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Preface

Oklahoma State University (also referred to as the University) is fully committed to the concept and practice of equal opportunity and affirmative action in all aspects of employment.

In the preparation of this AAP, the University has used the terminology used in E.O. 11246 and its implementing regulations as a guide. Therefore, the use of such terms as "underutilization," "deficiency," "concentration," "affected class," "goal," "problem area," etc. should not be construed as an admission by the University, in whole or in part, that any problem area exists or that either minorities or women have been or are presently being underutilized, concentrated, or discriminated against in any way by the University in violation of federal, state, or local fair employment practice laws. Furthermore, nothing contained in this AAP or its supporting data should be construed as an admission by the University, in whole or in part, that it has contravened such federal, state, or local employment practice laws.

In developing and implementing the AAP, the University has been guided by its established policy of providing equal employment opportunity. Any placement goals that the University has established herein are not intended as rigid, inflexible quotas that must be met, but rather as targets reasonably attainable by applying every good faith effort in implementing this AAP. The use of placement goals in this AAP is not intended, nor is the effect of such placement goals intended, to discriminate against an individual or group of individuals with respect to any employment opportunities for which he, she, or they are qualified on the grounds that he, she, or they are not the beneficiaries of affirmative action themselves. Nothing herein is intended to sanction the discriminatory treatment of any person. Indeed, all employment decisions at the University are made based on job-related criteria. Thus, this AAP has been developed in strict reliance upon the Guidelines on Affirmative Action issued by the Equal Employment Opportunity Commission (EEOC) (29 C.F.R. Part 1608).

While Oklahoma State University firmly believes in wide dissemination of its affirmative action policies and equal employment opportunity practices, this AAP contains certain proprietary information relating to University's business that must be kept confidential. The detailed information provided in good faith as a part of the AAP contains specific information that, if disseminated, could be detrimental to the competitive and business interests of this company. At a minimum, the complexity of this data is subject to misinterpretation and misuse, which again can be very harmful to business goals and objectives solely unrelated to the affirmative action and equal employment opportunity concept.

Therefore, even though the University is justifiably proud of the progress and placement goals that are described in the following pages, this AAP and its support data are to be disclosed only to individuals, companies and government agencies only where such individuals or entities have a legitimate business interest or legal entitlement to the information. Oklahoma State University specifically requests the following:

1. If this information is submitted to the Office of Federal Contract Compliance Programs (OFCCP) pursuant to the relevant Executive Order and regulations, it is to be considered confidential and not subject to disclosure without notifying Oklahoma State University of the agency's decision to disclose and providing the University with ample time to contest the disclosure.
2. If this information is supplied to another government contractor, EEOC representative, or any other person who is given access to the AAP, it is not to be copied, reproduced, or disclosed without prior notification to Oklahoma State University.
3. No information contained in the AAP is to be copied, removed from the premises, or released to other individuals without prior notification to Oklahoma State University.
4. All monitoring system reports as required by federal regulations and laws have been completed. Reports that require specific data such as names of employees and salary information are not an official part of this AAP. This information is on file at the University as Documentation and Supporting Data for AAP

Reports and is available for review only as required by law.

The material set forth in this AAP is deemed to include personnel files, investigatory records, trade secrets, confidential operations information, confidential statistical data and other confidential commercial and financial data, within the meaning of the Freedom of Information Act (5 U.S.C. Section 552), Title VII of the Civil Rights Act of 1964 (as amended) (42 U.S.C. Sections 2000e et seq.), and the Trade Secrets Act (18 U.S.C. Section 1905, and 44 U.S.C. Section 3508), the disclosure of which is prohibited by law and would subject the individual making the disclosure to criminal and/or civil sanctions.

This AAP does not constitute an express or implied contract between the University and its employees, job applicants, or other persons. Nothing in this AAP provides any individual or group with a private right of action against Oklahoma State University.

Introduction

Ever committed to affirmative action, Oklahoma State University has prepared this AAP to cover employees reporting to and/or working in Stillwater. This plan also covers employees working in other establishments who report to managers included in this plan.

As detailed in the Job Group Analysis, this AAP covers 0 employees. It is expected that these employees will help us to reach mutual goals of profitability and efficiency, resulting in both business and personal growth. As described in detail in the Plan that follows, the management of Oklahoma State University has a continuing commitment to the practice and implemented action of this AAP.

Responsibility for Implementation

41 C.F.R. 60-2.17

Dr. Jason Kirksey, Associate Vice President for Institutional Diversity, has overall responsibility for implementation of the Equal Employment Opportunity Policy and the AAP. The University has assigned primary management responsibility and accountability for ensuring full compliance with the plan to , an official of the University. The Director of Human Resources has the authority, resources, support of and access to top management necessary to ensure the effective implementation of the AAP. The Associate Vice President for Institutional Diversity actively supports the program and provides assistance whenever it is needed, making managers and supervisors aware of the program and requesting their cooperation and assistance. The name of the Director of Human Resources appears on internal and external communications on the University's Equal Employment Opportunity Policy and AAP.

1. The duties of the Director of Human Resources include:
 - A. Developing policy statements, AAP methods, and internal and external communication techniques. Affirmative action policies and procedures will continue to be developed to ensure an efficient yet positive interaction between the Director of Human Resources and the managers charged with employment responsibility.
 - B. Assisting in the identification of problem areas, and developing strategies to eliminate any problems identified.
 - C. Assisting line management and supervisors in devising solutions to equal employment problems, including counseling and training, to ensure full understanding of affirmative action and EEO policies and procedures.
 - D. Designing and implementing monitoring and reporting methods that will:
 - Measure the effectiveness of the University's equal employment and AAP.
 - Indicate any need for remedial action.
 - Determine the degree to which the University's placement goals and objectives are being attained.
 - Provide management with a working understanding of the University's AAP placement goals and objectives.
 - E. Meeting with managers, supervisors, and employees to assure that the company's EEO policies are being followed.
 - F. Ensuring that supervisors understand that their work performance is being evaluated in part on the basis of their demonstrated commitment to equal employment opportunity, and that it is their responsibility to prevent all types of unlawful workplace harassment.
 - G. Serving as a liaison between the University and enforcement agencies.
 - H. Serving as a liaison between the University and appropriate minority and women's organizations, and community action groups concerned with employment opportunities of minorities and women.
 - I. Making contact with predominately female and minority high schools, colleges, and technical schools in the area as needed.
 - J. Keeping management informed of developments in the equal employment opportunity and affirmative action area.

- K. Conducting a periodic audit to ensure that the University complies in the following ways:
 - i. EEO posters are properly displayed.
 - ii. All employees are afforded the opportunity and are encouraged to participate in all University-sponsored educational, training, recreation, and social activities.
- 2. The University recognizes that the cooperation of department supervisors and line managers is required to reach the full potential of this AAP. Therefore, supervisors and managers are expected to:
 - A. Assist the Director of Human Resources in the identification of any problem areas and help to eliminate any barriers to equal employment opportunity.
 - B. Whenever possible, become involved in local minority organizations, women's organizations, community action groups, and community service programs.
 - C. Work with the Director of Human Resources to periodically review hiring and promotion patterns and training programs to isolate impediments to the attainment of affirmative action placement goals and objectives. Results from these reviews are communicated through appropriate management meetings.
 - D. Review the qualifications of employees to ensure that minorities and women are given full opportunity for transfers and promotions.
 - E. Provide career counseling for employees as needed.
 - F. Adhere to the University's policy of equal employment opportunity for all employees and ensure that the policy is understood, supported and adhered to by the employees they supervise.
 - G. Take action to prevent the harassment of employees based on protected characteristics or due to a perception that an individual might have been the beneficiary of the University's affirmative action efforts.

Organizational Profile

41 C.F.R. 60-2.11

As one of the diagnostic components of Oklahoma State University's AAP and to conform to applicable regulations, the University has completed a profile of the workforce at the Stillwater establishment. The organizational profile is an overview of the staffing patterns at this establishment and is used to determine whether there are areas in the workforce where minorities or women are underrepresented or concentrated. To complete our organizational profile we have elected to follow the Workforce Analysis methodology.

The following charts set forth our Workforce Analysis. The analysis identifies the departments at the Stillwater establishment and for each department lists all job titles from the lowest paid to the highest paid. For each job title, we provide the following data: the total number of incumbents, the total number of male and female incumbents, and the total number of male and female incumbents by racial/ethnic group.

Job Group Analysis

41 C.F.R. 60-2.12

As the second diagnostic component of our AAP we have conducted a job group analysis. The job group analysis is the first step in comparing the representation of minorities and women in the workforce covered by this AAP with the estimate of the available qualified minorities and women who could be employed by Oklahoma State University in positions covered by this AAP.

In designing our job groups we considered the following elements:

- Similarity of duties and responsibilities;
- Similarity of compensation, and
- Similarity of opportunities for advancement including training, transfers, promotions, mobility and other career enhancements.

Although not a determinative factor in designing job groups, we also attempted to create job groups that are large enough to conduct appropriate analysis.

The following charts identify the job groups created for this AAP, the job titles that comprise each job group, and the percentage of minority incumbents and the percentage of female incumbents in each job group.

Availability Analysis

41 C.F.R. 60-2.14

The availability analysis is a part of the Incumbency vs. Estimated Availability Analysis - the final diagnostic component of this AAP. The purpose of the availability analysis is to establish a benchmark against which the demographic composition of University's workforce may be compared to determine whether barriers to equal employment opportunity may exist within particular job groups.

Pursuant to applicable regulations, the availability analysis for each job group examines two potential areas of availability: individuals with the requisite skills outside the establishment (external availability) and those within the establishment who are promotable, transferable and/or trainable (internal availability). In determining availability, we have selected our reasonable recruitment area and our pool of promotable, transferable, and trainable employees in such a way as not to exclude qualified minorities and women. Moreover, when determining external availability we have used as our source of data the most current and discrete statistical information available. For this availability analysis, we have used the 2000 census data. Finally, where a job group is composed of different job titles that carry different availability rates, we calculated a composite availability figure. We arrived at the composite availability figure by determining the proportion of the job group incumbents employed in each job title, weighting the availability for each job title by the proportion of incumbents employed in that title, and adding together the weighted availability estimates.

A brief written rationale for the selection of the recruitment areas and internal pools by job group follows:

Comparison of Incumbency vs Estimated Availability

41 C.F.R. 60-2.15

Oklahoma State University has compared the representation of minorities and women in each job group with their representation among those identified in the availability analysis as available for employment in the job group. Where actual representation was less than the calculated availability, the University conducted a statistical test to determine whether the difference was greater than could reasonably be expected. Where the job group was of a sufficient size to analyze using the two standard deviation test, the University applied that methodology. Where the use of the two standard deviation test was not appropriate, the University used the exact binomial methodology. The comparison of availability with actual representation follows:

Placement Goals

41 C.F.R. 60-2.16

As required by applicable regulations, Oklahoma State University has established placement goals where the actual representation of women or minorities in a job group is less than would be reasonably expected based on calculated availability.

