

# Affirmative Action Plan

Minorities and Women

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OCTOBER 2024 - SEPTEMBER 2025  
WESTVILLE CAMPUS



**PURDUE UNIVERSITY NORTHWEST**



**PURDUE UNIVERSITY NORTHWEST**

**Office of the Chancellor**

November 2024

To All Members of the Purdue University Northwest Community:

The University is committed to promoting an environment free from all forms of harassment and discrimination where all members can strive to reach their potential in the workplace and any University activity or program. Along with this commitment, we promote a culture of inclusivity, equal access, and equal opportunity for all University community members.

One example of this commitment is being dedicated to our responsibility as a federal contractor to take affirmative action efforts to ensure equal employment opportunity exists for applicants and employees. Specifically, the University promotes equal opportunity for recruitment, selection, advancement, and every other term and privilege associated with employment, without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, disability, or status as a protected veteran. Another example is the University's enforcement of the anti-harassment and nondiscrimination policies that comply with applicable federal and state laws and regulations.

The Office of Institutional Equity updates annually the Affirmative Action Plan for Minorities and Women and the Affirmative Action Plan for Veterans and Individuals with Disabilities. These plans comply with the Executive Order 11246, as amended, the Rehabilitation Act of 1973, as amended, and 38 U.S.C. Section 4212. Hard copies of these plans are available in the Office of Institutional Equity located in Lawshe Hall room 218 in Hammond and Schwarz Hall room 150 in Westville as well as the University Library located in the Student Union and Library Building room 200 in Hammond and the Library Student and Faculty Building room 206 in Westville. For questions regarding these plans, contact the Executive Director of the Office of Institutional Equity at (219) 989-3169.

Thank you for your commitment to ensuring that PNW continues to be a welcoming environment for all.

Sincerely,

A handwritten signature in black ink, appearing to read 'K. C. Holford'.

Kenneth C. Holford, Ph.D.

Chancellor

Purdue University Northwest

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# **PART I**

## **STATEMENT OF PURPOSE**

### **A. PURPOSE AND APPLICABILITY OF THE AFFIRMATIVE ACTION PLAN**

#### **1. Purpose**

Because the University is a federal contractor, it is required by federal law to develop a written affirmative action program to ensure equal employment opportunity. Federal regulations provide as follows:

An affirmative action program is a management tool designed to ensure equal employment opportunity. A central premise underlying affirmative action is that, absent discrimination, over time a contractor's workforce, generally, will reflect the gender, racial, and ethnic profile of the labor pools from which the contractor recruits and selects. Affirmative action programs contain a diagnostic component, which includes a number of quantitative analyses designed to evaluate the composition of the workforce and compare it to the composition of the relevant labor pools. Affirmative action programs also include action-oriented programs. If women and minorities are not being employed at a rate to be expected given their availability in the relevant labor pool, the contractor's affirmative action program includes specific practical steps designed to address this underutilization.

An affirmative action program also ensures equal employment opportunity by institutionalizing the commitment to equality in every aspect of the employment process. The purpose of the Affirmative Action Plan is to reaffirm Purdue University Northwest's continuing commitment to the principles of affirmative action and equal employment opportunity. In addition, the Affirmative Action Plan serves as a working document for reporting academic and staff personnel actions and apprising Purdue Northwest of information relevant to the development, analysis, enforcement, evaluation, dissemination, and monitoring of the plan and its policies.

#### **LEGAL BASIS**

This Affirmative Action Plan is developed in accordance with the requirements of Executive Order 11246, as amended, and the implementation guidelines published by the Office of Federal Contract Compliance Programs (OFCCP) in 41 CFR § 60-2. The plan is also adopted and implemented in good faith, in conformity with, and in reliance upon, the language of the Equal Employment Opportunity Commission Affirmative Action Guidelines (29 CFR § 1608.5).

Pursuant to 41 CFR 60-2.16, whenever the term "goal" is used, it is expressly intended that it should not be used to discriminate against any applicant or employee because of race, color, religion, sex, veteran status or national origin. Quotas are expressly forbidden and all goals are voluntarily adopted in a good faith effort to support affirmative action efforts.

## 2. Access to the Plan

Purdue Northwest prepares and renews this plan annually. The West Lafayette campus provides data from which workforce utilization reports are drawn. This plan is available online,<sup>1</sup> in the campus library, as well as in the Office of Institutional Equity, Room 218, Lawshe Hall at the Hammond location and Room 150, Schwarz Hall at the Westville location. Questions regarding this plan should be directed to the Office of Institutional Equity at oie@pnw.edu or 219-989-3169.

## 3. Applicability

Each regional campus of Purdue University develops and maintains its own affirmative action program with support from the Purdue West Lafayette Office of the Vice President for Ethics and Compliance. This plan applies to organizational units managed by or affiliated with Purdue University Northwest and reflects the plan adopted by the Purdue system.

## B. DEFINITIONS

**Discrimination**, within the context used in this Affirmative Action Plan, refers to the process of illegally differentiating between people on the basis of group membership rather than individual merit. **Individual discrimination**, which is unlawful, may result when a person is subjected to unequal treatment on the basis of race, religion, color, sex, age, national origin or ancestry, genetic information, marital status, parental status, sexual orientation, gender identity and gender expression, disability, or status as a veteran. **Systemic discrimination** may occur when two or more applicants or employees are subjected to unlawful employment discrimination.

The concept of **equal employment opportunity** proclaims the right of each person to apply and be evaluated for employment opportunities without regard to race, religion, color, sex, age, national origin or ancestry, genetic information, marital status, parental status, sexual orientation, gender identity and gender expression, disability, or status as a veteran. It guarantees everyone the right to be considered solely on the basis of the ability to perform the duties of the job in question, with or without reasonable accommodation(s).

The principle of **affirmative action** requires that federal contractors ensure non-discrimination and that aggressive efforts be utilized to employ and advance women and minorities in areas

where they are employed in fewer numbers than is consistent with their availability in the relevant labor market. The University's objective is to employ and promote the best person for the job.

## C. EQUAL EMPLOYMENT OPPORTUNITY OBJECTIVES

Purdue University Northwest's affirmative action plan is a management tool designed to help the University ensure equal employment opportunity for all persons. Purdue Northwest adopts the premise that, with effective implementation of affirmative action policies, over time the demographics of the Purdue Northwest workforce will reflect the gender, racial and ethnic profiles of the available workforce in the relevant labor market.

This plan incorporates a descriptive component through which Purdue Northwest's employment data is presented and compared to data reflecting the relevant workforce population. Prescriptive components are presented in findings and recommendation sections found throughout the plan.

In support of these considerations, specific equal employment opportunity objectives at the University include:

1. To recruit hire, train, and promote persons in all job classifications without regard to race, religion, color, sex, age, national origin or ancestry, genetic information, marital status, parental status, sexual orientation, gender identity and gender expression, disability, or status as a veteran, except where age or sex is a bona fide occupational qualification.
2. To make decisions within all stages of the employment process that will further the principles of equal employment opportunity.
3. To ensure that criteria for all personnel actions, including recruitment, hiring, promotion, granting of tenure, compensation, employee benefits, University sponsored education, selection for education, tuition assistance, recreation programs, transfer, demotion, layoff, return from layoff, discipline, termination, and all other terms, conditions, and privileges of employment are job-related and realistic.
4. To vigorously apply the principles of affirmative action to eliminate barriers and ensure equal opportunity in areas where there are placement goals for women and/or minorities.

# **PART II**

## **RESPONSIBILITY FOR IMPLEMENTATION AND REAFFIRMATION OF POLICY**

### **A. DESIGNATION OF RESPONSIBILITY**

At its meeting on January 21, 1970, the Board of Trustees reaffirmed and reinforced Purdue University's general policy of equal opportunity by approving a statement of policy and responsibility:

“The University is committed to maintaining an inclusive community that recognizes and values the inherent worth and dignity of every person; fosters tolerance, sensitivity, understanding, and mutual respect among its members; and encourages each individual to strive to reach his or her own potential. In pursuit of its goal of academic excellence, the University seeks to develop and nurture diversity. The University believes that variety among its many members strengthens the institution, stimulates creativity, promotes the exchange of ideas, and enriches campus life.

Acts of discrimination against any individual or group are wrong because they foster intolerance, incivility, and intimidation. The University does not condone and will not tolerate discrimination, harassment or intimidation of any individual in the University community for any reason. The University, through its actions, seeks to assure all its members of their rights to protections from the harmful effects of discrimination.

To meet its commitment under federal and state laws, the University also promulgates policies and programs to ensure that all persons have equal access to its educational programs, employment opportunities, facilities, and all other University activities without regard to race, religion, sex, color, national origin, ancestry, disability, status as a Vietnam era veteran, or age. Additionally, the University promotes the full realization of equal employment opportunity through its affirmative action program.

The President of the University is charged with overall responsibility for nondiscrimination and equal opportunity.”

