AFFIRMATIVE ACTION PROGRAM
FOR PROTECTED VETERANS AND
INDIVIDUALS WITH DISABILITIES

AA Plan Year:

July 1, 2014 to June 30, 2015
UNIVERSIDAD CENTRAL DE BAYAMÓN

AFFIRMATIVE ACTION PROGRAM
FOR PROTECTED VETERANS
AND INDIVIDUALS WITH DISABILITIES

and
Section 503 Rehabilitation Act of 1973, as amended

For the Period

July 1, 2014 to June 30, 2015

President
Name & Title
Lillian Negrón-Colón, Ph.D.
President

EEO Officer
Name & Title
Elaine Núñez,
Human Resources Director

07/01/14 to 06/30/15
AFFIRMATIVE ACTION PROGRAM
FOR PROTECTED VETERANS AND
INDIVIDUALS WITH DISABILITIES

Contractor: UNIVERSITY CENTRAL DE BAYAMÓN

Data as of: June 30, 2014

Employer Identification: 66-0259904

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07/01/14 to 06/30/15
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I. INSPECTION OF THIS AAP
41 CFR 60-300.41, 41 CFR 60-741.41

The full Affirmative Action Program for Protected Veterans and Individuals with Disabilities is available for inspection by any employee and applicant upon request in the Human Resources Department of UNIVERSIDAD CENTRAL DE BAYAMÓN during normal business hours. This information is posted on bulletin boards in common areas accessible to both applicants and employees.

II. INVITATION TO SELF-IDENTIFY
41 CFR 60-300.42, 41 CFR 60-741.42

After making an offer of employment to a job applicant and before the applicant begins his or her employment duties, UNIVERSIDAD CENTRAL DE BAYAMÓN will invite the applicant to inform it whether the applicant believes that he or she might be covered by the Rehabilitation Act or Vietnam Veterans Readjustment Assistance Act and wishes to benefit under the AAP.

UNIVERSIDAD CENTRAL DE BAYAMÓN is taking the necessary steps to maintain in compliance with the new regulations published on September 24, 2013 that became effective on March 24, 2014. Invitations to self-identify as individuals with disabilities or special disable veterans are to be made pre-employment and at the making of an employment offer for all job applicants.

The form of the invitation is as prescribed by the regulations: it indicates that identification may be made now or at any time in the future, and it summarizes the relevant portions of the acts and of UNIVERSIDAD CENTRAL DE BAYAMÓN’s AAP. The invitation states that the information is voluntary and will be kept confidential and will be used in a manner consistent with law.

UNIVERSIDAD CENTRAL DE BAYAMÓN will maintain a separate file on persons who have self-identified and will provide that file to the Office of Federal Contract Compliance Programs (OFCCP) upon request.

07/01/14 to 06/30/15
III. EQUAL EMPLOYMENT OPPORTUNITY POLICY

41 CFR 60-300.44 (a), 41 CFR 60-741.44 (a)

It is the policy at UNIVERSIDAD CENTRAL DE BAYAMÓN to provide equal employment and advancement opportunities to all qualified individuals. To achieve this, UNIVERSIDAD CENTRAL DE BAYAMÓN is dedicated to taking affirmative action to employ and advance in employment protected veterans and individuals with disabilities. All personnel actions, including compensation, benefits, recruitment, hiring, training and promotions of persons in all job titles, will be administered without regard to protected veteran or disability status and all employment decisions are based solely on valid job requirements. In addition, employees and applicants are protected from harassment, threats, coercion, intimidation, or discrimination for:

1. Filing a complaint;

2. Assisting or participating in an investigation, compliance review, hearing, or any other activity related to the administration of VEVRAA, Section 503 or any other Federal, State, or local law requiring equal opportunity for protected veteran or individuals with disabilities;

3. Opposing any act or practice made unlawful by VEVRAA, Section 503 or its implementing regulations in this part, or any other Federal, State or local law requiring equal opportunity for protected veterans and individuals with disabilities; or

4. Exercising any other right protected by VEVRAA, Section 503 or its implementing regulations.

This EEO policy has the full support of Lillian Negrón Colón, President, who has assigned responsibility for its implementation to Elaine Núñez, Human Resources Director as EEO Officer. UNIVERSIDAD CENTRAL DE BAYAMÓN has designed and implemented an audit and reporting system to monitor and maintain its compliance with the Acts.