In establishing placement goals, we applied the following principles:

1. When the percentage of minorities or women employed in a particular job group is less than would reasonably be expected given their availability percentage in that job group, the University established a percentage annual placement goal at least equal to the availability figure derived for women or minorities, as appropriate, for that job group.
2. Placement goals are not quotas that must be met, nor are they to be considered as either a ceiling or a floor for the employment of particular groups.
3. In all employment decisions, the University makes selections in a nondiscriminatory manner. Placement goals do not provide a justification to extend a preference to any individual, select an individual, or adversely affect an individual's employment status, on the basis of that individual's race, color, religion, sex, age, disability, veteran status, or national origin.
4. Placement goals do not create set-asides for specific groups, nor are they intended to achieve proportional representation or equal results
5. Placement goals are not used to supersede merit selection principles, nor do these placement goals require the University to hire a person who lacks qualifications to perform the job successfully or hire a less-qualified person in preference to a more-qualified one.
6. The placement goals established in this AAP may reflect the University's publicly announced permissible preference for American Indians living on or near an Indian reservation.

As is described in more detail in the Action Oriented Program section of this AAP, where a placement goal is set, the University will develop action oriented steps to increase the recruitment and training of minorities or women, or both.

Placement Goals

There are currently no placement goals for this plan.

Identification of Problem Areas by Organizational Unit and Job Group

41 C.F.R. 60-2.17(b)

We have conducted in-depth analyses of our total employment process, including the workforce by organizational unit and job group, personnel activity, compensation, and other personnel procedures to determine whether and where impediments to equal employment opportunity exist.

An analysis of each of these processes follows.

1. Composition of the Workforce by Organizational Unit

Our analysis by organizational unit reveals that minorities and women are not significantly underrepresented or concentrated in any particular organizational unit. This analysis suggests that there is no policy or practice excluding minorities or women from any departments, nor is there any racial or sexual discrimination in the selection process.

2. Composition of the Workforce by Job Group

Pursuant to the Office of Federal Contract Compliance Programs' (OFCCP) regulations, we have conducted an availability analysis by job group, taking into account both external and internal availability, and have compared incumbency to estimated availability to determine placement goals. The descriptions of Factor 1 and Factor 2 by job group are summarized in the Availability Analysis. Our findings are as follows:

- A. Our analysis of incumbency vs. estimated availability indicates that in some cases, incumbency is less than estimated availability, however, our more detailed analysis concludes that there is no significant problem concerning minority utilization.
- B. Our analysis of incumbency vs. estimated availability indicates that in some cases, incumbency is less than estimated availability, however, our more detailed analysis concludes that there is no significant problem concerning female utilization.
- C. The University has established affirmative action placement goals and programs to address underutilization, and will continue to make a good faith effort to reach the placement goals established and implement action-oriented programs, which are detailed elsewhere in this AAP.

3. Analysis of Progress Towards Prior Year Goals

In establishing placement goals, the following principles apply:

- A. When the percentage of minorities or women employed in a particular job group is less than would reasonably be expected given their availability percentage in that job group, the University has established an annual percentage placement goal at least equal to the availability figure derived for women or minorities, as appropriate, for that job group.
- B. Placement goals are not quotas that must be met, nor are they to be considered as either a ceiling or a floor for the employment of particular groups.
- C. In all employment decisions, the University makes selections in a nondiscriminatory manner. Placement goals do not provide a justification to extend a preference to any individual, select an individual, or adversely affect an individual's employment status, on the basis of that individual's race, color, religion, sex, age, disability, veteran status, or national origin.
- D. Placement goals do not create set-asides for specific groups, nor are they intended to achieve proportional representation or equal results.

- E. Placement goals are not used to supersede merit selection principles, nor do these placement goals require the University to hire a person who lacks qualifications to perform the job successfully or hire a less-qualified person in preference to a more-qualified one.

A review of progress and goal attainment for the period from November 01, 2011 to October 31, 2012 reveals that there are no prior year goals for minorities and women.

4. Personnel Activity

The University has analyzed additional personnel activities to determine whether and where impediments to equal employment opportunity exist and whether there are significant selection disparities by race/ethnicity or gender. These activities include applicant flow, hires, promotions, terminations, and other personnel actions.

A. Applicant Flow

During the plan year, November 01, 2011 to October 31, 2012, the University posted the majority of all open positions with the State Employment Service. The Human Resources Department accepted applications for open positions, and all persons interested in obtaining employment with the University were advised to apply according to our current policy. Applications and complete records have been kept to ensure goals of equal employment opportunity are being applied to this process.

B. Hires

The Human Resources Department develops all procedures and all hiring at the University is conducted on the basis of nondiscriminatory criteria. Specifically, the following criteria and procedures have resulted in hiring decisions that are free of discrimination:

- i. Job descriptions have been reviewed and revised to ensure that duties are accurately described, that the experience and education requirements are strictly job-related, and that all incumbents meet minimum job requirements. Job titles have and will continue to be written without regard to race, color, religion, sex, age, disability, veteran status, national origin, or any other characteristic protected by applicable law.
- ii. Application forms have been reviewed to ensure that all requested information is job-related, and that the forms comply with all applicable laws. In addition, all forms state that the University is an Equal Opportunity/Affirmative Action Employer.
- iii. A company representative who is briefed in the law with regard to Equal Employment Opportunity/Affirmative Action conducts interviews.
- iv. Tests have been reviewed and are administered and conducted in a non-discriminatory manner.
- v. All employees are encouraged to refer qualified applicants to the University for employment. In addition, the University has formal recruitment procedures to apprise minority and women's groups, educational institutions, and other referral sources of openings.
- vi. Placing an applicant in a specific job in a department is the responsibility of management. Hiring decisions are based on the applicant's knowledge, skills, abilities, and any other job-related criteria.

C. Promotion Practices

A review of promotion data indicates that these practices represent an area of substantial

employment opportunity for minority and female employees. Promotion practices are not problem areas for minorities and women in any job group. Our analysis reveals that neither minorities nor women are being treated disparately in promotions because:

- i. The University provides every reasonable opportunity for employees to advance. In this regard, training and other developmental opportunities are offered.
- ii. Employees are encouraged to contact their supervisor and/or the Human Resources Department, at any time, should they desire information relative to another position within the University.
- iii. Management-initiated promotions are based on performance and other job-related criteria without discrimination on account of race, color, religion, sex, age, disability, veteran status, national origin, or any other characteristic protected by applicable law.
- iv. Most promotional opportunities are posted, providing all interested employees with an opportunity to apply and call their special skills to the attention of the manager.
- v. Our program of career development enables all employees to designate career paths and positions for which they wish to be considered.

D. Compensation Systems

As part of its affirmative action obligations, the University has conducted a compensation analysis to determine whether there are pay disparities on the basis of gender, race, or ethnicity. According to our analysis, we have not identified any significant problem areas. If the University discovers significant salary differences between men and women or non-minorities and minorities, it will determine whether they are the result of legitimate, nondiscriminatory factors such as tenure, time in job, time in grade, performance, education, previous experience, etc. Where appropriate, the University will take all reasonable and immediate steps to make any necessary adjustments.

E. Terminations

The University has evaluated its termination practices to determine whether there are disparities on the basis of gender, race or ethnicity. When terminations or reductions in force are necessary, the University makes its decisions without regard to race, color, religion, sex, age, disability, veteran status, national origin, or any other characteristic protected by applicable law.

5. Technical Phases of Compliance

Our analysis of the technical phases of compliance reveals that the University fully complies with all the technical phases of its affirmative action obligations:

- A. Equal Employment Opportunity posters are prominently displayed in each University location.
- B. The University notifies all contractors and subcontractors via purchase orders and subcontracts that they may be subject to federal affirmative action obligations.
- C. The University requires that all of their qualified contractors and subcontractors develop and maintain a written AAP.
- D. The University's employment application has a statement concerning Equal Employment Opportunity.
- E. All recruitment agencies and area schools and colleges will continue to be notified of the University's commitment to the goals of affirmative action.

- F. All recruitment advertising includes the solicitation "An Equal Opportunity Employer" or its abbreviation.
- G. All other required affirmative action notices and policy statements are posted on University bulletin boards and are updated annually.
- H. All personnel and employment records made or kept by the University are retained for the required period as mandated by OFCCP regulations.
- I. The University files annual EEO-1 and VETS-100A reports with the appropriate agencies.

Development and Implementation of Action Oriented Programs

41 C.F.R. 60-2.17

The University has developed and executed action-oriented programs designed to correct any problem areas that may exist. These programs, which are listed below, demonstrate our good faith efforts to remove identified barriers, expand employment opportunities, and produce measurable results.

1. The University has analyzed and will continue to analyze all positions and prepare written descriptions to accurately reflect position functions. Due to the use of a position description format, they are and will continue to be consistent for the same position from one organizational unit to another.
2. Job descriptions have been and will continue to be reviewed to determine the knowledge, skills, abilities, and other requirements necessary for the adequate performance of every job. Specifications will continue to be consistent for the same job title in all organizational units and will not contain any requirements that would result in discrimination on the basis of race, color, religion, sex, age, disability, veteran status, national origin, or other characteristic protected by law.
3. Job descriptions are available to incumbents and all members of management involved in the recruiting, screening, selection, and promotion process. Job descriptions are also made available to employees, applicants, and recruiting sources as appropriate.
4. The University has carefully evaluated the total selection process and found it to be free from discrimination.
 - A. We have instructed all supervisory personnel to ensure elimination of discrimination in all personnel actions in which they are involved.
 - B. The tests administered by the University are job-related and given to all applicants for applicable position.
 - C. Application forms do not contain questions with potential discriminatory effects.
 - D. The University does not and will not use any selection techniques that can be improperly used to discriminate against minority groups or women.
5. The University has evaluated its techniques for improving recruitment and increasing the flow of qualified minority or female applicants through the following:
 - A. Minority and women, as well as non-minority and male, employees are actively encouraged to refer applicants to our organization.
 - B. The University relies on the State Department of Employment as well as job fairs and recruiting programs sponsored by local community colleges and other community organizations.
 - C. The University provides an orientation program to inform new employees of their equal employment responsibilities, promotional opportunities, University rules, ways to alleviate any problems that might arise, and any other issues related to affirmative action compliance.
 - D. Local organizations will continue to be contacted for referrals of potential minority and female employees.
 - E. The University utilizes the Internet to identify targeted recruitment sites for qualified minority and female applicants.
 - F. Furthermore, we plan to take the following additional steps to ensure adequate representation of all minorities and women:

i. Where placement goals exist as defined by the OFCCP, we will continue to contact universities and two- and four-year local colleges, vocational technical schools, high schools, local business schools, and state and community organizations which attract qualified minority and female students. We will advise these institutions of our desire to fill job openings in these classifications with minority and female employees. When possible, we will continue to participate in job fair and career day activities and we will consider relevant work experience programs.

ii.