In furtherance of the University's equal employment opportunity and affirmative action obligations, the preceding policy has been implemented through a number of actions, including issuance of Purdue University's Nondiscrimination Policy Statement<sup>2</sup> and the issuance of the Equal Opportunity, Equal Access and Affirmative Action Policy (III.C.2)<sup>3</sup>, most recently revised August 1, 2021. These policies can be accessed through the Office of Institutional Equity website.<sup>4</sup>



The University prohibits discrimination on the basis of race, religion, color, sex, age, national origin or ancestry, genetic information, marital status, parental status, sexual orientation, gender identity and expression, disability, or status as a veteran. Ultimate responsibility for compliance with the applicable nondiscrimination and affirmative action laws and policies rests with the Board of Trustees and with the University's executive officers.

## 1. Board of Trustees

The University is governed by a ten-member Board of Trustees appointed by the Governor of the State of Indiana. Its charge includes selecting the President of the University, deciding major policy lines, approving the financial program and budget, approving the President's nominations for major appointments, and approving all construction and major contracts. The members of the Board of Trustees are as follows: Lawrence "Sonny" Beck, Michael R. Berghoff (Chairman), Kevin Boes, JoAnn Brouillette, Theresa Carter, Vanessa Castagna, Malcolm DeKryger, Michael Klipsch, Gary J. Lehman (Vice Chairman), and Shawn A. Taylor.

## 2. Executive Staff, Line Management, and Supervisors

Dr. Kenneth C. Holford, Chancellor of Purdue University Northwest, reports directly to the University President and is responsible for the successful implementation of Purdue University Northwest's equal opportunity and equal access and its Affirmative Action Plan.

Vice chancellors and deans are responsible for establishing placement goals and action-oriented programs within their units and integrating equal opportunity and affirmative action principles and objectives into all employment-related decisions within their areas of responsibility. Vice chancellors and deans are also responsible for reviewing recommendations for hiring, compensation, promotion, transfer or reassignment, and termination to ensure compliance with the University's affirmative action program in both procedure and outcome, and for reviewing the qualifications of applicants and reasons for selection to ensure that minorities, women, veterans, and individuals with disabilities are given full opportunities for hire and promotion.

Department heads, directors, and supervisors are responsible for promoting equal employment opportunity and making good faith efforts to achieve affirmative action goals. Evaluations of administrators and supervisors will include their equal employment opportunity and affirmative action efforts and results.

### 3. Affirmative Action Officer

Deborah B. Trice, Associate Vice President for Compliance and Senior Associate Counsel, Regulatory Matters, reports directly to the Vice President for Ethics and Compliance and is responsible for developing, coordinating, and maintaining an annual Affirmative Action Plan for the West Lafayette campus and for providing assistance to the regional campus Affirmative Action Officers, including, but not limited to, the preparation of required state and federal reports, workforce analysis, and professional development. There is a designated Office of Institutional Equity at both Purdue Northwest campuses.

Laura Odom, the Executive Director of the Office of Institutional Equity reports directly to Chancellor Holford and is responsible for developing, executing, and monitoring the Affirmative Action Plan for Purdue University Northwest. Ms. Odom also serves as the Title IX Coordinator for Purdue University Northwest.

### 4. Cross Reference to Regulations

This plan is intended to comply with all relevant sections of 41 CFR § 60-2 (required contents of affirmative action programs for women and minorities).

# PART III

## ORGANIZATIONAL DISPLAY

### PURDUE NORTHWEST PROFILE, BY CAMPUS AND COMBINED

**Legend:**

- WF = White Female, WM = White Male
- AF = Asian Female, AM = Asian Male
- AIF = Am. Indian Female, AIM = Am. Indian Male
- BF = Black Female, BM = Black Male
- HF = Hispanic Female, HM = Hispanic Male
- PF = Hawaiian/Pacific Islander Female, PM = Hawaiian/Pacific Islander Male
- MF = Multiracial Female, MM = Multiracial Male
- UF = Unknown Female, UM = Unknown Male

Purdue University Northwest Westville Campus Organizational Profile	
<b>CHANCELLOR</b>	
CHANCELLOR = [REDACTED]	TOTAL HEAD COUNT = 5 [REDACTED]
<b>VICE CHANCELLOR FOR ACADEMIC AFFAIRS &amp; PROVOST</b>	
VICE CHANCELLOR/PROVOST = [REDACTED]	TOTAL HEAD COUNT = 81 [REDACTED]
<b>VICE CHANCELLOR FOR ADMINISTRATIVE SERVICES</b>	
VICE CHANCELLOR = [REDACTED]	TOTAL HEAD COUNT = 53 [REDACTED]
<b>VICE CHANCELLOR FOR INSTITUTIONAL ADVANCEMENT</b>	
VICE CHANCELLOR = [REDACTED]	TOTAL HEAD COUNT = 0
<b>VICE CHANCELLOR FOR ENROLLMENT MANAGEMENT &amp; STUDENT AFFAIRS</b>	
VICE CHANCELLOR = [REDACTED]	TOTAL HEAD COUNT = 16 [REDACTED]



# **PART IV**

## **JOB GROUP ANALYSIS**

### **A. EEO-6 CATEGORIES**

For the purpose of conducting meaningful workforce analyses, the University staff is first grouped by occupational duties into segments having broad similarities. These macro-groupings, called EEO-6 categories, are defined in the Higher Education Staff Information (EEO-6) Report for Public/Private Institutions of Higher Education that is issued by the Equal Employment Opportunity Commission. The categories and their corresponding two-digit identification codes used by the University reports are:

- 01 Ladder Rank Faculty (Tenure and Tenure-track Faculty), Clinical and Research Faculty
- 03 Non-Ladder Rank Instructional (Non-tenure Track Faculty)<sup>5</sup>
- 04 Student Assistants<sup>6</sup>
- 05 Executive, Administrative, Managerial
- 06 Professional
- 07 Secretarial and Clerical
- 08 Technical and Paraprofessional
- 09 Skilled Crafts
- 10 Service and Maintenance

### **B. JOB GROUPS (AAP CODES)**

Within each major category<sup>7</sup>, staff are subdivided into job groups, breaking them into segments with greater similarities, based on the criteria outlined in 41 CFR 60-2.12(b) and five additional criteria:

1. Jobs within a group have similar content, promotional opportunities, and wage rates or salary patterns.
2. Jobs within a group exhibit similar patterns for including males, females, and minorities.
3. Jobs within each group closely parallel the employment categories used in published data on the availability of minorities and women.
4. Job groups take into consideration the reporting structure of the organization.
5. Each job group contains a number of employees sufficient for valid statistical analyses.

Job group definitions were developed jointly by the staff of the Office of Institutional Equity and Human Resources.

Each job group is assigned a three-digit identification code, referred to as the AAP (Affirmative Action Plan) Code. A synopsis of the job groups within EEO-6 categories may be found [online](#)<sup>8</sup>. The full job group analysis is set forth in the tables below.

## C. PLACEMENT OF INCUMBENTS IN JOB GROUPS

In accordance with Department of Labor guidelines, the University categorizes each employee by job group in order to track the number and percentages of incumbents in job groups. The University’s Affirmative Action Plan sets forth the percentages of minority and female employees, by job group, in the tables listed below.

**TABLE 1: JOB GROUP ANALYSIS FOR FACULTY**

<b>Job Group</b>	<b>Female %</b>	<b>Male %</b>	<b>Minority %</b>	<b>Total Count</b>
Instructor Visiting	25%	75%	25%	4
Lecturer - Continuing	50%	50%	0%	6
Lecturer – Limited Term	72%	28%	12.5%	32
Professor	33%	67%	22%	9
Professor Assistant	50%	50%	50%	6
Professor Associate	31%	69%	28%	29
Professor Clinical Assistant	67%	33%	17%	6
Professor Clinical Associate	100%	0%	0%	2

**TABLE 2: JOB GROUP ANALYSIS FOR EXECUTIVE, MANAGERIAL, AND ADMINISTRATIVE**

<b>Job Group</b>	<b>Female %</b>	<b>Male %</b>	<b>Minority %</b>	<b>Total Count</b>
Building and Facilities	0%	100%	0%	1
Business Management	0%	100%	0%	1
Campus Safety	0%	100%	0%	1
Compliance	0%	100%	0%	1
Faculty – Tenure/Tenure Track	25%	75%	25%	4
Financial Aid	0%	100%	0%	1
Grounds	0%	100%	0%	1
Human Resources Business Partners	100%	0%	0%	1
Operations Support	100%	0%	0%	1
Program Administration	100%	0%	0%	1
Student Engagement	50%	50%	0%	2

**TABLE 3: JOB GROUP ANALYSIS FOR PROFESSIONAL STAFF**

<b>Job Group</b>	<b>Female %</b>	<b>Male %</b>	<b>Minority %</b>	<b>Total Count</b>
Accounting	67%	33%	0%	3
Admissions	100%	0%	0%	2
Benefits	100%	0%	0%	1
Business Management	100%	0%	0%	1
Compensation	100%	0%	0%	1
Compliance	0%	100%	50%	2
Continuing Education	100%	0%	0%	1
Dining Services	50%	50%	0%	2
Financial Aid	100%	0%	0%	2
IT Support	0%	100%	100%	1
Marketing and Public Relations	100%	0%	0%	1
Operations Support	100%	0%	50%	2
Program Administration	75%	25%	50%	4
Student Advising	75%	25%	25%	4
Student Engagement	100%	0%	33%	6