A copy of the Equal Employment Opportunity statement that reaffirms UNIVERSIDAD CENTRAL DE BAYAMÓN's commitment to protected veterans and individuals with disabilities is posted in a form that is accessible and understandable to an individual with a disability.
IV. REVIEW OF PERSONNEL PROCESSES

41 CFR 60-300.44(b), 41 CFR 60-741.44(b)

UNIVERSIDAD CENTRAL DE BAYAMÓN reviews its employment procedures to ensure careful, thorough, and systematic consideration of the job qualifications of protected veterans and applicants with disabilities for job vacancies filled either by hiring or promotion, and for all training opportunities offered or viable. This review ensures that personnel procedures do not stereotype protected veterans and individuals with disabilities in a manner that limits their access to all jobs for which they are qualified. Applicants and employees with disabilities have equal access to personnel processes, including those implemented through information and communication technologies. UNIVERSIDAD CENTRAL DE BAYAMÓN periodically reviews its processes and makes any necessary modifications to ensure its affirmative action obligations are carried out. When protected veterans are considered for employment, only that portion of the individuals’ military records, including discharge papers, that is relevant to the requirement of the position will be considered.

The following are some procedures that may be used to facilitate the review and evaluative process:

1. The application or personnel form of each protected veteran and applicant with a disability is annotated to identify each vacancy for which the applicant was considered and is retrievable for review for use in investigations and internal compliance activities;

2. The application or personnel form of each protected veteran and applicant with a disability includes the identification of each promotion and training program for which that employee was considered;

3. When a protected veteran employee or applicant is rejected for employment, promotion, or training, a statement of the reason is appended to the personnel file.

4. When an employee or applicant with a disability is rejected for employment, promotion, or training, a statement of the reason is appended to the personnel file along with a description of any reasonable accommodation considered.

5. When an employee or applicant is selected for hire, promotion, or training, and reasonable accommodation has been undertaken to enable the selection of an employee or applicant with a disability, the applicant form or personnel record contains a description of the reasonable accommodation.

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V. PHYSICAL AND MENTAL QUALIFICATIONS

41 CFR 60-300.44(c), 41 CFR 60-741.44(c)

UNIVERSIDAD CENTRAL DE BAYAMÓN reviews all physical and mental qualifications requirements as openings occur to ensure to the extent that qualifications requirements tend to screen out qualified disabled veterans and qualified individuals with disabilities, that they are job-related and consistent with business necessity and the safe performance of the job.

To the extent that physical or mental job qualification requirements tend to screen out qualified disabled veterans and qualified individuals with disabilities in the selection of employees or applicants for employment or other changes in employment status such as promotions or training, UNIVERSIDAD CENTRAL DE BAYAMÓN assures that the requirements are related to the specific job(s) for which the individual is being considered and are consistent with business necessity and the safe performance of the job.

VI. REASONABLE ACCOMMODATIONS

41 CFR 60-300.44 (d), 41 CFR 60-741.44 (d)

UNIVERSIDAD CENTRAL DE BAYAMÓN makes reasonable accommodations to the physical and mental limitations of employees or applicants to the extent that such accommodations not impose an undue hardship on the conduct of its business. When an employee known to be a disabled veteran or an employee with a known disability has significant difficulty performing his or her job and it is reasonable to conclude that the performance problem may be related to the known disability, the employee is confidentially notified of the performance problem and asked if the problem is related to the disability. If the employee indicates that the performance problems are related to his or her disability, the employee is asked if reasonable accommodation is needed.
VII. HARASSMENT

41 CFR 60-300.44(e), 41 CFR 60-741.44(e)

UNIVERSIDAD CENTRAL DE BAYAMÓN develops and maintains procedures to ensure that its employees are not harassed because of their status as a protected veteran or on the basis of a disability.