G. We will continue to contact our normal sources of recruitment (e.g., State Employment) and advise them that under the AAP we are specifically seeking to employ minorities and/or women for job openings. During the period from November 01, 2011 to October 31, 2012, targeted recruitment activities were conducted at the following sources:

2/23/2012 - Lawton - Red River Career Expo
5/14/2012 - Oklahoma City - Deployment to Employment
6/19/2012 - Norman - Hiring Heroes
7/17/2012 - Pryor - (Tulsa area)
8/04/2012 - Old Crossroads Mall, OKC - OK Hispanic Chamber
8/14/2012 - OSU-IT, Okmulgee - OSU
8/24/2012 - Warr Acres - Hiring Our Heroes
9/11/2012 - Fort Sill, Lawton - Army Career & Alumni Program
9/19/2012 - McAlester - Hiring Our Heroes

6. The University has implemented the following programs and procedures to ensure that minority and female employees are given equal opportunities for promotion:

- A. On-the-job training is provided to all qualified employees to assist them in developing the necessary knowledge and skills for promotion to higher-level jobs. In addition, a tuition reimbursement benefit is also available to all qualified employees.
- B. The University utilizes a formal performance evaluation program for all employees. In addition, management and supervisors are trained on the basic methodology of performance evaluation.
- C. Neither minority nor female employees are required to possess higher qualifications than those of the lowest qualified incumbent in the job for which they apply.
- D. Seniority practices are not a problem since the University has no formal seniority system. Promotions are based on merit selection principles.
- E. We will continue to make opportunities for advancement into more stimulating positions widely known through our career development process and by encouraging minorities and women to take advantage of these opportunities.
- F. Special internal training programs are provided as necessary to ensure the achievement of our placement goals. The following programs are offered to eligible employees without regard to race, color, religion, sex, age, disability, veteran status, national origin or any other characteristic protected by applicable law:

G. We will continue to participate in targeted external training programs.

Internal Audit and Reporting System

41 C.F.R. 60-2.17

The University has developed and implemented an auditing system that periodically measures the effectiveness of its total AAP. The University views the activities that are listed below as critical to the success of the AAP.

1. The Director of Human Resources will continue to monitor records of applicant flow, referrals, placements, rejected offers, training, transfers, promotions, terminations, and any layoffs or recalls to ensure that the University's non-discriminatory policy is carried out. Procedures are reviewed and revised as problems are identified.
2. Top management is and will continue to be informed of any problems that arise in their respective areas so that immediate and appropriate steps can be taken to resolve any issues.
3. The University recognizes its responsibility to affirmative action and is committed to fulfilling this responsibility by complying with all government regulations and laws pertaining to equal employment opportunity. As part of this commitment, management will be kept abreast of developments in the affirmative action area. The primary vehicle for communication with management will be periodic affirmative action briefings.
4. The Director of Human Resources will generate internal reports on a regular basis to evaluate the degree to which equal employment opportunity and organizational objectives are being obtained.
5. The University will review report results with all levels of management as to the degree to which their affirmative action goals and compliance are being attained, and will design and implement corrective actions, including adjustments in programs, as needed.
6. Progress on the University's AAP will be discussed at supervisors meetings, and relevant information will be communicated to employees during regular departmental meetings as appropriate.
7. The Director of Human Resources will periodically report to the Associate Vice President for Institutional Diversity of the University and other appropriate top management on the effectiveness of the program and will submit recommendations for improvement.

Conclusion

The AAP Year, November 1, 2012 through October 30, 2013, shows a continued commitment to equal employment opportunity and affirmative action, and has strong plans to ensure both corporate and employee success.

Through its Director of Human Resources, , the University will continue to communicate its policies, both within the organization and to the community in which we work. The Associate Vice President for Institutional Diversity affords the Director of Human Resources full authority to take action to implement the plan and to pursue solutions to problems that might impede the progress of this plan.

At the close of Oklahoma State University's most recent Plan year, an analysis of the composition of the workforce was undertaken. The workforce was analyzed by job group and by department to determine the employment of minorities and women, and to identify if placement goals are indicated when compared to the appropriate available workforce. This analysis revealed no areas in which the difference between incumbency versus estimated availability was statistically significant, showing that for the overwhelming majority of the workforce, employment levels of women and minorities are representative of our recruiting population. Nonetheless, the University expects to continue its successful outreach efforts and to ensure that all applicants and employees are treated fairly, based on job-related criteria and without regard to race, color, religion, sex, age, disability, veteran status, national origin, or any other characteristic protected by applicable law.

The University is mindful of the fact that continued achievements in the area of equal employment opportunity and affirmative action are important. As a result, we have included additional action-oriented plans and programs for recruiting, communication, and reporting, to ensure that our compliance with affirmative action continues in good stead.

Finally, it should be noted that the University's thorough analysis of its workforce reveals that Oklahoma State University is in full compliance with sex discrimination guidelines and that there is no evidence of discrimination in any form against female employees. As outlined in this AAP, Oklahoma State University is ready and willing to make affirmative action both a commitment and a continued reality.

List of Exhibits

Exhibit A - Policy of Affirmative Action Letter

Exhibit A

Policy of Affirmative Action Letter

Dear Outreach and Placement Professional:

This letter is to inform you that Oklahoma State University is committed to the principles of equal employment opportunity. Moreover, as a government contractor bound by Executive Order 11246, Oklahoma State University takes its affirmative action obligations very seriously. Oklahoma State University states as its Policy of Affirmative Action the following:

1. It will be the policy of Oklahoma State University to recruit, hire, train, and promote persons in all job titles without regard to race, color, religion, sex, age, disability, veteran status, national origin, or any other characteristic protected by applicable law.
2. All employment decisions shall be consistent with the principle of equal employment opportunity, and only job-related qualifications will be required.
3. All personnel actions, such as compensation, benefits, transfers, tuition assistance, social and recreational programs, etc. will be administered without regard to race, color, religion, sex, age, disability, veteran status, national origin, or any other characteristic protected by applicable law.

To assure compliance with the University's AAP, , Director of Human Resources, has been designated to administer and monitor the Plan and make reports to Senior Management. Members of our Human Resources Department will contact you when positions are available. We request that you refer to us all qualified candidates, including women and individuals of color.

Exhibit B: EAP

EAP (Employee Assistance Program)

An Employee Assistance Program (EAP) is a confidential resource for employees, provided free of charge. EAP represents a commitment by the University to improve the well-being of employees through professional programs which can provide counseling assistance in addressing personal difficulties. For OSU-Oklahoma City employees, counseling services are available with either of the two resources listed below:

Variety Care-Community Health Centers

Located in several locations throughout the metro area.

To make an appointment call 632-6688, Ext 280 or Ext 276

Assessment and counseling services are available to employees of OSU-Oklahoma City and their immediate family (spouses and unmarried children from birth to age 19-or up to 25 if the child is a full-time student, unmarried, and dependent upon employee for principle support).

Individuals will generally be seen by Variety Care within seven (7) business days of initial contact. In emergency situations, Variety Care staff will see individuals as soon as possible. If immediate care is not possible, consultation and referral services will be provided by Variety Care. Variety Care shall use its expertise and knowledge of community resources in referring employees of OSU-Oklahoma City or members of their immediate family only to treatment facilities approved by an appropriate outside accrediting body, which are suitable to the nature and severity of the client's problems. Such individuals must be referred to three (3) treatment resources, whenever possible.

The goal of intake and assessment session(s) will be to assist the client(s) in determining the nature of their problem(s), provide assistance through counseling or direction to the most appropriate resource available to help them resolve the issue(s). Variety Care EAP staff will meet with employees or members of their immediate family up to four (4) sessions each. If more extended assistance appears to be required, referral services will be provided by Variety Care. Intake, assessment and counseling appointments will generally be scheduled in either 30 or 45 minute sessions. Variety Care will develop an appropriate treatment plan for all types of personal and family problems, including alcohol and drug abuse assessments for individuals it sees pursuant to this Agreement.

All staff members providing counseling services pursuant to this Agreement by Variety Care shall possess a license from the State of Oklahoma and a Master's degree or Ph.D. from an accredited mental health degree program in Social Work, Marriage & Family Therapy, Counseling or Psychology.

OSU-Stillwater

Located in the Seretean Wellness Center (Room 103C)

To make an appointment call 744-6415

EAP services are provided by a licensed psychologist to OSU employees and dependents.

Services that are provided through this program:

- Individual/Couples/Family Counseling
- Assessment/Evaluation
- Referral to Community Resources or Treatment
- Follow-up on Referrals

- Education and Training

Problems can be addressed through EAP:

- Alcohol/Drug Abuse
- Emotional/Stress
- Psychological
- Marital/Family
- Medical

Hours of Operation are Monday-Friday 8:00 am-5:00 pm. The EAP also attempts to accommodate people who cannot visit during regular office hours.

Exhibit C: Gender Discrimination/Sexual Harassment Policy & Title IX Grievance Procedure

1.01 GENERAL STATEMENT OF POLICY

It is the policy of Oklahoma State University (OSU) that unlawful gender discrimination in any form, including sexual harassment of faculty and staff, or other forms of gender discrimination as referenced by Title VII of the Civil Rights Act of 1964, 42 U.S.C. §2000e (Title VII), and Title IX of the Education Amendments of 1972, 20 U.S.C. §1681 (Title IX), is prohibited in the workplace and in the recruitment, appointment, and advancement of employees. Gender discrimination of students, including sexual harassment, as referenced by Title IX, is prohibited in and out of the classroom and in the evaluation of students' academic or work performance. This policy is in keeping with the spirit and intent of various federal guidelines which address the issue of fair employment practices, ethical standards and enforcement procedures.

The University encourages victims to report instances of gender discrimination prohibited by Title IX or Title VII, including but not limited to, sexual assault or other sex offenses, either forcible or nonforcible in nature. In addition to internal grievance procedures, victims of criminal gender discrimination (e.g., sexual assault or harassment) are encouraged to file complaints or reports with the Office of Safety and Security or local law enforcement agencies as soon as possible after the offense occurs in order to preserve evidence necessary to the proof of criminal offenses. The Office of Safety and Security is available to assist victims in filing reports with other law enforcement agencies.

All students, members of the faculty, and non-faculty staff personnel are required to comply with the policy and procedures outlined to address complaints about gender discrimination, sexual harassment and sexual assault. In addition to the procedures outlined in this policy statement, discrimination and harassment complaints may be filed with the U.S. Equal Employment Opportunity Commission (involving employment) or U.S. Department of Education, Office for Civil Rights (involving education programs or activities). Any complaint of gender discrimination or sexual harassment filed under the University's policy shall be processed even if the complainant also files a complaint or suit with an outside agency, U.S. Equal Employment Opportunity Commission, or U.S. Department of Education, Office for Civil Rights. Retaliation against anyone who makes a complaint or participates in the complaint process will not be tolerated.

The University is committed to providing an environment of study and work free from gender discrimination and sexual harassment as prohibited by Title VII and Title IX, and to insuring the accessibility of appropriate grievance procedures for addressing all complaints regarding gender discrimination and sexual harassment, including sexual assault. The University reserves the authority to independently deal with gender discrimination, sexual harassment, and sexual assault issues whenever becoming aware of their existence, regardless of whether informal or formal complaints have been lodged by persons complaining of such issues.

Members of the University community holding positions of authority involving the legitimate exercise of power over others have a particular responsibility to be sensitive to that power relationship. Supervisors, in their relationships with subordinates, and faculty, in their relationships with students, need to be aware of potential conflicts of interest and the possible compromise of their evaluative capacity. Because there is an inherent power difference in these relationships, the potential exists for the less powerful persons to

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perceive a coercive element in suggestions regarding activities outside those appropriate to the professional relationship. It is the responsibility of faculty and staff to behave in such a manner that their words or actions are not sexually coercive, abusive, or exploitative.

Sexual harassment also can involve relationships among equals such as when repeated advances,

demeaning verbal behavior, or offensive physical contact interfere with an individual's ability to work and study productively. The creation or condonation of hostile working or educational environments will not be tolerated and students and employees at all levels are subject to potential disciplinary action if engaged in such actions.