**TABLE 4: JOB GROUP ANALYSIS FOR CLERICAL AND SECRETARIAL STAFF**

<b>Job Group</b>	<b>Female %</b>	<b>Male %</b>	<b>Minority %</b>	<b>Total Count</b>
Accounting	100%	0%	0%	5
Administrative Operations	83%	17%	0%	12
Business Management	100%	0%	25%	4
Library Services	100%	0%	0%	2

**TABLE 5: JOB GROUP ANALYSIS FOR TECHNICAL AND PARAPROFESSIONAL STAFF**

<b>Job Group</b>	<b>Female %</b>	<b>Male %</b>	<b>Minority %</b>	<b>Total Count</b>
Assessment and Analysis	0%	100%	0%	1
Data Management	0%	100%	0%	1
Instruction	100%	0%	0%	1
IT Engineering and Development	100%	0%	0%	1
IT Support	0%	100%	0%	4
Police	0%	100%	25%	4

**TABLE 6: JOB GROUP ANALYSIS FOR SKILLED CRAFTS STAFF**

<b>Job Group</b>	<b>Female %</b>	<b>Male %</b>	<b>Minority %</b>	<b>Total Count</b>
Maintenance and Utilities	0%	100%	0%	1

**TABLE 7: JOB GROUP ANALYSIS FOR SERVICE AND MAINTENANCE STAFF**

<b>Job Group</b>	<b>Female %</b>	<b>Male %</b>	<b>Minority %</b>	<b>Total Count</b>
Building and Facilities	37.5%	62.5%	25%	8
Grounds	0%	100%	67%	3
IT Support	0%	100%	0%	1
Maintenance and Utilities	0%	100%	0%	4
Operations Support	100%	0%	0%	1

**TABLE 8: LADDER RANK FACULTY**

	<b>Total</b>	<b>Female</b>	<b>Black</b>	<b>Hispanic</b>	<b>Asian</b>	<b>Am Indian</b>	<b>Multiracial</b>
Liberal Arts	17	47%	6%	6%	12%	0%	0%
Engr/Math/Sciences	20	25%	5%	5%	20%	0%	0%
Technology	5	20%	0%	0%	40%	0%	0%
Management	3	33%	0%	0%	33%	0%	0%
Nursing	4	100%	0%	0%	0%	0%	0%
Education	3	67%	0%	0%	0%	0%	0%

**TABLE 9: EXECUTIVE, ADMINISTRATIVE, AND MANAGERIAL STAFF**

	<b>Total</b>	<b>Female</b>	<b>Black</b>	<b>Hispanic</b>	<b>Asian</b>	<b>Am Indian</b>	<b>Multiracial</b>
Executive, Admin & Managerial	15	33%	0%	0%	7%	0%	0%

**TABLE 10: PROFESSIONAL, CLERICAL, AND SERVICE STAFF**

	<b>Total</b>	<b>Female</b>	<b>Black</b>	<b>Hispanic</b>	<b>Asian</b>	<b>Am Indian</b>	<b>Multiracial</b>
Professional	33	79%	9%	12%	0%	0%	3%
Secretarial and Clerical	23	91%	0%	4%	0%	0%	0%
Technical & Paraprofessional	12	17%	0%	8%	0%	0%	0%
Skilled Crafts	1	0%	0%	0%	0%	0%	0%
Service and Maintenance	17	24%	6%	18%	0%	0%	0%

## D. DETERMINATION OF AVAILABILITY

In accordance with Department of Labor guidelines, the following factors are considered in developing an estimate of the availability of women and minorities for each job group:

1. The percentage of minorities and women with requisite skills in the reasonable recruitment area. The reasonable recruitment area is the geographical area from which the employer usually seeks or reasonably could seek employees to fill the positions in a job group.
2. The percentage of minorities and women among those promotable, transferable, and trainable employees within the employer's organization.

Availability estimates are determined in the following manner: data is sought from reliable published sources on the race, ethnicity, and sex composition of the potential pool relevant to the job group in question. For example, sources for the data used to calculate the availability estimates may include: counts of doctorate degrees by field (faculty); counts of master's and bachelor's degrees in relevant fields (administrative and professional); union members and technical school graduates (skilled crafts); and census data and local employment counts (technical, clerical, and service). The raw data by race, ethnicity, and sex is then weighted according to the best estimates of the proportions of hires made from each pool, so that the sum of factor weights (expressed as a percentage) is 100 percent.

An estimation of the proportion is drawn from each pool using input from all units having substantial numbers of staff in the job group. Then, computer files are built containing basic information on raw percentages and the weighting factors. A computer program is used to calculate weighted estimates for each job group, incorporating the required factors.

In the determination of weights, the relevance and applicability of the data obtainable for each pool are important considerations. Specifically, if the source combines several disciplines, because of the small total numbers involved in each, and the proportions of each protected class in the different disciplines are widely spread, the reliability of the source to reflect the true composition of the pool is in question. In such cases, the weighting of that pool would be lowered and the weighting of a more accurate pool would be increased, until better data becomes available.

Once they are computed, the availability estimates give participation standards against which to measure proportions of females and minorities in each job group in the University's workforce.

## E. DISSEMINATION OF PLACEMENT GOALS TO UNITS

Pursuant to the Equal Opportunity, Equal Access and Affirmative Action Policy (III.C.2),<sup>9</sup> the responsibility for disseminating this information to department and unit heads and to hiring supervisors rests with the respective Deans and Vice Chancellors.

## F. CORPORATE SELECTION DECISIONS

OFCCP Order No. 830a1 (June 14, 1988) requires that affirmative action analysis and efforts will be focused where the authority and responsibility for filling positions is located. This means that high level executive and managerial titles are to be pooled together regardless of locality for review in this document.

The University is a multi-site university system, which includes the regional campuses of Fort Wayne, Hammond, and Westville. While these campuses function with a degree of autonomy, as granted by the Board of Trustees, hiring decisions for certain high-level positions are made from the President's, or Executive Vice President and Treasurer's offices in West Lafayette.

When the position of Chancellor is vacant, the Faculty Senate of the respective campus elects a committee to aid the President in filling the vacancy. Typically, this committee assists in the recruitment of candidates, is involved in the interviewing process, and ultimately makes a recommendation to the President with regard to their ranking of the candidates for final approval.

The appointment of the Chief Business Officer of each regional campus is a shared hiring decision. Each of the Chief Business Officers, who hold the title of Vice Chancellor, has a joint appointment with, and reports directly to, the Chancellor of the respective campus and the Executive Vice President and Treasurer located at the West Lafayette Campus. Recruitment, interviewing, and selection activities are mutually coordinated between the campuses.

The affirmative action analysis of recruitment efforts for these positions is addressed at the West Lafayette campus. The availability statistics are derived from data based on the number of people in executive positions nationwide and the number of people at the University who are eligible for promotion to this level.

## G. COMPARING INCUMBENCY TO AVAILABILITY

Once availability has been determined, the utilization analysis is a simple yes or no query. Each job group's minority and female availability percentage is compared to the percentage of minority and female incumbents in that job group. If the percentage of incumbents is equal to or greater than the relevant availability percentage, then that job group is at "parity" with

availability, and no underutilization is present. If the percentage of female or minority incumbents falls below the relevant availability percentage, the job group is at “disparity” (being underutilized) and placement goals are set equal to the number of additional incumbents needed to eliminate the underutilization. This comparison is demonstrated in tables below.

## 1. The “Whole Person” Rule

In every job group where an underutilization is found, placement goals are set for the entire campus and for each major organizational unit. A placement goal is defined as the University-established target, which the University makes a good-faith effort to achieve. Separate annual placement goals are set for minorities and females.

A job group is considered underutilized, and a placement goal is set, according to the “whole person” rule, that is, where the underutilization for females, or for minorities, respectively, rounds to at least one person.

- **PLACEMENT GOALS FOR LADDER RANK FACULTY (TENURE)**

For ladder rank faculty, the utilization analysis will determine whether minorities and/or females are underutilized in the various academic departments.

- **PLACEMENT GOALS FOR NON-LADDER RANK INSTRUCTIONAL FACULTY (NON-TENURE)**

Non-ladder rank faculty hold positions of a limited duration. Pursuant to OFCCP guidelines, setting placement goals for temporary employees is not required. Accordingly, no placement goals are set for non-ladder rank faculty.

- **PLACEMENT GOALS FOR NON-FACULTY AREAS**

Placement goals are established for all regular non-faculty job groups campus-wide and in each unit where there is underutilization of minorities and/or females. Each unit should be aware of campus placement goals and consider them in their hiring efforts.

## 2. Placement Goals: Three-Year Cycle

Pursuant to 41 CFR 60-2.16, whenever the term “placement goal” is used, it is expressly intended that it should not be used to discriminate against any applicant or employee because of race, color, religion, sex, national origin, or ancestry. All placement goals are voluntarily

adopted in a good-faith effort to support affirmative action efforts. Where placement goal commitments exceed the percentage estimates of availability, the University acknowledges that these are not required by OFCCP or by order of any court.