VIII. EXTERNAL DISSEMINATION OF POLICY

41 CFR 60-300.44(f), 41 CFR 60-741.44(f)

UNIVERSIDAD CENTRAL DE BAYAMÓN undertakes appropriate outreach and positive recruitment activities that are reasonably designed to effectively recruit protected veterans and individuals with disabilities, such as the following:

1. UNIVERSIDAD CENTRAL DE BAYAMÓN incorporates the Equal Opportunity Clause regarding protected veterans and individuals with disabilities in its purchase orders, leases and contracts as required by law, executive order and regulation. Written notification of the Equal Opportunity Policy is sent to all subcontractors, vendors, and suppliers requesting appropriate action on their part.

2. UNIVERSIDAD CENTRAL DE BAYAMÓN notifies all applicants of the EEO policy and invites them to self-identify. Application forms state UNIVERSIDAD CENTRAL DE BAYAMÓN's commitment to equal employment opportunity. All employment advertisements and notices to recruitment sources state this EEO policy.

3. Outreach and recruitment activities that may be undertaken as needed by UNIVERSIDAD CENTRAL DE BAYAMÓN include enlisting the assistance and support of the following persons and organizations in recruiting, and developing on-the-job training opportunities for protected veterans and individuals with disabilities, in order to fulfill its commitment to provide equal employment opportunity for such individuals:

07/01/14 to 06/30/15
Oficina de Veteranos
Condominio Medical Center Plaza
Suite LC 8A 9-10, Urb. La Riviera
Rio Piedras PR 00921
gmollina-laria@va.gov
Fax- 749-4416

Mrs. Rina Crespo
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P.O. Box 195540
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PR National Guard
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Universidad Católica de Ponce
Oficina de Recursos Humanos
Tel 787-798-3001
Fax- 787-798-6836

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4. All employment openings (except executive and top management, positions that are filled from within, and positions lasting five days or less) are listed at the appropriate state employment services office. Formal briefing sessions and facility tours may be conducted with representatives from recruiting sources to explain current and future job openings, position descriptions, worker specifications, and the selection process. Follow-up with these resources and feedback on disposition of applicants are conducted when appropriate.

5. UNIVERSIDAD CENTRAL DE BAYAMÓN develops internal communication of these outreach efforts in a manner that fosters understanding, acceptance, and support among executive management, supervisors, and all other employees.

6. Meaningful contacts are established with veteran's service organizations and organizations for individuals with disabilities for such purposes as advice, technical assistance and referral of potential employees. Such assistance may consist of advice concerning proper placement, recruitment, training and reasonable accommodation.

7. Good faith efforts are made to consider protected veterans and applicants with known disabilities for all available positions for which they may be qualified, to the extent practicable.

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8. Recruitment at educational institutions will include efforts to reach students who are protected veterans.

9. Recruitment programs established with schools incorporate efforts to reach students with disabilities.

11. Efforts are made to include individuals with disabilities when employees are pictured in consumer, promotional or help wanted advertisements.

IX. ASSESSMENT OF EXTERNAL OUTREACH AND RECRUITMENT EFFORTS

41 CFR Section 60-300.44(f)(3), 41 CFR Section 60-741.44(f)(3)

UNIVERSIDAD CENTRAL DE BAYAMÓN is in the process of implementing the review of the outreach and recruitment efforts it takes; in order to evaluate the effectiveness of these efforts in identifying and recruiting qualified protected veterans and qualified individuals with disabilities. Each evaluation will be documented, including at a minimum the criteria used to evaluate the effectiveness of each effort and the conclusion as to whether each effort and the totality of the efforts are effective. Among these criteria is the Data Collection Analysis for the current year. If UNIVERSIDAD CENTRAL DE BAYAMÓN concludes the totality of its efforts are not effective in identifying and recruiting qualified protected veterans and qualified individuals with disabilities, alternative outreach and recruitment efforts are identified and implemented.

