM used websites such as milwaukeediversity.com, Wisconsin LGBT Chamber of Commerce, Ability Jobs, and Monster Diversity Network to attract a variety of non-traditional candidates.
- A number of schools and colleges announced openings through historically black colleges and universities in order to attract minorities for teaching positions.
- Several schools and colleges advertised openings with Women in Higher Education.
- The College of Letters and Science used a variety of national associations, such as National Forum for Black Public Administrators, to attract more minority candidates for available positions.
- A number of schools and colleges utilized the Journal of Blacks in Higher Education and Women in Higher Education to attract both female and minority candidates for staff and teaching positions.

The list above is not meant to be an exhaustive list. The divisions, schools, and colleges that had openings during the last AAP year used a wide spectrum of different recruitment mechanisms to help meet placement goals and draw minorities and women into applicant pools. UWM was, in fact, successful in attracting a significant number of minority and female candidates, and minorities and women were hired into various positions throughout the university because of these recruitment efforts.

c. Review of Selection Results

A personnel activity table that provides summary information on the hires and promotions that occurred during the last AAP year is included in this AAP as Exhibit G. The personnel activity table shows data by race, ethnicity, and gender within each job group. The personnel activity table includes data on applicants and hires, as well as data on all forms of promotions (whether into, within, or out of a job group) as well as data on all forms of transfers (whether into, within, or out of a job group).

UWM has closely reviewed the information on this personnel activity table to determine whether there were any situations showing a statistically significant variance in the rate at which minorities and whites were selected for hires or promotions. UWM has also closely reviewed the information on this table to determine whether there were any situations showing a statistically significant variance in the rate at which women and men were selected for hires or promotions.

UWM's review of applicant and hire data involved assessing applicant flow for all job groups with a placement goal as well as comparing data on persons expressing interest in open positions to the persons selected for those open positions. Individuals who did not meet basic (minimum) qualifications, individuals who withdrew from consideration, and other individuals who could not properly be considered "Internet Applicants" were not included in these comparisons. If UWM's Department of Human Resources identifies any insufficient applicant flow for a job group with a placement goal, it consults with EDS and works with the applicable department(s) to expand outreach efforts aimed at attracting a pool that reflects the availability of minorities and women in the respective job group for each recruitment.

UWM's review of promotion data involved a comparison of employees leaving a job group to the incumbent population in the job group at the start of the last AAP year. There were a relatively small number of promotions involving employees moving from a position in one job group to a position in another job group that occurred during the last AAP year. Most situations involving employees moving from positions in one job group to positions in another job group were classified as hires in the data included with this AAP.

d. Review of Retention

The personnel activity table that is included in this AAP includes data on individuals who left UWM's employ. There is information in the table that shows UWM's data on all persons leaving the university as well as information that shows persons who involuntarily left the university. UWM's review of this retention data involved a comparison of employees leaving the university to the incumbent population in the job groups that contained the positions that these employees held. EDS works with the relevant divisions, schools, and colleges to review situations where there are any noticeable statistical variances in retention.

3. Review of Compensation Systems (41 CFR 60-2.17(b)3)

UWM has reviewed employee compensation on a regular basis to ensure there are no systemic disparities involving race, ethnicity, or gender. UWM has contracted with external consultants to provide assistance in evaluating compensation practices and decisions. Any comprehensive review of compensation is conducted under the guidance of UWM's Office of Legal Affairs. UWM has found no evidence of systemic disparities during any of its recent compensation reviews.

4. Review of Selection, Recruitment, Referral, and Other Personnel Procedures (41 CFR 60-2.17(b)4)

UWM has reviewed its selection, recruitment, and referral procedures to determine whether they have resulted in disparities involving the employment or advancement of minorities or women. UWM has also reviewed other personnel processes that may have resulted in disparities involving the employment or advancement of minorities or women. There appear to be no specific problems associated with the university's processes or procedures in these areas that are acting as an impediment to providing equal employment opportunity to minority or female applicants and employees.

UWM has a decentralized recruitment and selection process, where many of the recruitment and selection decisions are made within the divisions, schools, and colleges. These units may approach recruitment and selection differently depending on the nature of the open position, the resources available to find candidates for the position, and the number of open positions existing at any particular time in the relevant unit. For example, recruitment for a member of the university staff may be limited to placement of advertisements and postings with local resources, while recruitment for a faculty member may involve the placement of advertisements with highly-specialized journals, contacts to schools and websites that may have access to candidates with very particular skill sets, and the use of specific resources that are targeted to minorities and women who may be involved in a particular field.