Affirmative action placement goal setting at the University is done on a three-year cycle. This cycle grants each unit a longer horizon in which to develop and carry out their objectives. Each organizational unit must adopt one or more specific, realistic commitments to be accomplished during the three-year period. Commitments include both percentage placement goals for any job groups that are significantly underutilized and programmatic goals. Other problem areas should also be targeted for commitment and action on behalf of females, minorities, veterans, and persons with disabilities.

Tables which summarize campus-wide placement goals for the current Affirmative Action Plan year can be found in this plan. The tables also display the percentage of females and/or minorities required to achieve full utilization.

**TABLE 11: UTILIZATION ANALYSIS, COLLEGE OF HUMANITIES, EDUCATION, AND SOCIAL SCIENCES FACULTY**

	<b>Total 2024</b>	<b>Minority: % Avail</b>	<b>Minority: Present % 2024</b>
Liberal Arts	17	19%	23.5%
Education	3	25%	0%
	<b>Total 2024</b>	<b>Females: % Avail</b>	<b>Females: Present % 2024</b>
Liberal Arts	17	56%	47%
Education	3	68%	67%

**TABLE 12: UTILIZATION ANALYSIS, COLLEGE OF BUSINESS FACULTY**

	<b>Total 2024</b>	<b>Minority: % Avail</b>	<b>Minority: Present % 2024</b>
Management	3	23%	33%
	<b>Total 2024</b>	<b>Females: % Avail</b>	<b>Females: Present % 2024</b>
Management	3	34%	33%

**TABLE 13: UTILIZATION ANALYSIS, COLLEGE OF ENGINEERING AND SCIENCES FACULTY**

	<b>Total 2024</b>	<b>Minority: % Avail</b>	<b>Minority: Present % 2024</b>
Engineering/Math/Sciences	20	24%	35%
	<b>Total 2024</b>	<b>Females: % Avail</b>	<b>Females: Present % 2024</b>
Engineering/Math/Sciences	20	42%	25%

**TABLE 14: UTILIZATION ANALYSIS, COLLEGE OF NURSING FACULTY**

	<b>Total 2024</b>	<b>Minority: % Avail</b>	<b>Minority: Present % 2024</b>
Nursing	4	16%	0%
	<b>Total 2024</b>	<b>Females: % Avail</b>	<b>Females: Present % 2024</b>
Nursing	4	91%	100%

**TABLE 15: UTILIZATION ANALYSIS, COLLEGE OF TECHNOLOGY FACULTY**

	<b>Total 2024</b>	<b>Minority: % Avail</b>	<b>Minority: Present % 2024</b>
Technology	5	28%	40%
	<b>Total 2024</b>	<b>Females: % Avail</b>	<b>Females: Present % 2024</b>
Technology	5	17%	20%

**TABLE 16: UTILIZATION ANALYSIS**  
**ALL JOB CATEGORIES**

	<b>Total 2024</b>	<b>Minority: % Avail</b>	<b>Minority: Present % 2024</b>
Exec, Admin & Managerial	15	16%	7%
Professional	33	14%	24%
Secretarial and Clerical	23	8%	4%
Technical & Paraprofessional	12	14%	8%
Skilled Crafts	1	10%	0%
Service and Maintenance	17	14%	24%
	<b>Total 2024</b>	<b>Females: % Avail</b>	<b>Females: Present % 2024</b>
Exec, Admin & Managerial	15	55%	33%
Professional	33	63%	79%
Secretarial and Clerical	23	90%	91%
Technical & Paraprofessional	12	28%	17%
Skilled Crafts	1	16%	0%
Service and Maintenance	17	40%	24%

## H. PLACEMENT GOALS

**TABLE 17: WESTVILLE CAMPUS PLACEMENT GOALS**

<b>Ladder Rank Faculty by Area</b>	<b>Female Underutilization</b>	<b>Minority Underutilization</b>
Liberal Arts	2	0
Engr/Math/Sciences	3	0
Technology	0	0
Management	0	0
Nursing	0	1
Education	0	1
<b>Staff by Job Group</b>	<b>Female Underutilization</b>	<b>Minority Underutilization</b>
Executive, Admin, & Managerial	3	1
Professional	0	0
Secretarial and Clerical	0	1
Service and Maintenance	3	0
Skilled Crafts	0	0
Technical & Paraprofessional	1	1



# **PART V**

## **IDENTIFICATION OF PROBLEM AREAS AND CORRECTIVE ACTION**

In order to identify problem areas, an in-depth analysis of several reports and processes is customarily made, paying particular attention to the patterns revealed by the distribution of minorities and females in various job groups. This section lists the analytical steps used to identify potential problem areas within the faculty job group, the executive, administrative, and managerial job group, and non-faculty and non-administrative job groups, and briefly summarizes some of the findings and corrective actions being made.

### **A. WORKFORCE ARRAY AND WORKFORCE ANALYSIS**

The workforce array provides an overview of areas where females and minorities are and are not employed. This listing is mandated by OFCCP and displays all job titles in each department ranked from lowest to highest paid within each EEO-6 category. Each job title line gives the salary range, the total number of incumbents, and the total number of male and female incumbents for each racial group. The workforce analysis is based on workforce data from the period October 1, 2023 through September 30, 2024, as displayed in a “snapshot file” prepared in October 2024.<sup>10</sup> This analysis is reviewed for potential problem areas, such as underrepresentation of minorities and females. Pay differences, concentrations, and focus job titles may also be determined from the workforce array.

#### **1. Tenured, Tenure Track, Clinical and Research Faculty**

The faculty job group is comprised of individuals who engage in teaching, research, or hold academic positions that directly support these activities.

#### **WORKFORCE COMPOSITION**

For the period between October 2023 and September 2024, data for the Westville campus shows the following for faculty:

Overall, there was a decrease of 6 in the total number of Ladder Rank Faculty from 58 in 2023 to 52 in 2024.

The number of female Ladder Rank Faculty decreased by 3, from 24 to 21.

The number of minority faculty remained the same from 2023 to 2024. There are 14 minority Ladder Rank Faculty. Of the Ladder Rank Faculty, 14 are minorities: 2 are Black, 2 are Hispanic, 9 are Asian, and 1 is Other.

**Findings:**

- For the October 2023 to September 2024 period, the number of female faculty decreased by 3.
- For the October 2023 to September 2024 period, the number of minority faculty remained the same at 14.

**Recommendations:**

- The Office of Institutional Equity will continue to monitor placement goal setting activity in each academic college and will communicate with the hiring supervisors regarding the underutilizations.
- The Office of Institutional Equity will continue to research and provide recruitment resources and education regarding effective recruitment and retention activities.
- Each academic department where underutilizations exist will be strongly encouraged to develop recruitment strategies for attracting more females and/or minority candidates.
- The Office of Institutional Equity will work with the Vice Chancellor for Academic Affairs and Provost to develop a recruitment model that involves developing and fostering relationships with regional and national institutions of Higher Education to use as potential recruitment resources.

**HIRES**

For 2023-2024, Purdue University Northwest hired 10 ladder rank faculty members. Of these, 6 are women and 6 are minorities.

**TABLE 18: NEW FACULTY HIRES BY GENDER AND RACE/ETHNICITY**

	Female	Male	Black	Hispanic	Asian	Am Indian	Multi-racial	Other	White	Total
Assistant Professor	5	4	2	1	2	0	0	0	4	9
Clinical Assistant Professor	1	0	0	1	0	0	0	0	0	1

## PROMOTIONS

Tenure and tenure-track faculty promotions in 2023-2024 for Purdue University Northwest consisted of the following:

Associate to Professor: 3 associate professors were promoted to full professor; 1 is female and 2 are minorities.

Assistant to Associate: 2 assistant professors were promoted to associate professor; 2 are females.

Detailed data regarding promotions by gender and race/ethnicity is available in Table 19 below.

**TABLE 19: FACULTY PROMOTIONS BY GENDER AND RACE/ETHNICITY**

	Female	Male	Black	Hispanic	Asian	Am Indian	Multi-racial	Other	White	Total
Professor	1	2	0	1	0	0	0	1	1	3
Associate Professor	2	0	0	0	0	0	0	1	1	2

## TERMINATIONS

For the Westville campus, there were 6 ladder rank faculty terminations in 2023-2024. Of these, 4 were female, 1 was Asian. Of the 6 terminations, 4 were due to retirements and 2 were due to other termination causes.

## 2. Non-Tenure Track Instructional Faculty

Non-Tenure Track Instructional Faculty includes visiting faculty, post-doctoral research associates, and other non-tenure track positions that by definition are intended to be positions of a limited duration. Non-Tenure Track Instructional Faculty are included as part of the workforce summaries, but placement goals are not established for this group.

## WORKFORCE COMPOSITION

For the period between October 2023 to September 2024, data shows at the Westville campus the following for non-tenure track faculty:

There are 42 non-tenure track instructional faculty, representing a decrease of 1, from 43 to 42.

The number of female non-tenure track faculty decreased by 4, from 31 to 27.

Of the total of 42, 5 of the non-tenure track instructional faculty are minorities and are distributed as follows: 4.8% are Black; 4.8% are Hispanic; and 2.4% are Multiracial. The number of minority non-tenure track faculty decreased by 5, from 10 to 5.