X. INTERNAL DISSEMINATION OF POLICY

CFR 60-300.44(g), 41 CFR 60-741.44(g)

UNIVERSIDAD CENTRAL DE BAYAMÓN has developed the following internal procedures to communicate its obligation to engage in affirmative action efforts to employ and advance in employment protected veterans and qualified individuals with disabilities. These procedures are designed to foster understanding, acceptance, and support among executive, management, supervisory and other employees and to encourage such persons to take the necessary actions to meet this obligation.

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1. UNIVERSIDAD CENTRAL DE BAYAMÓN’s notices. The EEO policy statement is posted on the employee bulletin board and/or electronically in a manner and place that ensures that protected veterans and individuals with disabilities are informed of its content. This notice states the name of the EEO Coordinator, the support of top-level management towards this policy, and to whom questions, comments, or complaints should be directed. A statement is included that employees are protected from coercion, intimidation, interference or discrimination for filing a complaint or assisting in an investigation under the Acts. All required state and federal EEO notices are also posted on bulletin boards.

2. Other procedures implemented:
   a. UNIVERSIDAD CENTRAL DE BAYAMÓN’s overall commitment, top-level management support, and implementation of the plan is discussed with management personnel making clear the chief executive officer’s support for the affirmative action policy.
   b. Inform all employees and prospective employees of UNIVERSIDAD CENTRAL DE BAYAMÓN’s commitment to engage in affirmative action to increase employment opportunities for protected veterans and individuals with disabilities.
   c. Publicize it in the company communications, annual report and other media.
   d. Discuss the policy thoroughly in both employee orientation and management training programs.
   e. When employees are featured in employee handbooks or similar publications for employees, protected veterans and individuals with disabilities are included.

XII. AUDIT AND REPORTING SYSTEM

41 CFR 60-300.44(h), 41 CFR 60-741.44(h)

UNIVERSIDAD CENTRAL DE BAYAMÓN has designed, implemented and documented an audit and reporting system that:

1. Measures the effectiveness of the affirmative action program.

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2. Indicates any need for remedial action.

3. Determines the degree to which the objectives have been obtained.

4. Determines whether protected veterans and individuals with known disabilities have the opportunity to participate in all company sponsored educational, training, recreational, and social activities.

5. Measures compliance with the affirmative action program's specific obligations.

Where the affirmative action program is found to be deficient, corrective action is taken to bring the program into compliance.

**XII. RESPONSIBILITY FOR IMPLEMENTATION**

41 CFR 60-300.44(i), 41 CFR 60-741.44(i)

Elaine Núñez, Human Resources Director, has been designated to direct the activities of the affirmative action program. The EEO Official has the full support of Lilliam Negrón Colón, President in carrying out the UNIVERSIDAD CENTRAL DE BAYAMÓN affirmative action policy. The EEO Official is responsible for:

1. Developing policy statements, affirmative action programs, and internal and external communication to, include discussions with managers, supervisors, and employees to ensure the policies are followed.

2. Advising managers and supervisors that their work performance is evaluated, in part, on the basis of their affirmative action efforts.

3. Identifying and discussing with management any problem areas.

4. Developing with management solutions for any identified problem areas.

5. Serving as a liaison between UNIVERSIDAD CENTRAL DE BAYAMÓN and community groups, governmental agencies and vocational rehabilitation organizations.

6. Maintaining an audit and reporting system to monitor the progress of the affirmative action programs.

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7. Informing management of the latest developments in the affirmative action and equal employment opportunity area.

8. Serving as a liaison between UNIVERSIDAD CENTRAL DE BAYAMÓN and organizations for protected veterans and individuals with disabilities;

9. Assisting in career counseling for protected veterans employees and employees with disabilities;

10. Ensuring that the policy statement and required posters are posted on bulletin boards and/or electronic postings; and

11. Ensuring that employees placed through these policies are not harassed.

XIII. TRAINING

41 CFR 60-300.44(j), 41 CFR 60-741.44(j)

All personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes are trained to ensure the implementation of our commitments made in this affirmative action program.