Selection processes for candidates also depend on the nature of an open position and the level of recruitment activity occurring at any particular time. UWM has instituted various policies and procedures to ensure that there is appropriate consideration of candidates, and that all candidates are provided with equal opportunity for consideration regardless of race, ethnicity, gender, or other classifications protected under federal or State law. Selection processes for limited appointment positions are generally handled by a committee that has the responsibility for ensuring that candidates have the leadership skills, educational background, institutional knowledge, and other attributes that would make them valuable additions to the university. Selection processes for faculty and academic staff positions may be overseen by a committee or by the respective supervisor for the area with the open position. Again, those assigned to evaluate candidates are responsible for assessing the educational background and specific skill sets of individuals who have expressed interest in the positions. When evaluating faculty or instructional academic staff positions, persons involved in the evaluation process will consider both specific academic preparation for these openings as well as specializations that candidates may bring to the university. UWM has specific policies in regard to the consideration of candidates who may be moving from tenure track to tenured faculty positions and candidates who may be moving to an indefinite appointment as an academic staff member.

5. Review of Other Areas That May Affect the Affirmative Action Program (41 CFR 60-2.17(b)5)

UWM has reviewed various policies, practices, and procedures that may impact the success of its affirmative action program. For example, the university has reviewed the posting of the federal equal opportunity poster and its supplement, the posting of job notices and other employment information, the availability of information regarding UWM's equal opportunity policy and harassment policies, and the ability of applicants and employees to express concerns about possible issues regarding equal employment opportunity. UWM has found no systemic problems in any of these areas.

C. Action-Oriented Programs (41 CFR 60-2.17(c))

Having conducted an extensive analysis of its data, programs, and practices as required by the federal affirmative action regulations under Executive Order 11246, UWM has devised certain action-oriented programs meant to help the university more effectively provide equal employment opportunity to all applicants and employees. UWM is committed to diversity and inclusiveness. That commitment to diversity and inclusiveness goes beyond legislative mandates and compliance measures. UWM strives to develop and maintain a cohesive, inclusive and diverse community that affirms teamwork, trust and cooperation.

1. Actions to Address Issues in the Workforce Analysis

UWM will take certain steps to address the issues it has discovered through a review of its workforce analysis. While not an exhaustive list, UWM notes the following examples of steps it will take during the current AAP year:

- UWM will attempt to add minorities to positions throughout the university. EDS, in consultation with the Department of Human Resources, the Office of Legal Affairs, and the divisions, schools, and colleges, will evaluate whether there are reasons that there are an unexpectedly high or low number of minorities in certain positions and departments.
- UWM will also attempt to add women to positions throughout the university. UWM will evaluate whether there are reasons that there are an unexpectedly high or low number of women in certain positions and departments.
- UWM will work to ensure that minorities and women are being considered for all faculty and instructional academic staff positions.

2. Actions to Address Placement Goals

As noted above, UWM has established placement goals for certain job groups where a two standard deviation test suggests that placement goals should be set. UWM will take certain actions in order to attempt to meet these placement goals:

- EDS will alert the Human Resources Business Partner (HRBP) for each division, school, and college about the existence of the placement goals in the affirmative action

plan. HRBPs will be specifically pointed to placement goals that may be closely associated with their respective division, school, or college.

- EDS will meet with the HRBPs and other representatives of the divisions, schools, and colleges to discuss recruitment plans meant to draw minorities and women into candidate pools for positions where there may be placement goals.
- EDS, in conjunction with the Department of Human Resources, will provide the divisions, schools, and colleges with examples of recruitment sources that may be helpful in meeting placement goals.
- UWM will provide a form for all hires that will be used to describe the reasons that particular candidates are selected for open positions. This form must be reviewed and approved by the relevant HRBP and Dean/Division Head before a hire can occur. The form will also be reviewed by the Department of Human Resources. The persons involved in the screening process will be asked to provide a rationale for the selection of the chosen candidate when the candidate does not meet a placement goal that is associated with the open position.

Other action plans may be developed if UWM determines that placement goals are routinely not being met and that UWM is unable to demonstrate that effective good faith efforts have been applied to the recruitment and selection process for positions with placement goals.

3. Actions Regarding Recruitment and Selection Generally

While UWM has found no systemic problems in regard to its recruitment or selection practices or procedures, the university remains committed to providing equal employment opportunity for all applicants and employees in their practices and procedures. To that end, UWM will take the following actions:

- HRBPs will be required to review position descriptions and position announcements to ensure that job criteria are relevant to the position, and in particular to ensure that education and experience requirements are reasonable and valid.
- UWM's Office of Legal Affairs will offer training to search and screen committees regarding appropriate, nondiscriminatory assessment of application materials and interview techniques.
- UWM departments will be expected to post or generally announce any open positions, including promotional opportunities, on the UWM Employment Opportunities website.
- All advertisements will include a statement affirming that UWM is an equal opportunity employer.
- UWM will communicate with all major recruitment sources about its job openings and the university's status as an equal opportunity/affirmative action employer. Recruitment sources will be asked to include qualified minorities and women among their referrals.
- UWM will continue to utilize recruitment sources that specifically work with minorities and women seeking employment, especially when there are openings in positions that have placement goals.

- When UWM becomes aware of talent that would benefit the university in a particular program or discipline, the Vice Chancellor/Provost maintains the authority to allow for a “target of opportunity hire.” UWM will attempt to ensure that these opportunity hires are used in part to improve underrepresentation in job groups, departments, or other work units where there is such underrepresentation.