### 3. Executive, Administrative, and Managerial

#### **WORKFORCE COMPOSITION**

For the period of October 2023 to September 2024, data for the Westville campus shows the following for Executive, Administrative, and Managerial staff:

The total number of Executive, Administrative, and Managerial staff increased by 2, from 13 to 15.

The total number of females at the Executive, Administrative, and Managerial staff remained the same at 5.

The number of minorities at the Executive, Administrative, and Managerial staff decreased by 1, from 2 to 1. Minority staff in this category consist of 6.7% Asian.

#### **Findings:**

- The number of females in this category remained the same.
- The number of minorities in this category decreased by 1.
- There was no statistically significant adverse impact against women or minorities in these job groups.
- For the Westville campus, there is a female underutilization of 3 and a minority underutilization of 1 in Executive, Administrative, and Managerial staff.

#### **Recommendations:**

- As positions become available, the hiring supervisors will be made aware of applicable placement goals.
- The Office of Institutional Equity and the Human Resources Department will assist in researching and developing appropriate recruitment resources.
- The University will explore the possibility of using search firms, where feasible, during searches related to vacancies in this job group to increase the quality and diversity of the applicant pool.
- The Office of Institutional Equity will devise strategies to evaluate searches completed to fill vacancies in this job group to assess the extent to which diverse applicant pools are achieved at the beginning of the searches and to review how the

diversity of applicant pools change as each search progresses. As appropriate, the Office of Institutional Equity will provide feedback to the search committees.

## **PROMOTIONS AND TRANSFERS**

University practice encourages transfers and promotions to further employee growth and development.

## **TERMINATIONS**

Human Resources monitor terminations.

For the October 2023 to September 2024 period, on the Westville campus, there were 3 terminations for the Executive, Administrative, and Managerial job groups. Of these, 2 were female and 1 was Black.

### **Findings:**

- For the October 2023 to September 2024 period, there was no adverse impact against women or minorities in the Executive, Administrative, and Managerial job groups.

### **Recommendations:**

- No corrective action is required.

## **4. Professional, Clerical and Secretarial, Technical and Paraprofessional, Skilled Crafts, and Service and Maintenance Staff**

### **WORKFORCE COMPOSITION**

For the period between October 2023 to September 2024, data for the Westville campus shows the following for Professional, Clerical and Secretarial, Technical and Paraprofessional, Skilled Crafts, and Service and Maintenance staff:

For this group, the total headcount decreased by 5, from 91 to 86.

The number of females decreased by 3, from 56 to 53, and the number of minorities decreased by 1, from 15 to 14.

Professional – The number of females in this category increased by 1, from 25 to 26. Of the Professional staff, 8 are minorities: 9% are Black, 12% are Hispanic, and 3% are Multiracial. The minority staff decreased by 1, from 9 to 8.

Clerical and Secretarial – The number of females in this category increased by 2, from 19 to 21. The minority staff increased by 1, from 0 to 1. Of the Clerical and Secretarial staff, 4% are Hispanic.

Technical and Paraprofessional - The number of females in this category increased by 1, from 1 to 2. Of the Technical and Paraprofessional staff, 8% are Hispanic. Minority staff remained the same at 1.

Skilled Crafts – The number of females and minorities in this category remained at 0.

Service and Maintenance - The number of females in this category decreased by 7, from 11 to 4. Of the Service and Maintenance staff, 4 are minorities: 6% are Black and 18% are Hispanic. Minority staff in this category decreased by 1, from 5 to 4.

**Findings:**

- For the Westville campus, there is no female underutilization in the Professional, Secretarial and Clerical, and Skilled Crafts Job Groups.
- For the Westville campus, there is no minority underutilization in the Professional, Service and Maintenance, and Skilled Crafts Job Groups.
- For the Westville campus, there is minority underutilization of 1 in Secretarial and Clerical and 1 in Technical and Paraprofessional Job Groups.
- For the Westville campus, there is female underutilization of 3 in Service and Maintenance and 1 in Technical and Paraprofessional Job Groups.
- From 2023 to 2024, the Westville campus met two Placement Goals for Professional, Clerical and Secretarial, Technical and Paraprofessional, Skilled Crafts, and Service and Maintenance. The Placement Goal of 2 female decreased to 1 for the Technical and Paraprofessional Job Group. The Placement Goal of 2 minority decreased to 1 for the Secretarial and Clerical Job Group.

**Recommendations:**

- The Office of Institutional Equity and the Human Resources Department will continue to assist in researching and expanding recruitment resources for all job categories.
- The hiring departments or units must demonstrate good faith efforts by posting positions at sites that will assist in finding qualified minority and/or female candidates.
- The Office of Institutional Equity will devise strategies to evaluate searches completed to fill vacancies in these job groups to assess the extent to which diversity applicant pools are achieved at the beginning of the searches and to review how the

diversity of applicant pools change as each search progresses. As appropriate, the Office of Institutional Equity will provide feedback to the search committees.

## **PROMOTIONS AND TRANSFERS**

University practice encourages transfers and promotions to further employee growth and development.

## **REDUCTIONS IN FORCE**

### **Findings:**

- For the Westville campus, there was no reduction in force in the Professional, Clerical and Secretarial, Technical and Paraprofessional, Skilled Crafts, and Service and Maintenance job groups.

## **TERMINATIONS**

Human Resources and the Office of Institutional Equity monitor terminations. For the Westville campus, there were 13 terminations: 10 resignations, 2 retirements, and 1 discharged.

### **Findings:**

- For the October 2023 to September 2024 period, there was no adverse impact against women or minorities in the Professional, Clerical and Secretarial, Technical and Paraprofessional, Skilled Crafts, and Service and Maintenance staff group.

### **Recommendations:**

- No corrective action is required.

## **B. JOB GROUP ANALYSIS**

The Human Resources Department has developed a system of classification for jobs called the Job Classification Code. In this system, jobs are grouped on the basis of similar skills, similar pay, and potential for upward mobility. The Job Classification Codes are, in turn, clustered to form AAP Codes. The Job Group Analysis lists each employee in the job group, and is the only report currently produced which shows each person's educational level and discipline along with job title and salary. This analysis is also completed during the yearly report generating cycle.

## C. EVALUATION OF SELECTION PROCESS

Purdue University Northwest observes the requirements of the Uniform Guidelines on Employee Selection Procedures (UGESP). Where adverse impact is indicated, the applicant flow data, selection criteria, and all elements of the selection process are reviewed to ensure that only job-related, non-discriminatory factors were considered in making employment decisions, and that minorities and females received equal opportunities during the selection process. Selected officials are informed of the need to take corrective action when adverse impact is found in the recruitment or selection process.

### 1. Job Requirements and Descriptions

The Human Resources Department maintains a job description file which lists the requirements for every benefits eligible position at Purdue University Northwest and reviews them when there is a position vacancy and when other circumstances dictate. In addition, reviews may be requested by a unit supervisor or by the Office of Institutional Equity. Department Heads, with the approval of the respective College Dean create faculty job descriptions to incorporate the standard responsibilities along with the necessary knowledge, skills and abilities required to perform the essential functions of the job. The Office of Institutional Equity reviews these descriptions prior to posting and advertising. The Director of Employment and Compensation reviews the staff position description to ensure the knowledge, skills, and abilities required are adequate in order to perform the essential functions of the position.

### 2. Referral Procedures

After a faculty position has been posted and/or advertised, the Deans, Department Heads, and/or Search and Screen Committee Chairs refer the credentials of all applicants to the Search and Screen Committee in the relevant academic department. For the Executive, Administrative, and Managerial job group and the non-faculty and non-administrative job groups, the Human Resources Department refers those that self-identify as meeting the minimum qualifications, including those who may fulfill affirmative action placement goals, to the hiring department. Applicants who make initial contact with a department are directed to the Human Resources Department, where they are instructed on how to apply for positions at Purdue University Northwest.

### 3. Pre-employment Inquiries

Federal laws do not expressly prohibit inquiries concerning race, color, religion, sex, ancestry, or national origin, but the EEOC regards such inquiries as potentially discriminatory. Sections 503 and 504 of the Rehabilitation Act of 1973 and Title I of the Americans with Disabilities Act



of 1990 limit the use of pre-employment inquiries and medical examinations. Specifically, any identification of a disability by inquiry or examination during the pre-offer stage, including all job pre-tests, reference checks, interview form questions, and other information gathering procedures, is prohibited. Recent changes to Section 503 require the University to offer applicants the chance to voluntarily self-disclose their status as a person with a disability during the pre-offer and post-offer stages of job searches.

**Findings:**

- Search and Screen Committees possess continually greater awareness that they are responsible for promoting equal employment opportunity and making good faith efforts to achieve affirmative action. All Faculty Search Committee participants are required to participate in education regarding the process to use in effectively communicating the University's commitment to equal employment opportunity.
- In 2024, the Office of Institutional Equity and the Office of the Vice Chancellor for Academic Affairs enhanced the Faculty Search and Screen training.
- Faculty search committee members are required to participate in the Faculty Search Committee Training every three years. This training reviews effective employment practices that promote and support equal employment opportunity and affirmative action.
- The Human Resources Department meets with hiring supervisors and search chairs of staff vacancies to review the hiring, classification and compensation processes as well as helpful tools in order to conduct a successful search.