XIV. DATA COLLECTION ANALYSIS

41 CFR Section 60-300.44(k), 41 CFR Section 741-44(k)

UNIVERSIDAD CENTRAL DE BAYAMÓN has begun documenting the following computations or comparisons pertaining to applicants and hires on an annual basis and maintains them for a period of three (3) years:

1. The number of applicants who self-identified as protected veterans pursuant to § 60-300.42(a), or who are otherwise known as protected veterans;

2. The number of applicants who self-identified as individuals with disabilities pursuant to § 60-741.42(a), or who are otherwise known to be individuals with disabilities (IWD);
3. The total number of job openings;

4. Total number of jobs filled;

5. The total number of applicants for all jobs;

6. The number of protected veteran applicants hired,

7. The number of applicants with disabilities hired; and

8. The total number of applicants hired.

Given that this is the first Affirmative Action Program after the changes in the regulation that became effective on March 24, 2014, UNIVERSIDAD CENTRAL DE BAYAMÓN is starting to put in place the processes that lead to the compilation of this data to have it established by the next affirmative action period.

XV. BENCHMARK FOR HIRING VETERANS

41 CFR Section 60-300.45

The benchmark is not a rigid and inflexible quota which must be met, nor is it to be considered either a ceiling or a floor for the employment of particular groups. The purpose of establishing benchmarks is to create a quantifiable method by which UNIVERSIDAD CENTRAL DE BAYAMÓN can measure its progress toward achieving equal employment opportunity for protected veterans. Benchmarks will be set on an annual basis using one of mechanism described below:

1. A benchmark equaling the national percentage of veterans in the civilian labor force as published and updated annually by the OFCCP.

Therefore, UNIVERSIDAD CENTRAL DE BAYAMÓN has established this benchmark at 7.2%, equaling the national percentage of veterans in the civilian labor force announced by the OFCCP.
XVI. UTILIZATION GOALS FOR INDIVIDUALS WITH DISABILITIES

41 CFR Section 60-741.45

The utilization goal is not a rigid and inflexible quota which must be met, nor is it to be considered either a ceiling or a floor for the employment of particular groups. OFCCP has established a utilization goal of 7% for employment of qualified individuals with disabilities for each job group in the contractor’s workforce, or for the contractor’s entire workforce where the workforce consists of 100 or less employees.

The purpose of the utilization goal is to establish a benchmark against which the contractor must measure the representation of individuals within each job group in its workforce, or within the contractor's entire workforce.

Given that this is the first Affirmative Action Program after the changes in the regulation that became effective on March 24, 2014, UNIVERSIDAD CENTRAL DE BAYAMÓN is starting to put in place the processes that lead to the evaluation on its utilization of individuals with disabilities in each job group for the next affirmative action period.

XVII. IDENTIFICATION OF PROBLEM AREAS

41 CFR Section 60-741.45(e)

When the percentage of individuals with disabilities in one or more job groups, or in our entire workforce if the workforce is 100 or less employees, is less than the utilization goal, UNIVERSIDAD CENTRAL DE BAYAMÓN will take steps to determine whether and where impediments to equal employment opportunity exist. When making this determination, we assess our personnel processes, the effectiveness of our outreach and recruitment efforts, the results of our affirmative action program audit, and any other areas that might affect the success of the affirmative action program.

UNIVERSIDAD CENTRAL DE BAYAMÓN has not found any current impediments to equal employment opportunity in our personnel processes, outreach and recruitment efforts or any other area that might affect the success of our affirmative action program.

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XVIII. ACTION ORIENTED PROGRAMS

41 CFR Section 60-741.45(f)

As needed, UNIVERSIDAD CENTRAL DE BAYAMÓN will develop action-oriented programs designed to correct any identified problems areas as needed. These action-oriented programs may include the modification of personnel processes to ensure equal employment opportunity for individuals with disabilities, alternative or additional outreach and recruitment efforts and/or other actions designed to correct the identified problem areas and attain established goals.

UNIVERSIDAD CENTRAL DE BAYAMÓN is working to put in place the processes that help identify any possible problem areas which will give way to the development of action oriented programs.