4. Actions Regarding Retention

UWM remains committed to providing an environment where employees can fully contribute to the university’s success. To that end, UWM will take the following actions:

- The Department of Human Resources will continue to monitor all situations where employees are terminated to ensure that such actions are based on legitimate, work-related reasons.
- EDS will investigate any situations where data on retention suggests there may be a statistical imbalance regarding the number or percentage of individuals of any particular race, ethnicity, or gender leaving the university.
- Individuals who are leaving UWM will be offered the opportunity to participate in an exit survey or exit interview. UWM will use the information obtained from exit surveys and exit interviews to determine whether there are any specific issues that may require the university’s attention.

5. Actions Regarding Compensation

UWM has instituted and will continue with a plan to review employee compensation on a regular basis. UWM will review certain segments of its employee population each year in order to determine whether there are any systemic issues regarding compensation that are associated with the race, ethnicity, and/or gender of the university’s employees. UWM may use various tools as part of this review. Results of this review will be shared with EDS, the Department of Human Resources, and the Office of Legal Affairs.

Should UWM find any particular situations that require its attention, UWM will determine the best way in which to address these situations. This may include preparing additional statistical studies, meeting with representatives of the divisions, schools, and colleges to gather additional information, and evaluating the resources available to make any specific salary adjustments. UWM will take action to address any specific issues where the university is unable to show that race, ethnicity, and/or gender did not affect compensation.

6. Additional Action-Oriented Programs

UWM will take whatever steps are necessary to fully implement this AAP. UWM has established a number of programs and takes a number of actions that should help in this implementation:

- *Racial Justice and Equity Program:* In Spring 2021, UWM launched a Racial Justice and Equity Program (RJEP) which was developed by UWM faculty and staff. The RJEP is an anti-racist, anti-bias training program which was offered to all faculty and staff. It contains five modules designed to educate participants on the influence of implicit racial biases on behavior and on practical steps that participants can take to combat racism and foster inclusion.
- *Affinity Groups:* There are a number of faculty and staff organizations, both formal and informal, which exist at UWM whose missions are to support, encourage, mentor and/or advocate for their respective communities. Examples of these groups include the Affirmative Action in Faculty Employment Committee (AAFEC), as well as the African Diaspora Council, the Asian Faculty and Staff Association, and the Latino Faculty and Staff Association.
- *Neutral Investigations of Complaints:* EDS is charged with conducting investigations and resolving complaints brought under UWM's Discriminatory Conduct Policy, a copy of which is included as Exhibit I with this AAP.
- *UWM Office of Conflict Resolution and Ombuds Council:* This office acts as an independent, neutral, and confidential resource to provide assistance to UWM faculty and staff in exploring options to resolve issues outside of a formal complaint process. The Council is led by a UWM Distinguished Professor and includes faculty, academic staff, and university staff employees.
- *Posting and Dissemination of the Equal Employment Opportunity Policy:* UWM will continue to make employees, applicants, and other interested persons aware of its status as an equal opportunity employer.
- *Other Postings:* The Associate Vice Chancellor for Finance and Administrative Affairs and the Office of Legal Affairs review all federal and State posting requirements in order to ensure UWM remains in compliance with posting requirements. The equal employment opportunity policy and all items required to be posted are sent to building managers for posting.

D. Internal Audit and Reporting Systems (41 CFR 60-2.17(d))

UWM has developed and implemented an auditing system that measures the effectiveness of its affirmative action program. UWM also undertakes efforts to identify and remedy any barriers to providing equal opportunity to applicants and employees.

UWM is able to generate reports on personnel activity that provide information on the race, ethnicity, and gender of applicants and employees. The following reports are generated and monitored on a regular basis by the Department of Human Resources:

- Applicant Reports
- Hire Reports
- Promotion Reports
- Transfer Reports
- Termination Reports

These personnel transaction reports are analyzed to determine whether any type of personnel activity is having a disproportionate effect on applicants or employees of any particular race, ethnicity, or gender. When issues are identified, they are brought to the attention of division heads and appropriate action is taken.

UWM is considered a “Records Authority” under the laws of the State of Wisconsin, and, as such, it cannot destroy records—including personnel records—without a records disposition authority form approved by the Wisconsin Public Records and Forms Board. Most personnel records must be retained for a period of time longer than the two years set forth in 41 CFR 60-1.12. For example, search and screen committee records must currently be retained for a period of six years from the date a recruitment is closed.

The Director of EDS meets with the Vice Chancellor for the Division of Diversity, Equity, and Inclusion to discuss any issues discovered during the preparation of UWM’s affirmative action plan. There are also meetings to discuss issues that may arise during the year in regard to UWM’s efforts to provide equal opportunity to applicants and employees. The Director of EDS and/or the Vice Chancellor for the Division of Diversity, Equity, and Inclusion bring significant issues to the attention of the heads of the divisions, schools, and colleges, and to the Provost and the Chancellor as appropriate.