**Recommendations:**

- Search and Screen committees will continue to utilize the resources available to them in adhering to equal employment opportunity laws, policies, and procedures to ensure equitable evaluation of all potential candidates.
- The Office of Institutional Equity will continue to monitor progress through annual evaluation and reporting.
- The Office of Institutional Equity will explore ways to expand the search and screen evaluation process to searches pertaining to faculty positions.

## D. RECRUITMENT

### 1. Appropriateness of Outreach

The Office of Institutional Equity reviews recruitment efforts for faculty position vacancies. Recruitment of Administrative/Professional staff is a joint responsibility of the hiring department and the Human Resources Department. Recruitment efforts are judged on the scope of advertising for the position. Departments are to make good faith efforts in their

recruitment processes, actively seeking out minorities and females, particularly in those areas where they are underutilized.

**Findings:**

- Since January 2019, Purdue University has utilized Success Factors, a software for Human Capital Management. This system prompts applicants to complete a Self Identification survey on a voluntary basis. Applicants may indicate, confidentially, their race/ethnicity and gender. The responses are collected and maintained, and are manually reviewed in order to obtain applicant response information for all positions. The information is then available to the Office of Institutional Equity upon request, as required for reporting and compliance purposes.

**Recommendations:**

- The Office of Institutional Equity will continue reviewing the data on a periodic basis to identify whether recruitment efforts (including outreach efforts to minority and female candidates) need to be revised in order to increase for the number of minority and female applicants.

## 2. Review of Sources

The Office of Institutional Equity assists departments in their recruitment efforts where possible. Departments, however, should be familiar with the principal sources specific to their particular area of expertise and respective disciplines.

**Findings:**

- Academic departments are becoming more familiar with the full range of recruitment sources.
- Search committee chairs have shown due diligence in posting position vacancies in more minority and gender-specific publications.
- Although some improvement has occurred, comprehensive analysis regarding the use of recruitment sources and their subsequent effectiveness must continue.

**Recommendations:**

- The recruitment resource listing will be evaluated and updated with current information.
- The Office of Institutional Equity will explore ways in which the system it has developed for tracking and evaluating completed searches can be used to identify gaps in recruitment resources.

## E. COMPOSITION OF APPLICANT POOLS

For ladder rank, or tenure-track faculty, departmental staff, acting as recruiters while guided by Human Resources and fiscal approvers, initiates and coordinates the applicant flow within SuccessFactors. The role for which the Office of Institutional Equity joins the interface, at specific points along the hiring process, consists of an initial review for Equal Opportunity and Non-Discrimination language within the job posting, and also includes the initiation of the background checks for faculty candidates who have accepted an offer of employment with Purdue Northwest.

In order to determine areas of possible adverse impact on protected groups, an analysis of the selection rates should be conducted each year by race, ethnicity, and gender within each EEO-6 category, using the format outlined in the OFCCP Compliance Manual. SuccessFactors, and the data available from it, would be best shared between Human Resources and the Office of Institutional Equity for a collaboration towards this goal.

The Human Resources Department maintains information on the flow of all non-faculty applicants. In order to determine areas of possible adverse impact on protected groups, an analysis of the selection rates is conducted after each search, by race, ethnicity and gender within each EEO-6 category, using the format outlined in the OFCCP Compliance Manual.

## F. SALARY STUDIES

The Senior Leadership Team reviews merit increase data to determine if there is any disparity that cannot be justified. Any reports of salary inequities based on gender, race, or ethnicity are handled on a case-by-case basis.

Human Resources Department will work with each department's Dean and the Senior Leadership Team to check and explain all faculty or staff members' pay where apparent inequities may exist.

## G. BENEFITS

Purdue University Northwest offers a generous benefit package which can be tailored to the personal needs of the employee. Access to benefits is available to each faculty and staff member without regard to gender, race, or other protected class status.

## H. SENIORITY PRACTICES, UNION AGREEMENTS AND LINES OF PROGRESSION

Purdue University Northwest has no seniority system, no current union contracts, and maintains no lines of progression for staff. The University has formal tenure-track and promotional procedures in place for faculty.

## I. APPRENTICESHIP PROGRAMS

The University currently has no operative formal apprenticeship programs. If any are created or reactivated, minority and female selection ratio analysis will be conducted.

## J. EDUCATION

### 1. Faculty

All educational opportunities for faculty are open to participation by females and minorities. The Vice Chancellor for Academic Affairs and Provost offers numerous professional development programs, such as, the Center for Faculty Excellence, which help faculty to improve and innovate their teaching. In addition, academic departments offer professional development opportunities to faculty including attendance at seminars and workshops locally, regionally, nationally and globally.

#### **Findings:**

- Reports showing the attendance or participation of faculty in these programs are available through the Office of the Vice Chancellor of Academic Affairs and Provost.

### 2. Executive, Administrative, and Managerial, Professional Non-Faculty, Clerical and Secretarial, Technical and Paraprofessional, Skilled Crafts, and Service and Maintenance Staff

All educational programs offered through the University are open to participation by females and minorities. The programs include: Human Resources sponsored training programs and Office of Institutional Equity Title IX training. In addition, departments at the University offer additional educational opportunities for their staff including attendance at local, regional, national, and international conferences and workshops.

**Findings:**

- Information about participation in Human Resources sponsored professional development opportunities is maintained by the Human Resources Department.

**Recommendations:**

- The Office of Institutional Equity will review this data to ensure females and minorities have equal access to these development opportunities.

## K. WORKFORCE ATTITUDES

Dissemination of the University's policy on affirmative action and distribution of affirmative action and diversity related documents is accomplished via the Purdue University Northwest website and the Office of Institutional Equity website. This information is also included in new employee orientation and department level training.

**Findings:**

- The PRIDE Team (PNW Respecting Inclusion, Diversity and Equity) is part of the University's commitment to create an equitable environment, celebrate diversity, and encourage inclusiveness in the campus community. The team's role is to encourage and influence training and professional development decisions that will support Purdue University's nondiscrimination, anti-harassment, equal opportunity and equal access policies.
- The Office of Institutional Equity has developed specialized training addressing Title IX, Equity policies, and Diversity issues. The training has been delivered to Coaches, Resident Hall Advisors, faculty and staff.

**Recommendations:**

- Once developed, the PRIDE Team will use feedback received from University sponsored Diversity and Inclusion events and programs and other sources to develop recommendations to the Senior Leadership Team for additional diversity and inclusion programming. It is believed that through this continued process of quality improvement, effective strategies will be developed to address identified areas of concern.
- University policies on affirmative action and equal employment opportunity will continue to be presented and explained to new employees, new faculty members and new non-tenured faculty to ensure understanding, consistency and compliance.

## L. COMPLAINTS AND GRIEVANCES

Faculty have access to the University grievance procedures to resolve claims related to University action or decision related to his or her employment as outlined by the Faculty Grievances Policy (I.B.1)<sup>11</sup>.

Administrative, professional, clerical, and service staff members have access to the Dispute Resolution for Administrative/Professional and Clerical/Service Staff Members Policy (VI.D.1) and procedures<sup>12</sup>.

All employees bringing complaints alleging discrimination are processed pursuant to the Equal Opportunity, Equal Access and Affirmative Action Policy (III.C.2)<sup>13</sup>. Individuals are directed and encouraged to use the procedures established for filing such complaints, as indicated in the Procedures for Resolving Complaints of Discrimination and Harassment<sup>14</sup> available online. In these cases, the Office of Institutional Equity will participate in investigating and resolving the issue.

Complaints alleging harassment are processed in accordance with the Anti-Harassment Policy (III.C.1)<sup>15</sup>, the Procedures for Resolving Complaints of Discrimination and Harassment<sup>16</sup>, the Title IX Harassment Policy (III.C.4)<sup>17</sup>, and Procedures for Resolving Complaints of Title IX Harassment<sup>18</sup>. The Vice President for Ethics and Compliance is responsible for overseeing and coordinating the enforcement of policies and procedures that deal with harassment for all campuses and operations in the University system. The Office of Institutional Equity monitors complaints or requests for assistance on a regular basis.

The Office of Institutional Equity monitors complaints and/or inquiries. In addition, it identifies any patterns or trends that suggest areas requiring remedial action by the University. For example, a disproportionately high number of complaints from a particular college, department or unit may trigger a special investigation or targeted training by the Office of Institutional Equity. To facilitate this process, the Office of Institutional Equity developed a complaint database containing key information about complaints filed with the Office.

### **Findings:**

- University staff members have multiple avenues for pursuing complaints and grievances. The Office of Institutional Equity is the point of contact for all discrimination and harassment complaints made by the campus community.

### **Recommendations:**

- Continued efforts will be made to educate and inform the entire campus of their rights to file complaints should they experience or observe actions that potentially violate the University's Anti-Harassment or Non-Discrimination policies and to educate staff in an effort to reduce the likelihood that actions will be taken that might trigger complaints.

## M. POSTERS AND NOTICES

Required posters and notices with information on equal employment opportunity and affirmative action policies are placed in all campus buildings. The Human Resources Department and the Office of Institutional Equity conduct routine checks of employee bulletin boards and other relevant areas for required affirmative action posters and notices.