The University will (1) respond to every complaint of gender discrimination, sexual harassment, or sexual assault reported, (2) take action to provide remedies when gender discrimination, sexual harassment, or sexual assault is discovered, (3) impose appropriate sanctions on offenders in a case-by-case manner, and (4) protect the privacy of all those involved to the extent it is possible. The above actions will apply to the extent permitted by law or where personal safety is not an issue.

1.02 INFORMATION AND ASSISTANCE

Any individual who believes he/she may have experienced gender discrimination, including sexual harassment, or who believes that he/she has observed such actions taking place, may receive information and assistance regarding the University's policies and responsive processes from any of the following offices:

1. Director of Human Resources (Affirmative Action)/Title IX Coordinator

Administration Building, Second Floor, Human Resource Office(405)945-3297

2. Vice President for Finance and Operations

Administration Building, Second Floor, Room 201B(405)945-8631

3. Vice President for Student Services/Student Conduct Officer

Student Center Building, First Floor(405)945-3204

4. Vice President for Academic Affairs

Admin Building, Second Floor,, Room 200(405)945-3376

If an apparent conflict of interest prevents use of the assistance of the above offices, the person complaining of gender discrimination, sexual harassment, or sexual assault may request assistance directly from the Office of the President, Administration Building, Second Floor, (405)945-3230).

1.03 GENDER DISCRIMINATION AND SEXUAL HARASSMENT DEFINITIONS

"Gender discrimination" is unequal or disadvantageous treatment of an individual or group of individuals based on gender. Sexual harassment is a form of illegal gender discrimination. "Sexual harassment," as prohibited under federal and state law and University policy, is defined as unwelcome conduct of a sexual nature, and may include unwelcomed sexual advances, sexual assaults, or requests for sexual favors. This and other verbal or physical conduct of a sexual nature constitutes sexual harassment when:

1. submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment or academic standing;

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B. submission to or rejection of such conduct by an individual is used as the basis for employment decisions or academic decisions affecting such individual; or

C. such conduct is sufficiently serious that it has the purpose or effect of unreasonably interfering with an individual's work or academic performance or creating an intimidating, hostile, or offensive working or

academic environment. Harassment does not include verbal expressions or written material that is relevant and appropriately related to course subject matter or curriculum, and this policy shall not abridge academic freedom or the University's educational mission.

1.04 EXAMPLES OF SEXUAL HARASSMENT

It is not possible to exhaustively list all examples of conduct which can constitute gender discrimination or sexual harassment. The following list of examples of conduct prohibited by this policy statement is intended to aid in the understanding of this area. Conduct prohibited by this policy statement may include, but is not limited to:

A. VERBAL CONDUCT

Unwelcome sexual flirtation, advances or propositions for sexual activity. Asking about someone else's personal social or sexual life or about their sexual fantasies, preferences, or history may constitute sexual harassment. Discussing your own personal sexual fantasies, preferences, or history or repeatedly asking for a date from a person who is not interested may also constitute sexual harassment.

Continued or repeated verbal abuse of a sexual nature. Suggestive comments and sexually explicit jokes, or turning discussions at work or in the academic classroom to sexual topics may constitute sexual harassment. Making offensive sounds such as smacking or licking lips, making kissing sounds, or "wolf whistles" may constitute sexual harassment.

Sexually offensive or degrading language used to describe an individual or remarks of a sexual nature to describe a person's body or clothing. Calling a person a "hunk," "doll," "babe," "sugar," or "honey," or similar descriptive terms may constitute sexual harassment if the person being so described is offended by such terms or if others hearing the references are offended.

Stating, indicating, or implying in any manner that benefits will be gained or lost based on response to sexual advances.

B. NON-VERBAL

Displaying sexually demeaning or offensive objects and pictures. Nude or semi-nude photographs and drawings, or computer software is very likely to be viewed as sexual harassment.

Staring repeatedly at someone, blocking another person's path or otherwise restricting their movements. Such acts, particularly when in conjunction with other acts or comments, may be viewed as sexual harassment. Invading a person's personal body space, such as by standing closer than appropriate or necessary for the work being done may similarly constitute sexual harassment.

Bringing physical items to work which express sexually offensive comments regarding men or women. Messages of this nature such as might be contained on coffee mugs, hats, or tee shirts may be offensive and be viewed as sexual harassment.

Making sexual gestures with hands or body movements. Looking a person up and down in a suggestive or intimidating manner may also constitute sexual harassment.

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Letters, gifts, or materials of a sexual nature. Such attention may not be appreciated in the manner intended, may be offensive to the subject of the attention, and may constitute sexual harassment.

Treating a student differently based upon his/her gender in academia or extracurricular activities, academic programs, discipline, classroom assignment, physical education, grading, and/or athletics.

C. PHYSICAL

Offensive physical contact. Possible problem areas include: Massaging a person's neck or shoulders; touching a person's clothing, hair, or body; hugging, kissing, patting, or stroking a person's body; touching or rubbing oneself in a sexual manner around or in the view of another person; brushing up against another person; tearing, pulling, or yanking a person's clothing, may all constitute sexual harassment.

Sexual assault, coerced sexual intercourse or other sexual contact.

1.05 SUPERVISORY RESPONSIBILITY

Prohibited gender discrimination, including sexual harassment, may result not only from situations between supervisors and subordinate employees, or between faculty and students, but also between employees who have no direct or indirect supervisory relationship with one another, as well as between students.

University officials in supervisory relationships with employees or students are charged with the responsibility of responding immediately and appropriately to correct any situations which create a hostile working or educational environment within an administrative unit under their supervision. Such officials include, but are not necessarily limited to: unit heads, academic administrators, faculty members engaged in teaching or in supervising student workers, and intercollegiate athletic administrators and coaching staff members. Every University faculty member or administrator is responsible for promptly reporting, in writing, incidents of gender discrimination and sexual harassment (including sexual assault) that come to their attention or which they observe, to the Title IX Coordinator.

Such officials who are concerned about whether such a situation is developing, or who desire assistance in appropriately responding to such a situation may also seek assistance from the Title IX Coordinator. Any such official who fails to appropriately respond to a hostile working or educational environment, to seek assistance when a hostile working or educational environment situation develops which reasonably should have been perceived by the official, or to promptly report such matters to the Title IX Coordinator, may be subject to disciplinary action.

1.06 RETALIATION

The University will not tolerate retaliation against persons who brings a complaint of unlawful gender discrimination, sexual harassment or sexual assault, whether such complaint is brought internally or with an external agency. A student, faculty, or staff member who retaliates in any way against an individual who has brought a complaint pursuant to this policy or participated in an investigation of such a complaint is subject to disciplinary action, up to and including dismissal from the University.

2.01 GRIEVANCE PROCEDURES

All persons who believe that they have been subjected to prohibited gender discrimination or sexual harassment are encouraged to seek assistance from any of the offices listed above (§1.02), to directly report such conduct to appropriate supervisory officials, or to directly report such conduct to the Title IX

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Coordinator. In instances involving allegations of gender discrimination or sexual harassment engaged in by students, the Title IX Coordinator will refer such matters to the Student Conduct Officer for review and other processing. The Student Conduct Officer shall report the results of all such referrals to the Title IX Coordinator.

As referenced above in Section 1.05, such appropriate supervisory officials include, but are not necessarily limited to: unit heads, academic administrators, faculty members engaged in teaching or in supervising student workers, and intercollegiate athletic administrators and coaching staff members.

Persons who believe that they have been subjected to prohibited gender discrimination or sexual harassment may seek either informal or formal University evaluation and response to their concerns. However, in order for disciplinary action to be taken against a University employee or against a student, it may be necessary for a formal complaint to be filed, and that procedure may require the person complaining about such behavior to cooperate with University officials on a formal basis. Independent of a formal complaint, the University is nevertheless responsible under Title IX to investigate known concerns of gender discrimination or harassment and take steps to prevent its recurrence and correct any discriminatory effects arising therefrom.

In addition to this Policy, Oklahoma State University has in place the following general policies and procedures for dealing with concerns of unfair and/or illegal treatment:

"Policy Statement to Govern Appointments, Tenure, Promotions, and Related Matters of the Faculty of Oklahoma State University-Oklahoma City

OSU P&P Letter No. 2-0901, "Informal Ombudsman Review of Qualified Faculty Employment Issues, and Informal Voluntary Mediation of Qualified Faculty Employment Issues"

OSU P&P Letter No. 3-0710, "Resignations and Dismissals for Classified Staff"

OSU P&P Letter No. 3-0726, "Employment, Resignation, Suspensions, and Dismissals for" Administrative and Professional Staff

OSU P&P Letter No. 3-0747, "Informal Ombudsperson Review and Informal Voluntary Mediation of Qualified Staff Employment Issues"

OSU P&P Letter No. 3-0746, "Grievances and Appeals for A/P and Classified Staff"

"Student Rights and Responsibilities Governing Student Behavior, (available online at www.osuokc.edu/rights or in the Office of the Vice President for Student Services and the Office for Student Activities/Campus Life)

OSU P&P Letter No. 2-0823, "Student Discrimination Grievances" (non-gender discrimination complaints)

Students who are determined to have violated the University's policies prohibiting unlawful gender discrimination, including but not limited to sexual harassment or sexual assault, may be subject to the following disciplinary actions, Section VIII-Disciplinary Sanctions, of the University's policy "Student Rights and Responsibilities Governing Student Behavior": Oral or Written Reprimand; Restriction on Privileges; Voluntary Project Assignment, Community Service or Gender Discrimination Education; Restitution for Loss, Damage, or Injury; Enrollment Hold; Cancellation of Enrollment; Graduation Hold; Conduct Probation; Disciplinary Suspension; or Disciplinary Expulsion.

Non-faculty employees who are determined to have violated the University's policies prohibiting unlawful gender discrimination, including but not limited to sexual harassment or sexual assault, may be subject to disciplinary actions under OSU P&P Letter Nos. 3-0710 or 3-0726, as applicable, including but not limited to: Oral or Written Reprimand; Restriction on Privileges; Voluntary Project Assignment, Community Service or Gender Discrimination Education; Restitution for Loss, Damage, or Injury; Placement on Structured Plan of Improvement; Loss of Pay or Rank; Suspension With or Without Pay; or Dismissal.

Faculty employees who are determined to have violated the University's policies prohibiting unlawful gender discrimination, including but not limited to sexual harassment or sexual assault, may be subject to disciplinary

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actions under the January 21, 2000 "Policy Statement to Govern Appointments, Tenure, Promotions, and

Related Matters of the Faculty of Oklahoma State University-Oklahoma City." Such actions, under Sections 1.12 and Appendix C of the Policy Statement, can include: Simple Admonitions; Formal Sanctions (which can include, but are not limited to, written reprimands, required participation in counseling and/or corrective programs, restrictions on use of University privileges, resources, and services); or Dismissal.

2.02 Resolution Options

A person who believes that he or she has been subjected to gender discrimination or sexual harassment and seeks to take action may use the informal resolution and/or disciplinary processes listed above, or the review processes set forth in this policy, to seek review and redress of the matter. The informal resolution and formal complaint resolution processes described in this and other related University policies are not mutually exclusive. However, informal review and formal complaint review processes cannot be used at the same time, and, to conserve University resources and to prevent redundancy, the University may consolidate requests for informal review and/or formal complaints. No disciplinary investigation procedures that may be pursued as the result of gender discrimination and/or sexual harassment, will be applied to, or take the place of, investigations (informal review or formal complaint) of complaints of discrimination based on gender, including sexual harassment, that are processed pursuant to this gender discrimination grievance procedure.

In any formal resolution proceeding, the complainant possesses the right to present information relevant to his or her complaint to the appropriate investigating official. In addition, the complainant(s) and individual(s) accused are afforded the right to be advised by an individual of her or her choice throughout the formal resolution proceeding.

2.03 Informal Resolution Procedures

A. Informal resolution may be an appropriate choice when the alleged conduct involved is not of a serious or repetitive nature and disciplinary action is not required to remedy the situation. Many times, issues of concern are due to lack of communication or awareness that certain conduct is offensive and simply talking with the person engaging in the conduct in question can resolve the matter. Persons complaining of gender discrimination or sexual harassment may therefore desire to attempt to resolve the problem informally by discussing the matter with the person who is allegedly engaging in prohibited conduct. No formal investigation is involved in the informal resolution process.

B. Such informal resolution requests should be made as soon as possible, but in all cases within 90 days of the date of the alleged incident. Seeking informal resolution of a matter will not toll the 90-day time period for filing a formal complaint, as set forth below.

C. If informal discussion with a supervisory official is desired, the concerns ordinarily should first be directed to the immediate supervisor of the employee, or the Student Conduct Officer for a student,

accused of engaging in gender discrimination or sexual harassment. However, if the person complaining of gender discrimination or sexual harassment is uncomfortable discussing the matter with such immediate supervisor or Student Conduct Officer, if the person accused of engaging in prohibited conduct is the supervisor of the person lodging concerns or is the Student Conduct Officer, or if the supervisor or Student Conduct Officer has previously been made aware of the conduct at issue and is not believed to have adequately responded to the matter, the person complaining of gender discrimination or sexual harassment may discuss the matter with the next highest level of

supervisor. In all cases, such concerns may also be discussed at any time with the Director of Affirmative Action/Title IX Coordinator.

Methods for informal resolution may include, but are not limited to: coaching the person on how to directly address a situation which is causing a problem; mediating the dispute with the parties; aiding in the modification of a

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situation in which the offensive conduct occurred; arranging a documented meeting with the alleged offender that involves a discussion of the requirements of the University's policies on gender discrimination and sexual harassment; or providing education with reference to the issues of gender discrimination, sexual harassment or sexual assault.

D. Reporting and Documentation Requirements

Supervisory officials at all levels who engage in informal resolution of complaints of alleged gender discrimination, including sexual harassment, are required to promptly report such allegations, and the responsive measures taken, in writing, to the University's Title IX Coordinator. Such reports shall be made within two (2) working days of resolution of the complaint. Such officials include, but are not necessarily limited to: unit heads, academic administrators, faculty members engaged in teaching or in supervising student workers, and intercollegiate athletic administrators and coaching staff members. The Student Conduct Officer shall also make such reports to the Title IX Coordinator.

The University shall document all informal resolutions. Such documentation shall be retained by the Title IX Coordinator for at least three (3) years from the date of conclusion of the informal resolution procedure and will be kept confidential to the extent permitted by law. Informal resolution attempts shall not be considered a precondition for the filing of a written grievance.

2.04 Complaints Against Students -Formal Resolution Procedures

A. An investigation by the Student Conduct Officer responding to allegations of gender discrimination or sexual harassment and leading to possible disciplinary action against a student will be initiated if a timely and complete grievance is filed with the Student

Conduct Officer. Such an investigation shall follow the procedures set forth in Sections III through VIII of the OSU Student Rights and Responsibilities policy, except as such policies are specifically augmented in this Policy. Such a grievance must be filed, in writing, with the Student Conduct Officer within 90 calendar days of the occurrence of the alleged violation. In extraordinary circumstances, the time frame for such filing may be extended by the Student Conduct Officer to an additional 90-day time period.

B. Upon receipt of such a complaint, the Student Conduct Officer shall (1) notify the complainant within two working days, in writing, of receipt of the complaint and of the actions the Officer will take with the complaint, and (2) engage in a preliminary review of the matter to determine whether disciplinary procedures should be initiated in response to the complaint as called for in the Student Rights and Responsibilities policy. Such review, at the minimum, will normally involve meeting personally with the individual(s) filing the complaint, with the individual(s) accused of violations of University policy, and any relevant witnesses to the alleged actions at issue, together with reviewing any documentary evidence relevant to the matter. Such a determination shall ordinarily be made within ten (10) working days of the receipt by the Student Conduct Officer of the complaint. In extraordinary circumstances, the Student Conduct Officer has the authority to extend this 10-day time period. In such instances, the Student Conduct Officer shall notify the complainant and the respondent of such, and the date when the preliminary determination will be made.

C. If it is determined by the Student Conduct Officer that the University will not proceed with a disciplinary proceeding, the Student Conduct Officer will send a notification letter explaining the reason(s) to the

complainant, with a copy to the alleged offender. The notification letter will also include a statement informing the complainant that, within ten (10) working days of the notification, he or she may appeal the determination not to proceed to the Vice President for Student Services. The request for appeal must be a signed, written document articulating why the decision to dismiss the complaint is believed to be in error.

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The Vice President for Student Services shall respond within ten (10) working days of receipt of the appeal. If the decision to dismiss is upheld, that decision is final. If the decision is overturned, the complaint is sent back to the Student Conduct Officer for investigation in accordance with the procedures outlined below.

D. If it is determined that the University will proceed with a formal disciplinary proceeding, the Student Conduct Officer will give the complainant and the respondent notification of such determination as called for in Sections III through VIII of the Student Rights and Responsibilities policy. If a student conduct committee is to be convened to consider the matter under review, such hearing shall be scheduled to take place within fifteen (15) working days of such notification. In extraordinary circumstances, the Student Conduct Officer has the authority to extend this 15-day time period. In such instances, the Student Conduct Officer shall notify the complainant and the respondent of such, and the date when the hearing will be held. The hearing shall follow the procedures set forth in Sections III through VIII of the Student Rights and Responsibilities policy and the complainant and respondent shall have equal rights in all phases of the hearing and appeal processes set forth in Sections III through VIII of the Student Rights and Responsibilities policy.

2.05 Complaints against Non-Faculty Employees -Formal Resolution Procedures

A. Complaints and grievances alleging gender discrimination or sexual harassment against non-faculty staff personnel may be initiated either through the University's general employee grievance/disciplinary policies located in P&P Letter No. 3-0710, "Resignations and Dismissals for Classified Staff," or P&P Letter No. 3-0726, "Employment, Resignation, Suspensions, and Dismissals for Administrative and Professional Staff," in accordance with the status of the employee, or through the Title IX Coordinator. Such complaints filed with the Title IX Coordinator shall be transferred by the Title IX Coordinator to the appropriate unit administrator for further review and action within two (2) working days of receipt of the complaint.

An investigation in response to a complaint against a non-faculty staff employee shall follow the procedures set forth in the OSU policies governing non-faculty grievances or disciplinary actions located in P&P Letter No. 3-0710, "Resignations and Dismissals for Classified Staff," or P&P Letter No. 3-0726, "Employment, Resignation, Suspensions, and Dismissals for Administrative and Professional Staff," in accordance with the status of the employee, except as such policies are specifically augmented in this Policy.

B. A complaint alleging gender discrimination or sexual harassment allegedly committed by a non-faculty staff employee may be filed, in writing, with either the appropriate unit administrator or with the Title IX Coordinator within 90 calendar days of the occurrence of the alleged violation. In extraordinary circumstances, the time frame for such filing may be extended by the unit administrator or the Title IX Coordinator to an additional 90-day time period.

C. Unit administrators who receive complaints alleging gender discrimination or sexual harassment allegedly committed by non-faculty staff employees, shall notify the Director of Human Resources/Title IX Coordinator of their receipt of such a complaint within two (2) working days of receiving the complaint.

D. Upon receipt of a grievance or complaint against a non-faculty staff employee, the Director of Human Resources/Title IX Coordinator, or the unit administrator, as appropriate, shall (1) notify the complainant within two working days, in writing, of receipt of the complaint and of the actions that will be taken with the complaint, and (2) engage in a preliminary review of the matter to determine whether formal grievance or disciplinary procedures should be initiated in response to the complaint. Such a determination shall ordinarily be made within ten (10) working days of the receipt by the unit administrator or Department of Human Resources of the complaint. In extraordinary circumstances, the Director of Human Resources or appropriate unit administrator has the authority to extend this 10-day time period. In such instances, the complainant and the respondent shall be notified of such, and the date when the preliminary determination will be made.

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E. Where formal grievance proceedings are requested due to allegations of gender discrimination or sexual harassment by non-faculty employees, if it is determined by the Director of Human Resources that the University will not proceed with a formal grievance proceeding, the Director of Human Resources will send a notification letter explaining the reason(s) to the complainant, with a copy to the alleged offender. The notification letter will also include a statement informing the complainant that, within ten (10) working days of the notification, he or she may appeal the determination not to proceed to the Vice President for Finance and Operations. The request for appeal must be a signed, written document articulating why the decision to dismiss the complaint is believed to be in error.

The Vice President for Finance and Operations shall respond within ten (10) working days of receipt of the appeal. If the decision to dismiss is upheld, that decision is final. If the decision is overturned, the complaint is sent back to the Director of Human Resources for action in accordance with the procedures outlined in P&P Letter No. 3-0746, "Grievances and Appeals for Administrative/Professional and Classified Staff".

F. Where formal disciplinary action is requested due to allegations of gender discrimination or sexual harassment by non-faculty employees, if it is determined by the unit administrator that the University will not proceed with a formal disciplinary action, the unit administrator will send a notification letter explaining the reason(s) to the complainant, with a copy to the alleged offender.

The notification letter will also include a statement informing the complainant that, within ten (10) working days of the notification, he or she may appeal the determination not to take disciplinary action to the Vice President charged with supervision over the unit. The request for appeal must be a signed, written document articulating why the decision to dismiss the complaint is believed to be in error.

The Vice President shall respond within ten (10) working days of receipt of the appeal. If the decision to dismiss is upheld, that decision is final. If the decision is overturned, the complaint is sent back to the unit administrator for action in accordance with the procedures outlined in P&P Letter No. 3-0710, "Resignations and Dismissals for Classified Staff," or P&P Letter No. 3-0726, "Employment, Resignation, Suspensions, and Dismissals for Administrative and Professional Staff," in accordance with the status of the employee.

G. If it is determined that disciplinary action will be taken in response to the complaint, the unit administrator will proceed with such action, following P&P Letter No. 3-0710, "Resignations and Dismissals for Classified Staff," or P&P Letter No. 3-0726, "Employment, Resignation, Suspensions, and Dismissals for Administrative and Professional Staff," in accordance with the status of the employee, relating to imposing disciplinary action against non-faculty employees. The unit administrator shall give the complainant and the respondent notification of such determination. Such action and notification shall normally be concluded within fifteen (15) working days of the receipt by the unit administrator of the complaint. In extraordinary circumstances, the unit administrator has the authority to extend this 15-day time period. In such instances, the unit administrator shall notify the complainant and the respondent of such, and the date when the disciplinary process will be concluded.