### **Findings:**

- Campus buildings contain the required posters and notices, in areas that are visible to the campus community.

### **Recommendations:**

- The Office of Institutional Equity and the Human Resources Department will continue to inspect each building on a regular basis to ensure compliance.

## N. CONTRACT AND COMPLIANCE

Purdue University Northwest seeks, identifies, and encourages female and minority owned and operated firms to participate in providing Purdue with goods and services.

### **Findings:**

- The University collaborates with regional agencies to be a useful tool in creating awareness, providing clarification, and establishing relationships with minority and female business owners.

### **Recommendations:**

- The University will work with local constituent groups to maintain an accurate list of available minority and female contractors, vendors, and suppliers.
- The Office of Procurement and Auxiliary Services should continue to develop relationships and to track progress in this area.

# **PART VI**

## **DEVELOPMENT AND EXECUTION OF PROGRAMS**

### **A. MONITORING OF POSITION SPECIFICATIONS**

#### **1. Staff**

The Employment Team within the Human Resources Department reviews all non-faculty position specifications for job-relatedness and non-discrimination on the basis of race, color, sex, disability, age, veteran status, religion, national origin, ancestry, genetic information, marital status, parental status, sexual orientation, or gender identity and expression, except where age, sex or national origin is a bona fide occupational qualification.

#### **2. Faculty**

Each academic department is responsible for monitoring its respective faculty job specifications for job-relatedness and non-discrimination on the basis of race, color, sex, disability, age, veteran status, religion, national origin, ancestry, genetic information, marital status, parental status, sexual orientation, or gender identity and expression, except where age, sex or national origin is a bona fide occupational qualification. The Office of Institutional Equity assists in this evaluation process.

### **B. DISTRIBUTION OF POSITION ANNOUNCEMENTS**

All openings posted through the Human Resources Department are available for viewing on the Human Resources Department web site. Applicants having trouble accessing information on the Human Resources Department web site because of a disability are directed to contact Human Resources at 219-989-2251. Printed copies of the vacancies are also available in the Human Resources Department. Each job opening announcement is sent to WorkOne, the NAACP, the Urban League, City of East Chicago, HigherEdJobs.com and local Veterans Services. Additionally, Management, Professional and Administrative and Operational Support vacancies may be advertised via various websites in an effort to increase diversity among the applicant pool including individuals with disabilities and veterans.

The Office of Institutional Equity monitors each faculty position announcement for an adequate search and recruitment plan. The office also checks for compliance with equal employment opportunity and affirmative action guidelines and disclaimers.



Faculty postings are available for viewing on the Human Resources Department website. Applicants having trouble accessing information on the Human Resources Department web site because of a disability are directed to contact Human Resources at 219-989-2251.

Each advertisement and search plan is also reviewed to see that it includes mechanisms likely to reach protected class members. When efforts appear inadequate, the Office of Institutional Equity immediately calls the search chair, dean, or department head to urge additional and/or alternative strategies, including networking with those colleges and universities with minority predominance.

## C. SELECTION PROCESS

### 1. Education of Selection Personnel

All employees involved in the hiring process are taught equal employment opportunity requirements in open workshops offered by the Office of Institutional Equity. This includes the "Faculty Search and Screen Procedures."

### 2. Adherence to Uniform Guidelines on Employee Selection

The Human Resources Department adheres to the Uniform Guidelines on Employee Selection in its screening and referral process. Close communication is maintained between the Human Resources Department staff handling employment and the hiring supervisors. Visits with hiring supervisors are conducted regularly by recruiters to ensure compliance with the University's policies and procedures.

## D. RECRUITMENT AND REFERRAL SOURCES

The Office of Institutional Equity will provide recruitment and referral sources by female and minority classification and academic discipline. These sources of information grow through networking and identifying appropriate organizations that advocate minority and female opportunities in employment.

In an effort to address underutilization in the EEO6 categories within the various departments, the Office of Institutional Equity will continue its efforts to assist departments with attracting more female and minority applicants when a position has opened up. Departments will be given lists of additional advertising sources that will address underutilization specific to their area.

## E. ADVERTISING

Advertisements are prepared by the respective school or department. The Office of Institutional Equity monitors all faculty advertisements for possible discriminatory language and the inclusion of the statement: "Purdue University Northwest is an EOE/AA employer fully committed to achieving a diverse workforce. All individuals, including minorities, women, individuals with disabilities, and protected veterans are encouraged to apply."

The Human Resources Department and, when requested, the Office of Institutional Equity, monitors the non-faculty advertisements for inclusion of this statement.

The phrase "an equal access/equal opportunity university" is used for advertising in publications pertaining to special events, programs, and activities.

The Office of Institutional Equity advises and assists colleges, departments or units regarding wording and tone that might have greater recruitment appeal for females and minorities.

## F. PUBLICATIONS

The Purdue Marketing Communications office ensures that University publications contain the phrase "an equal access/equal opportunity university." They also check to see that where there are pictures of students, staff, or visitors, there is a balanced representation of females, minorities, veterans, and individuals with disabilities.

## G. SOCIAL AND RECREATIONAL OPPORTUNITIES

For all University sponsored social and recreational functions, the University offers equal opportunity to all employees without regard to race, color, sex, disability, age, veteran status, religion, national origin, ancestry, genetic information, marital status, parental status, sexual orientation, or gender identity and expression.

Also, institutional facilities will continue to be provided for all employees on an equal basis. Where segregation is necessary by sex, for example locker rooms or rest rooms, facilities will be substantially equal for males and females.

## H. SPECIAL INITIATIVES BY ORGANIZATIONAL UNITS

The following is a list of some of the special initiatives colleges and departments have engaged in to promote equal opportunity for females and minorities. The list is not exhaustive, but can be considered representative. Additional initiatives specific to veterans and individuals with

disabilities are included in the Purdue University Northwest “Affirmative Action Plan for Veterans and Individuals with Disabilities.”

## Cultural Heritage Celebration Committee

The Cultural Heritage Celebration Committee was inaugurated in 2023 evolved from Creating a Culture of Inclusion Team (CCIT). This committee is charged with providing leadership for all Purdue Northwest celebrations of cultural heritage. The PNW community includes students, faculty and staff of various ethnicities, genders and backgrounds, and the Cultural Heritage Celebration Committee aims to provide educational and uplifting events to the PNW community in order to build an inclusive campus.

Its members are responsible for planning, coordinating, and executing campus celebrations that include but are certainly not limited to:

- Hispanic Heritage Month
- Black History Month
- The Martin Luther King, Jr. Holiday (MLK Day)
- Women’s History Month
- Native American History Month
- Arab American Heritage Month
- Asian American and Pacific Islander Heritage Month
- LGBTQIA+ Pride Month
- Juneteenth

## PRIDE Team: PNW Respecting Inclusion, Diversity and Equity

Another branch of a restructured CCIT also launched in 2023 as the PRIDE Committee, whose acronym stands for **P**NW **R**especting **I**nclusion, **D**iversity and **E**quity. The mission of the PRIDE Team at Purdue University Northwest is to promote an open, respectful, and welcoming climate and culture that facilitates learning, discovery, service, engagement and professional development. The PRIDE team, in its vision, strives for a PNW community that values diversity, equity, inclusion and belonging.

Through the programs and services offered by PRIDE, students, employees and the community learn cultural awareness, appreciate diverse perspectives, promote equity and belonging.

- Diversity – Diversity is the infinite range of human differences. As such, we at PNW, view diversity holistically, understanding that the definition is constantly evolving and that our plurality is our strength.
- Inclusion - Inclusion is involvement and empowerment, which the inherent worth and dignity of all people are recognized and celebrated. As an inclusive university, PNW promotes and sustains a sense of belonging; it values and practices respect for the talents, beliefs, backgrounds, and ways of living of its members.
- Equity – A central tenet of equity is the guarantee of fair treatment, access, opportunity, and advancement for all while striving to identify and eliminate barriers that have prevented the full participation of some groups. At PNW, the principle of equity

acknowledges that there are historically under-served and under-represented populations. Fairness is needed to assist equality in the provision of effective opportunities for all groups while on campus and in the broader community.

- Belonging – A desire to be accepted or included as a member or part of a group. PNW views belonging as an essential inclusivity component for students, faculty and staff. It permits the “Belonger” to feel a sense of accomplishment and success in their individual and collective endeavors.

## Office of Institutional Equity

The Office of Institutional Equity conducted Title IX and harassment and discrimination prevention training with several areas of the Purdue University Northwest campus. The training sessions included resident advisors, and community assistants in University housing, coaches and athletes, camp directors, Deans and Department Heads, and students.

Staff within the Office of Institutional Equity conducted personalized one-on-one training in specific situations as needed and made presentations to various classes and departments regarding harassment prevention. New employees and new students regularly receive training regarding the University’s Nondiscrimination and Anti-Harassment policies at their respective orientations.

The Office of Institutional Equity also administers the Mandatory Reporters training for Purdue University Northwest employees designated as such. Mandatory Reporters include individuals employed by the University who hold a title of or equivalent to President, Chancellor, vice president, vice chancellor, vice provost, dean, department head and director, as well as employees in supervisory or management roles and staff who have authority to institute corrective measures on behalf of the University.