2.06 Complaints against Faculty Employees -Formal Resolution Procedures

A. The University's policies for formal complaints against members of the faculty are set forth in the "Policy Statement to Govern Appointments, Tenure, Promotions, and Related Matters of the Faculty of Oklahoma State University" (January 21, 2000) ("the Policy Statement"). A grievance of gender discrimination or sexual harassment allegedly committed by members of the faculty may be initially filed with the Title IX Coordinator or

the appropriate academic unit administrator. If such complaints are filed with the Title IX Coordinator, such complaints shall be transferred for review and action by the Title IX Coordinator to the appropriate academic

unit administrator within two (2) working days of receipt of such complaint, with a copy transmitted to the Vice President for Academic Affairs. Within two (2) working days of the academic unit administrator's receipt of the complaint, the administrator shall notify the complainant, in writing, of receipt of the complaint and of the actions the academic unit administrator will take with the complaint.

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B. In instances not involving the possible dismissal of a faculty member due to alleged gender discrimination or sexual harassment, the appropriate academic unit administrator (or substitute academic administrator appointed by the Vice President for Academic Affairs as authorized in the Policy Statement) shall review the complaint and take responsive action as deemed appropriate normally within thirty (30) working days, following due process provisions as set forth in the Policy Statement.

C. Where formal disciplinary action not involving possible dismissal is requested due to allegations of gender discrimination or sexual harassment by a faculty member, if it is determined by the unit administrator that the University will not proceed with a formal disciplinary action, the unit administrator will send a notification letter explaining the reason(s) to the complainant, with a copy to the alleged offender. The notification letter will also include a statement informing the complainant that, within ten (10) working days of the notification, he or she may appeal the determination not to take disciplinary action to the Division Head charged with supervision over the unit. The request for appeal must be a signed, written document articulating why the decision to dismiss the complaint is believed to be in error.

The Division Head shall respond within ten (10) working days of receipt of the appeal. If the decision not to take disciplinary action is upheld, that decision is final. If the decision is overturned, the complaint is sent back to the unit administrator for action in accordance with the procedures outlined in the University's disciplinary procedures for faculty.

In instances involving the possible dismissal of a faculty member due to alleged gender discrimination or sexual harassment, the procedures set forth in the General Termination Procedures of the Policy Statement shall be followed.

2.07 Formal Resolution Reporting and Documentation Requirements

Officials taking action via formal disciplinary or grievance proceedings (whether involving student, non-faculty staff, and members of the faculty) in response to complaints of alleged gender discrimination or sexual harassment are required to report such actions, in writing, to the University's Title IX Coordinator. Such reports shall be made within two (2) working days of resolution of the complaint. Such officials include, but are not necessarily limited to: unit heads, academic administrators, faculty members engaged in teaching or in supervising student workers, and intercollegiate athletic administrators and coaching staff members. The Student Conduct Officer shall also make such reports to the Title IX Coordinator.

The University shall document formal resolutions. Such documentation shall be retained by the Title IX Coordinator for at least three (3) years from the date of conclusion of the formal resolution procedure and will be kept confidential to the extent permitted by law.

3.01 Title IX Coordinator Review Authority

Nothing contained in this Policy shall be construed to limit or qualify the authority of the Title IX Coordinator to independently review any allegations of gender discrimination or sexual harassment on an informal basis and to make such reports as the Title IX Coordinator deems appropriate and necessary to University administrators.

Appendix A

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION 29 CFR Part 1604

DISCRIMINATION BECAUSE OF SEX UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964, AS AMENDED; ADOPTION OF FINAL INTERPRETIVE GUIDELINES AGENCY: Equal Employment Opportunity Commission.

ACTION: Final Amendment to Guidelines on Discrimination Because of Sex.

SUMMARY: On April 11, 1980, the Equal Employment Opportunity Commission published the Interim Guidelines on sexual harassment as an amendment to the Guidelines on Discrimination Because of Sex, 29 CFR part 1604.11, 45 FR 25024. This amendment will reaffirm that sexual harassment is an unlawful employment practice. The EEOC received public comments for 60 days subsequent to the date of publication of the Interim Guidelines. As a result of the comments and the analysis of them, these Final Guidelines were drafted.

EFFECTIVE DATE: November 10, 1980.

FOR FURTHER INFORMATION CONTACT: Karen Danart, Acting Director, Office of Policy Implementation, Equal Employment Opportunity Commission, 2401 E Street, NW, Washington, D.C. 20506, (202) 634-7060.

(Supplementary information concerning comments received on the interim guidelines, and relevant case law is omitted.)

Accordingly, 29 CFR Chapter XIV, Part 1604 is amended by adding § 1604.11 to read as follows: PART 1604-GUIDELINES ON DISCRIMINATION BECAUSE OF SEX
§ 1604.11 Sexual harassment.

(a) Harassment on the basis of sex is a violation of Sec. 703 of Title VII. The principles involved here continue to apply to race, color, religion or other origin. Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature constitute sexual harassment when

(1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment,

(2) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual, or

(3) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

(b) In determining whether alleged conduct constitutes sexual harassment, the Commission will look at the record as a whole and at the totality of the circumstances, such as the nature of the sexual advances and the context in which the alleged incidents occurred. The determination of the legality of a particular action will be made from the facts, on a case by case basis.

(c) Applying general Title VII principles, an employer, employment agency, joint apprenticeship committee or labor organization (hereinafter collectively referred to as "employer") is responsible for its acts and those of its agents and supervisory employees with respect to sexual harassment

1-0702.11

regardless of whether the specific acts complained of were authorized or even forbidden by the employer and regardless of whether the employer knew or should have known of their occurrence. The Commission will examine the circumstances of the particular employment relationship and the job functions performed by the individual in determining whether an individual acts in either a supervisory or agency capacity.

(d) With respect to conduct between fellow employees, an employer is responsible for acts of sexual harassment in the workplace where the employer (or its agents or supervisory employees) knows or should have known of the conduct, unless it can show that it took immediate and appropriate corrective action.

(e) An employer may also be responsible for the acts of non-employees, with respect to sexual harassment of employees in the workplace, where the employer (or its agents or supervisory employees) knows or should have known of the conduct and fails to take immediate and appropriate corrective action. In reviewing these cases the Commission will consider the extent of the employer's control and any other legal responsibility which the employer may have with respect to the conduct of such non-employees.

(f) Prevention is the best tool for the elimination of sexual harassment. An employer should take all steps necessary to prevent sexual harassment from occurring, such as affirmatively raising the subject, expressing strong disapproval, developing appropriate sanctions, informing employees of their right to raise and how to raise the issue of harassment under Title VII, and developing methods to sensitize all concerned.

(g) Other related practices: Where employment opportunities or benefits are granted because of an individual's submission to the employer's sexual advances or requests for sexual favors, the employer may be held liable for unlawful sex discrimination against other persons who were qualified for but denied that employment opportunity or benefit.

(Title VII, Pub. L. 88-352, 78 Stat. 253 (42 V.S.C. 2000e et seq.) (FR Doc. 80-34981 Filed 11-7-80, 8:45 a.m.) Billing Code 6570-06-M

Federal Register Vol.45, No. 219/Monday, November 10, 1980/Rules and Regulations 74676-74677

Exhibit D: Sex Discrimination Guidelines

COMPLIANCE WITH SEX DISCRIMINATION GUIDELINES

41 CFR § 60-20

Oklahoma State University has undertaken initiatives to address concerns of female employees as part of the overall evaluation and development of the affirmative action program. In doing so, the University has taken action that is consistent with the steps described in the regulations, as follows:

- All advertisements for positions at Oklahoma State University contain the following equal opportunity employer statement: “OSU is an AA/EEO/E-verify employer.”
- University Board policies 1-0101 and 1-0702^[1] expressly prohibit discrimination on the basis of sex, and provide for a full investigation of any allegations to be conducted by the branch Human Resources designee in cooperation with the Equal Opportunity Officer.
- The OSU wage and salary administration program for staff employees evaluates positions according to specific criteria without regard to the sex.
- The University benefits programs are administered in accordance with federal and state law. Contributions to pension programs are equal for men and women receiving equal income.
- OSU policies and procedures are administered without regard for marital or familial status regardless of sex.
- OSU provides appropriate physical facilities to both sexes.
- Retirement age for employees, including early retirement, is the same for men and women.
- Any employee meeting the eligibility criteria in the Family Medical Leave Act (FMLA) may take leave without pay following the delivery or adoption of a child without loss of employment, as detailed in the FMLA policy.
- OSU does not base employment decisions on any seniority system; therefore, sex-based seniority systems do not exist and no action is necessary.
- OSU prohibits discrimination in salary administration on the basis of sex.
- OSU has had an affirmative action program in place since 1972 to locate and employ women.
- All staff development and training programs are open to employees regardless of sex, per University policy. These training classes are available free of charge to all faculty, staff, and students.
- OSU’s policy prohibiting discrimination and harassment, including sexual harassment, is disseminated internally and externally on the internet at http://www.okstate.edu/osu_per/policy_proced.php

^[1]See Appendices M and N, respectively.

FOR SEXUAL ASSAULT COMPLAINTS CONTACT:

OSU-Oklahoma City Office of Safety and Security
Business Technology Building, Room 100
(405) 945-9111

FOR PSYCHOLOGICAL ASSISTANCE, CONTACT:

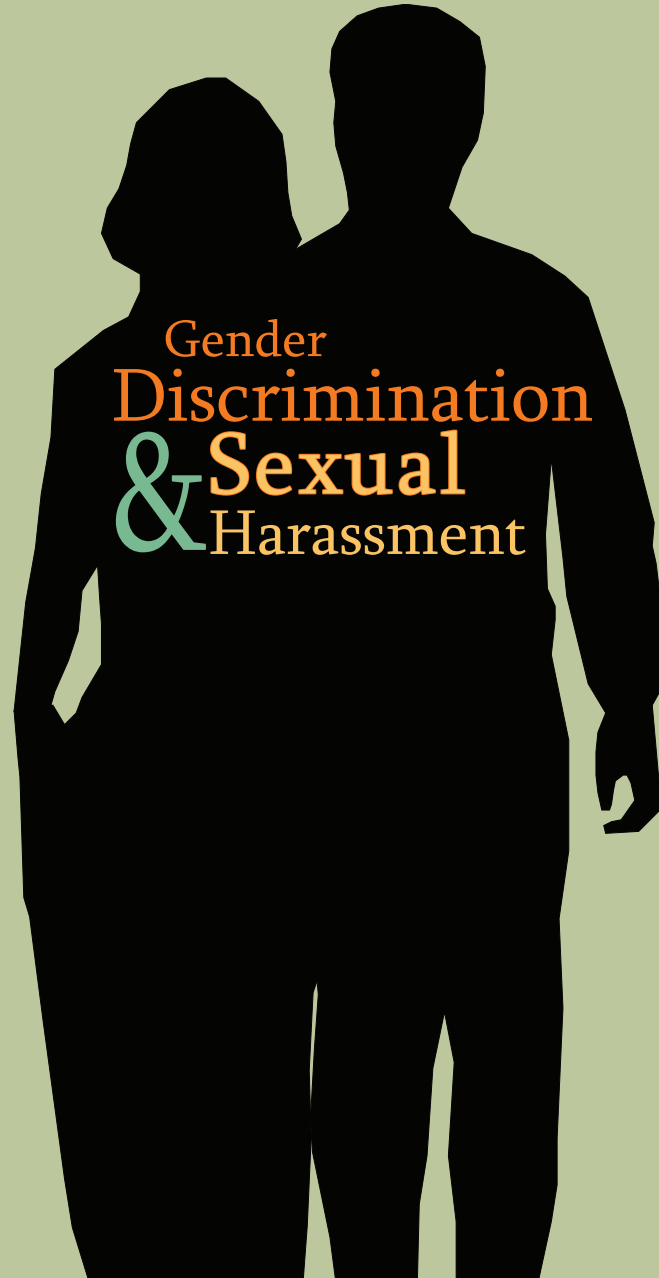
Dr. Bill Gentry
OSU Employee Assistance Program Coordinator
Program 103 Seretean Wellness Center
(405) 744-6415
bill.gentry@okstate.edu

For a copy of the Oklahoma State University
Gender Discrimination/Sexual Harassment Policy &
Title IX Grievance Procedure 1-0702 go to:

OSU-Oklahoma City Human Resources
Affirmative Action Office
Administration Building, Room 212

Online:
<http://www.osuokc.edu/download/GDSH-Policy.pdf>

Oklahoma State University-Oklahoma City supports the American Disabilities Act (ADA) and welcomes requests for reasonable accommodation. For ADA accommodations, please contact the Office of Services to Students with Disabilities at (405) 945-3385. Oklahoma State University - Oklahoma City in compliance with Title VI and VII of the Civil Rights Act of 1964, Executive Order 11246 as amended, Title IX of the Education Amendments of 1972, American Disabilities Act of 1990, and other federal laws and regulations, does not discriminate on the basis of race, color, national origin, sex, age, religion, disability or status as a veteran in any of its policies practices or procedures. This includes but is not limited to admissions, employment, financial aid and educational services. This publication, issued by Oklahoma State University - Oklahoma City as authorized by Human Resources, was printed by OSU-OKC Print and Mail Services at a cost of \$???. (250/12/12)



UNIVERSITY POLICY

Oklahoma State University-Oklahoma City PROHIBITS gender discrimination in any form, including sexual harassment of students, faculty and staff (OSU Gender Discrimination/Sexual Harassment Policy & Title IX Grievance Procedure 1-0702). All students, faculty and staff are required to comply with this policy. OSU-Oklahoma City subscribes to an educational and work environment where everyone is treated with respect and dignity and, therefore, condemns insulting, degrading and exploitive treatment of its students and employees. The University strives to maintain a safe, non-discriminatory environment for all members of its campus community.

THE LAW

Gender discrimination and sexual harassment are prohibited by Title VII of the Civil Rights Act of 1964 as amended, Title IX of the Education Amendments of 1972 and Title 25 of the Oklahoma Statutes.

I. GENDER DISCRIMINATION DEFINED

Gender discrimination is unequal or disadvantageous treatment of an individual or group of individuals based on gender. Sexual harassment is a form of illegal gender discrimination.

Gender discrimination can be treating an individual differently based upon his/her gender in academic or extracurricular activities, academic programs, discipline, classroom assignment, physical education, grading and/or athletics.

EXAMPLES OF GENDER DISCRIMINATION

The following types of conduct may constitute gender discrimination:

- A professor constantly makes remarks in class that males aren't as smart or dedicated to learning as females.
- A department head hires only male computer technicians, because he doesn't think women are as competent.
- A male student has been discouraged from applying to the nursing program because it is a traditional "female" field.

II. SEXUAL HARASSMENT DEFINED

Sexual harassment, as prohibited under federal law, state law and University policy, is defined as unwelcome sexual advances, sexual assaults or requests for sexual favors, and other verbal or physical conduct of a sexual nature. This conduct constitutes sexual harassment when:

- submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment or academic standing, or
- submission to or rejection of such conduct by an individual is used as the basis for employment decisions or academic decisions affecting such individual, or
- such conduct has the purpose or effect of unreasonably interfering with an individual's work or academic performance or creating an intimidating, hostile or offensive educational or work environment.

Sexual harassment can be based on an individual's perception of the events in question. Conduct (verbal and/or physical) based on sex or gender, that is not welcome, can constitute sexual harassment.

If conduct is unwelcome, could be offensive to a reasonable person and, in fact, is offensive to someone complaining about certain physical and/or verbal acts, then the conduct may constitute sexual harassment, even if it was not intended to be offensive.

Sexual harassment can occur between any two individuals. Although sexual harassment typically occurs when one person is in a position of power over another, it can also occur among peers. Sexual harassment can also occur if a supervisor or faculty member grants special favors or opportunities to a person with whom they are having a sexual relationship, but does not grant similarly equal opportunities or advantages to other persons.

Sexual harassment may also occur, in some cases, if employees of contractors or vendors performing services or doing business with the University engage in harassing conduct.

EXAMPLES OF SEXUAL HARASSMENT

The following types of conduct may constitute sexual harassment:

- Inappropriate touching, patting or pinching
- Displaying sexually demeaning or offensive objects and pictures
- Physical assault or coerced sexual activity
- Sexually suggestive jokes or innuendoes; derogatory, degrading or sexist remarks about a person's body, clothing or sexual activities
- Suggestive of insulting sounds, whistles, catcalls
- Obscene phone calls, email or gestures

EXAMPLES OF SEXUAL HARASSMENT WITHIN THE WORK AND ACADEMIC ENVIRONMENT

Sharon's supervisor kept asking her for a date. He said getting to know him better would improve her chances for a promotion. She felt uncomfortable and wished he would stop. She kept refusing him, but he wouldn't take "no" for an answer.

What should Sharon do?

She may go to her supervisor's supervisor or appropriate administrator, the director of Human Resources/Affirmative Action, or one of the other individuals listed at the end of this brochure.

Cindy's professor told her that refusal to have a sexual relationship with him would result in a lower grade in his course.

What should Cindy do?

She may go to the department head or division head for which the instructor works, or one of the individuals listed at the end of this brochure.

Barbara, a student in a student organization, constantly makes derogatory jokes about men's bodies during the weekly meetings. The male students in the organization are embarrassed by her remarks.

What should the male students in this case do?

They may go to the sponsor/advisor of the student organization, the Student Conduct officer or one of the individual listed at the end of this brochure.



STALKING

Stalking is a form of harassment and is a criminal offense in the state of Oklahoma according to Title 21 of the Oklahoma Statutes. Stalking occurs when a person willfully, maliciously and repeatedly follows or harasses another person in a manner that would cause a reasonable person to feel frightened, intimidated, threatened, harassed or molested.

CONSENSUAL RELATIONSHIP

Although OSU-Oklahoma City does not have a policy prohibiting consensual amorous relationships, such relationships, between two individuals in which a power differential exists, may lead to difficulties and future misunderstanding. Particularly when a faculty member and student are in the same academic unit or in units that are academically allied, or when a supervisor and employee are in the same administrative unit, relationships that the parties view as consensual may appear to others to be exploitative. Further, in such situations, the faculty member or supervisor may face serious conflicts of interest and should be careful to distance himself/herself from any decisions that may reward or penalize the student or employee involved.

RESPONSIBILITIES OF THE PERSON BEING SEXUALLY HARASSED

Say "NO!" Tell the harasser to stop and that the conduct is unwanted and unwelcome.

Give the harasser a copy of the Gender Discrimination/Sexual Harassment Policy (Available in the Office of the Vice President for Student Services and/or the Human Resources Office.)

IF YOU CHOOSE TO HANDLE THE SITUATION ON YOUR OWN, YOU CAN:

Send the harasser a letter – a factual account of what happened, how it made you feel and what you want to happen next. Keep a copy for yourself.

Record or document all incidents. Record the dates, times and places. Keep detailed notes of what happened and names of any witnesses.

If harassment continues, report it. DO NOT IGNORE IT!

Promptly report any sexual harassment through the appropriate administrative channels.

RESPONSIBILITIES OF PERSON RECEIVING COMPLAINT

- Listen.
- Take the report seriously.
- DON'T tell the student/supervisee that they ought to be able to handle it themselves, that they have no sense of humor or they are taking the behavior too seriously.
- Know who to refer the person to and encourage the complainant to meet with the designated person.
- If you are handling the situation and don't know what to do, call the OSU-Oklahoma City Human Resources Office, (405) 945-3298.
- **Complete the intake form at:** <http://www.osuokc.edu/download/Intake-Form.pdf>
- Provide follow up.

CONFIDENTIALITY

Confidentiality shall be maintained to the greatest extent possible within the requirements of conducting reasonable investigations. Only those who have an immediate need to know may find out the identity of the parties.

RETALIATION

It is illegal to retaliate against anyone who complains about sexual harassment or assists in a sexual harassment complaint. Retaliation, threats or other forms of intimidation against any party involved WILL NOT BE TOLERATED.

PREVENTING SEXUAL HARASSMENT

Each member of the campus community is responsible for preventing sexual harassment and ensuring that the work and academic environments are harassment-free. Become informed about sexual harassment. Evaluate your own behavior to ensure that you are not engaging in sexual harassment.

ASK YOURSELF

“Was my behavior appropriate?”

“Was my behavior welcomed?”

“Was my behavior offensive?”

SUGGESTED RESOURCES

Sexual harassment is serious and it is important that you talk with someone about it. You may contact your teacher, your department head or appropriate administrator.

You may also contact:

OSU-Oklahoma City Employees (Faculty and Staff)

Melissa Herren
OSU-Oklahoma City
Human Resources Director
Affirmative Action Officer
Title IX Coordinator
Administration Building
Room 212
(405) 945-3298

Ronda Reece
OSU-Oklahoma City
Finance & Operations
Vice President
Administration Building
Room 218
(405) 945-8631

OSU-Oklahoma City Student

Kristi Pendleton
OSU-Oklahoma City
Student Conduct Officer
Student Center
Room 102A
(405) 945-3778

Brad Williams
OSU-Oklahoma City
Student Services
Vice President
Student Center
Room 180
(405) 945-3204

Dr. Bill Pink
OSU-Oklahoma City
Academic Affairs
Vice President
Administration Building
Room 200
(405) 945-3376



OKLAHOMA STATE UNIVERSITY INSTITUTE OF TECHNOLOGY
POLICY & PROCEDURES LETTER

Equal Opportunity/Affirmative Action	1-001 ADMINISTRATIVE July 2009
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POLICY

1.01 Oklahoma State University Institute of Technology will:

- Be a complete equal opportunity employer in all phases of operations, toward the end of attaining the University's basic mission and goals.
- Provide equal employment and/or educational opportunity on the basis of merit and without discrimination because of age, race, ethnicity, color, sex, religion, national origin, veterans' status or qualified disability;
- Sexual harassment is condemned in the recruitment, appointment and advancement of employees, in the evaluation of students' academic performance, and through the creation of hostile working or educational environments;
- Apply equal opportunity in the recruitment, hiring, placement, training, promotion and termination of all employees; and to all personnel actions such as compensation, education, tuition assistance, and social and recreational programs. The University shall consistently and aggressively monitor these areas to ensure that any differences which may exist are the results of bona fide qualification factors other than age, race, ethnicity, color, sex, religion, national origin, veterans' status or qualified disability;
- Ensure that each applicant offered employment at Oklahoma State University Institute of Technology shall be selected on the basis of qualification, merit and professional ability; and
- Provide and promote equal educational opportunity to students in all phases of the academic program and in all phases of the student life program; and consistently and aggressively monitor these areas to ensure that any differences which may exist are the results of bona fide factors other than age, race, ethnicity, color, sex, religion, national origin, veterans' status or qualified disability.