Training for PNW members of the Chancellor’s Equity Panel members is led by Vice President Alysa Rollock and her team at the West Lafayette campus annually. The training provides equity panel members an opportunity to learn or review University policies regarding Non-Discrimination, Anti-Harassment, and Equal Opportunity, Equal Access, and Affirmative Action, as well as the Procedures for Resolving Complaints of Discrimination and Harassment.

## Building Community through the Arts (BCTA)

This program was established as a community outreach project designed to reach the diverse external communities served by Purdue University Northwest. As a regional university, it is extremely important that we be engaged with our community in a variety of ways. Artistic expression is a universal attribute of human beings. By providing innovative, comprehensive and excellent programs, BCTA facilitates growth by the University community. The initial

motivation for this program stemmed from recognizing that diverse cultures have important perspectives for all of us and it is vital to maintain that framework.

The College of Humanities, Education and Social Sciences (CHESS) sponsors BCTA. The program is directed by a committee whose members represent areas from across the campus community. BCTA events happen twice a year, typically once in the fall semester and once in the spring semester. Event location and themes vary, though typically serve to create cultural awareness, civic engagement and preserve community identity.

## One Book, One University

Purdue University Northwest has invited the community to learn and grow together through One Book, One University (previously known as “One Book, One Community”). To encourage conversations across academic disciplines and unite the campus community, the One Book, One University Committee works with campus groups and the community for additional events, such as summer-teaching workshops for interested faculty and graduate students, panel and film presentations, and student research projects.

# I. INTERNAL AND EXTERNAL DISSEMINATION

The University disseminates its Equal Opportunity, Equal Access and Affirmative Action policy both internally and externally utilizing the following procedures:

## 1. Internal Dissemination

### **Published Documents and Postings**

The policy is available on the University Policy Office Website<sup>19</sup> and the Office of Institutional Equity website.<sup>20</sup>

Equal employment opportunity posters and other required notices are displayed in locations where resumes are received, where employment interviews are routinely conducted, and on public bulletin boards in campus buildings.

### **Programs and Presentations**

The Chancellor and senior executive staff emphasize this policy in meetings with deans, directors, department heads, faculty and staff, and advisory groups.

The Executive Director of the Office of Institutional Equity meets with the Vice Chancellors, as well as, staff from the Human Resources Department periodically to discuss Affirmative Action and Equal Employment Opportunity in order to ensure that all staff are aware of their responsibilities, and to determine if Affirmative Action and Equal Employment Opportunity progress is being made.

Orientation programs for new faculty (full and part-time) and staff include an overview of Purdue policies and directions to find more information on the Office of Institutional Equity website.<sup>21</sup> Training workshops for current employees are frequently conducted by the Office of Institutional Equity during which the policy is discussed, and responsibilities and procedures are explained.

The Office of Institutional Equity provides training to faculty search committees to ensure committee members understand Affirmative Action and Equal Employment Opportunity procedures and guidelines. In addition, all requests to fill new and existing faculty positions must be reviewed and authorized by the Office of Institutional Equity prior to posting. For staff searches, Human Resources informs search committee members and hiring supervisors of their responsibilities of equal employment opportunity, equal access, and affirmative action. Once approval to create the position is authorized, the Office of Institutional Equity or Human Resources ascertains whether there is an underutilization and advises the search chair accordingly.

This Affirmative Action Plan is distributed annually to Purdue Northwest administrators.

## 2. External Dissemination

### Advertisements and Notices

Each advertisement of a vacant position placed by the University must state in clear distinguishable type: "Purdue University is an EOE/AA employer fully committed to achieving a diverse workforce. All individuals, including minorities, women, individuals with disabilities, and protected veterans are encouraged to apply."

Applicants are informed of the Affirmative Action and Equal Employment Opportunity policy through posters displayed in the proximity of the Human Resources Department, campus buildings, and in materials included in the employment application packet.

The Purchasing Department sends written notification of the Equal Opportunity, Equal Access and Affirmative Action policy, including the equal opportunity clause to all sub-contractors, vendors, and suppliers doing business with Purdue Northwest. The statement reads as follows:

**NONDISCRIMINATION:** The Seller, or its subcontractor(s), if any, shall not discriminate against any qualified employee or applicant for employment in the performance of this Agreement, with respect to hire, tenure, terms, conditions, or privileges of employment, or any matter directly or indirectly related to employment because of race, religion, color, sex, age, national origin or ancestry, disability or status as a disabled or Vietnam era veteran or any other basis prohibited by applicable law. The Seller, or its subcontractor(s), if any, agrees to comply with all the provisions contained in the Executive Orders No. 11246 and No. 11375, the Equal Employment Opportunity Clause requirements as set forth at 41 CFR 60 –1.4, 41 CFR 60- 250.22 and 41 CFR 60-741.5(a), which are hereby incorporated by reference and made a part hereof, and the nondiscrimination mandates of the Indiana Civil Rights Law as presently codified at Ind. Code § 22 – 9 – 1 – 1 et seq. As used therein the word "contractor" shall be deemed to mean "Seller," and the word "contract" shall refer to this Agreement. In addition, the seller shall cause the Equal Employment Opportunity Clauses referenced above to be included in their subcontracts or purchase orders hereunder unless exempted by rules, regulations and orders of the Secretary of Labor issued pursuant to Section 204 of the Executive Orders No. 11246 and No. 11375 as amended.

The Facilities Services Department includes the University policy and equal opportunity clause in the general conditions of all contracts to be let for bid.

### Other Methods

Print copies of the Affirmative Action Plan are available by request at the Office of Institutional Equity located in Lawshe Hall, Room 218 and in Schwarz Hall, Room 150. Copies of the plan are made available electronically and printed upon request to all senior leaders and managers of the departments, which include the Chancellor, Provost, Vice Chancellors, and College Deans.

Additionally, the library shall retain a printed copy of the plan, which is available upon request to all faculty, staff, students and community members.

Attention is given during preparation of handbooks, brochures, websites, and other publications to include information and pictures reflecting the participation of females, minorities, veterans and people with disabilities in a wide range of campus activities. The Office of Institutional Advancement, through the Marketing and Communication team, shares this responsibility.

Purdue University Northwest's Equal Opportunity, Equal Access and Affirmative Action policy and its Affirmative Action Plans can also be found on the Office of Institutional Equity website.<sup>22</sup>



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<sup>1</sup> <https://www.pnw.edu/office-institutional-equity/affirmative-action-plan/>

<sup>2</sup> [https://www.purdue.edu/purdue/ea\\_eou\\_statement.php](https://www.purdue.edu/purdue/ea_eou_statement.php)

<sup>3</sup> <https://www.purdue.edu/policies/ethics/iic2.html>

<sup>4</sup> <https://www.pnw.edu/oie>

<sup>5</sup> Individuals appointed as visiting faculty, post-doctoral research associates, or other non-tenure track positions labeled EEO-6 category 03, are included as part of the workforce summaries, but placement goals are not established for this group. By definition, the positions are of a limited duration.

<sup>6</sup> Graduate student assistants, designated as EEO-6 category 04, are included in certain workforce reports primarily to account for all staff listed on the University payroll. However, placement goals are not set for job groups in the student assistant category because student appointments are limited duration appointments related solely to academic programs and are not part of the normal hiring procedures.

<sup>7</sup> Any job groups designated by the University as “temporary” are not included in any of the workforce summaries, comparisons, or utilizations set forth in this plan.

<sup>8</sup> [https://www.purdue.edu/ethics/Affirmative\\_Action/POCCodesbyEEO.pdf](https://www.purdue.edu/ethics/Affirmative_Action/POCCodesbyEEO.pdf)

<sup>9</sup> <http://www.purdue.edu/policies/ethics/iic2.html>

<sup>10</sup> The October Snapshot File is prepared annually and contains comprehensive data on the composition of the PNW Westville workforce.

<sup>11</sup> <http://www.purdue.edu/policies/academic-research-affairs/ib1.html>

<sup>12</sup> <http://www.purdue.edu/policies/human-resources/vid1.html>

<sup>13</sup> <http://www.purdue.edu/policies/ethics/iic2.html>

<sup>14</sup> <https://www.purdue.edu/ethics/resources/resolving-complaints.php>

<sup>15</sup> <http://www.purdue.edu/policies/ethics/iic1.html>

<sup>16</sup> <https://www.purdue.edu/ethics/resources/resolving-complaints.php>

<sup>17</sup> <https://www.purdue.edu/policies/ethics/iic4.html>

<sup>18</sup> <https://www.purdue.edu/ethics/resources/titleIX-complaints.php>

<sup>19</sup> <https://www.purdue.edu/policies/>

<sup>20</sup> <https://www.pnw.edu/oie>

<sup>21</sup> <https://www.pnw.edu/oie>

<sup>22</sup> <https://www.pnw.edu/oie>

# Office of Institutional Equity

[pnw.edu/oie](http://pnw.edu/oie)



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All individuals, including minorities, women, individuals with disabilities, and  
veterans are encouraged to apply.**