OKLAHOMA STATE UNIVERSITY INSTITUTE OF TECHNOLOGY
POLICY & PROCEDURES LETTER

PROCEDURES

- 2.01 The University has a written affirmative action program to implement its official policies of equal opportunity employment. Statements are published regularly as to the official stance of the University in regard to discrimination and equal opportunity employment. The continuing policy of the University is to actively and aggressively locate, recruit, place, upgrade and promote members of ethnic minority groups and women at all levels of the University.
- 2.02 The responsibility for the recruitment of faculty shall continue to be delegated to division chairs. The responsibility for the recruitment of administrative and professional staff shall continue to be delegated to the appropriate unit leaders. The responsibility for the recruitment of classified staff shall be delegated to Human Resources in conjunction with appropriate supervisors. The responsibility of Human Resources shall be to refer the names of qualified candidates to supervisors.
- 2.03 A Recruitment Report is used to implement the University's plan for affirmative action in regard to equal opportunity employment. This form indicates the number of persons considered for employment, their race and sex, and the reasons why the person selected was offered employment. These reports, tabulated on a regular basis, are reviewed by the Affirmative Action Office and the appropriate administrators.
- 2.04 Human Resources will work with the Oklahoma State University Director of Affirmative Action in fulfilling the equal opportunity responsibilities in his/her designated subdivision.

Approved: August 1996
Revised: October 2006
Revised: July 2009

1-001.2

OKLAHOMA STATE UNIVERSITY INSTITUTE OF TECHNOLOGY
POLICY & PROCEDURES LETTER

Sexual Harassment	1-009 ADMINISTRATIVE July 2009
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POLICY

- 1.01 Oklahoma State University Institute of Technology explicitly condemns sexual harassment of students, staff, and faculty and will not tolerate such conduct on or off campus. Sexual harassment is unlawful and may subject those who engage in it to college disciplinary sanctions as well as civil and criminal penalties. Sexual harassment is prohibited in the workplace and in the recruitment, appointment, and advancement of employees. Sexual harassment of students is prohibited in and out of the classroom and in the evaluation of student academic or work performance. The College reserves the authority to independently deal with sexual harassment issues whenever becoming aware of their existence, regardless of whether informal or formal complaints have been lodged by persons alleging such issues.
- 1.02 Members of the college community holding positions of authority involving the legitimate exercise of power over others have a particular responsibility to be sensitive to that power relationship. Supervisors, in their relationships with students and subordinates, need to be aware of potential conflicts of interest and the possible compromise of their evaluative capacity. Because there is an inherent power difference in these relationships, the potential exists for the less powerful persons to perceive a coercive element in suggestions regarding activities outside those appropriate to the professional relationship. It is the responsibility of the staff to behave in such a manner that their words or actions cannot reasonably be perceived as sexually coercive, abusive, or exploitative.
- 1.03 Grievance procedures consistent with the principles of due process have been developed and implemented for employees and students, and are available from the Office of Human Resources.

GUIDELINES

Definitions: Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of sexual nature constitute sexual harassment when:

- 1) Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment or academic standing;
- 2) Submission to or rejection of such conduct by an individual is used as the basis for employment decisions or academic decisions affecting such individual; or

OKLAHOMA STATE UNIVERSITY INSTITUTE OF TECHNOLOGY
POLICY & PROCEDURES LETTER

- 3) Such conduct has the purpose or effect of unreasonably interfering with an individual's work or academic performance or creating an intimidating, hostile, or offensive working or academic environment.

Information Sources: If a person alleging sexual harassment does not know who to talk to regarding allegations of sexual harassment, they may seek assistance from the Director of Human Resources. If an extraordinary conflict of interest would prevent use of the usual informal or formal review procedures, the person alleging sexual harassment may request assistance directly from the Office of the President.

PROCEDURES

- 2.01 All persons who believe that they have been subjected to prohibited sexual harassment are encouraged to report such conduct to appropriate college officials. It is not necessary that a person alleging sexual harassment file a formal complaint in order for the college to evaluate the matter and/or attempt to informally resolve the situation. Persons who believe that they have been subjected to prohibited sexual harassment may seek informal or formal college evaluation and responses to their concerns. However, in order for disciplinary action to be taken against a college employee, it may be necessary for a formal complaint to be filed, and that process may require the person alleging such behavior to cooperate with college officials on a formal basis.
- 2.02 This policy will be published in the student and employee handbooks, the student rights and responsibilities document, and the Oklahoma State University Institute of Technology Policy and Procedures Manual.
- 2.03 This policy will be administered through the grievance procedures for employees and students respectively.

Approved: February 2008
Revised: July 2009

¹Complaints and grievances concerning sex discrimination will be reviewed under the appropriate grievance procedures for the accuser. Complaints and grievances concerning disciplinary actions will be reviewed under the appropriate grievance procedures for the person accused.

OKLAHOMA STATE UNIVERSITY INSTITUTE OF TECHNOLOGY
POLICY & PROCEDURES LETTER

Americans with Disabilities Act (ADA)	1-012 ADMINISTRATIVE July 2009
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POLICY

- 1.01 Oklahoma State University Institute of Technology is committed to serving the needs of individuals with disabilities in accordance with the Rehabilitation Act of 1973 and the Americans with Disabilities Act (ADA) of 1990. Oklahoma State University Institute of Technology will not discriminate against any qualified student, employee or job applicant with respect to any terms, privileges or conditions of enrollment or employment because of a person's physical or mental ability.
- 1.02 Oklahoma State University Institute of Technology also makes reasonable accommodation wherever necessary for all students, employees, or applicants with disabilities, provided that the individual is otherwise qualified to enroll in courses of study or safely perform the duties and assignments connected with the job.

PROCEDURES

- 2.01 Oklahoma State University Institute of Technology, realizing the legislative intent in this measure, will conform to its terms to the strictest degree and will use this Act as a blueprint for the future.
- 2.02 Oklahoma State University Institute of Technology will take requests from students or employees concerning the ADA, and these requests will be acted upon by the Coordinator for ADA Compliance and the Section 504 Coordinator.

Approved: August 1996
Revised: August 2006
Revised: July 2009

OKLAHOMA STATE UNIVERSITY INSTITUTE OF TECHNOLOGY
POLICY & PROCEDURES LETTER

Drug Free Campus

**1-018
ADMINISTRATION
July 2009**

POLICY

- 1.01 The Drug Free Schools and Communities Act Amendments of 1989 require an institution of higher education to certify to the U.S. Department of Education, that it has adopted and implemented a program to prevent the unlawful possession, use, or distribution of illicit drugs and alcohol by students and employees in order to remain eligible for federal financial assistance of any kind.
- 1.02 As set forth in local, state, and federal laws, and the rules and regulations of Oklahoma State University Institute of Technology prohibits the unlawful possession, use or distribution of illicit drugs and alcohol by students and employees in buildings, facilities, grounds, or other property owned and/or controlled by Oklahoma State University Institute of Technology or as part of University activities.

PROCEDURES

2.01 Internal Sanctions

Any student or employee of Oklahoma State University Institute of Technology alleged to have violated this prohibition shall be subject to disciplinary action including, but not limited to, expulsion, termination of employment, referral for prosecution and/or completion, at the individual's expense, or an appropriate rehabilitation program. Any disciplinary action shall be taken in accordance with applicable policies of the University.

2.02 External Sanctions

Local, state, and federal laws provide for a variety of legal sanctions for the unlawful possession and distribution of illicit drugs and alcohol. These sanctions include, but are not limited to, incarceration and monetary fines.

Federal law provides rather severe penalties for distributing or dispensing, or possessing with the intent to distribute or dispense a controlled substance, and penalties of a less severe nature for simple possession of a controlled substance. The type and quantity of the drug, whether the convicted person has any prior convictions, and whether death or previous injury resulted from use of the drug in question (this, however, is not a factor in a case of simple possession) all affects the sentence. (For more information contact Campus Police or the District Attorney's office.)

OKLAHOMA STATE UNIVERSITY INSTITUTE OF TECHNOLOGY
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- A. "Illicit drug use" is defined as the use of illegal drugs and the abuse of other drugs and alcohol, including anabolic steroids.
- B. A drug and/or alcohol abuse assistance/rehabilitation previously approved and/or certified by such purpose(s) by a federal, state, or local health, law enforcement, or other appropriate agency.
- C. Cocaine, marijuana, opiates, amphetamines, and other designated substances as set forth in Section 202 of the Controlled Substances Act (21 U.S.C., Sec. 812).
- D. Cocaine, marijuana, opiates, amphetamines, and any other drug or substance as set forth in Schedules I through V of the Uniform Controlled Dangerous Substances Act, 63 O.S. 1981, Sec.2-101, et seq., as amended.

2.03 Drug/Alcohol Counseling and Rehabilitation Programs

The Campus Counselor will provide drug/alcohol counseling to students and employees, respectively. Should these programs not meet an individual's needs, there are other programs in the community or nearby. A list of such programs, their location and phone number is maintained in the above-referenced office. Seeking help from, being referred to or from these services is confidential, and will not, alone, result in disciplinary action. Individual privacy will, of course, be maintained in any counseling/rehabilitation process. In addition, the following toll free, hotline numbers may be used for help or advice:

Program	Phone Number	Hours of Operation
National Institution on Drug Abuse Information and Referral Line	1-800-662-HELP	M-F, 8:30 a.m. - 4:30 p.m.
The National Federal of Parents for Drug-Free Youth	1-800-554-KIDS	M-F, 8:00 a.m. - 5:00 p.m.
Just Say No Foundation	1-800-258-2766	
National Council on Alcoholism	1-800-622-2255	7 Days a Week 24 Hours a Day
National Drug Abuse Hotline	1-800-241-9746	
Cocaine Helpline	1-800-COCAINE	
Reach-Out Hotline(alcohol, drug crisis intervention, mental health and referral)	1-800-522-9054	

OKLAHOMA STATE UNIVERSITY INSTITUTE OF TECHNOLOGY
POLICY & PROCEDURES LETTER

OTHER

3.01 Health Risks.

Alcohol and other drug use represent serious threats to health and the quality of life. Thousands of people die each year from drug-related accidents or health problems. With most drugs it is probable that users will develop psychological and physical dependence. The general categories of drugs and their effects are as follows:

Alcohol - short-term effects include behavioral changes, impairment of judgment and coordination, greater likelihood of aggressive acts, respiratory depression, irreversible physical and mental abnormalities in newborns (fetal alcohol syndrome) and death. Long-term effects of alcohol abuse include damage to the liver, heart and brain, ulcers, gastritis, malnutrition, delirium tremors, and cancer. Alcohol combined with other barbiturates/depressants can prove to be a deadly mixture.

Amphetamines/Stimulants - (speed, uppers, crank, caffeine, etc.) speed up the nervous system which can cause increased heart and breathing rates, higher blood pressure, decreased appetite, headaches, blurred vision, dizziness, sleepiness, anxiety, hallucinations, paranoia, depression, convulsions and death due to a stroke or heart failure.

Anabolic Steroids - seriously affect the liver, cardiovascular, and reproductive systems. Can cause sterility in males and females, as well as impotency in males.

Barbiturates/Depressants - (downers, Quaaludes, Valium, etc.) slows down the central nervous system which can cause decreased heart and breathing rates, lower blood pressure, slowed reactions, confusion, distortion of reality, convulsion, respiratory depression, coma, and death. Depressants combined with alcohol can be lethal.

Cocaine/Crack - stimulates the central nervous system and is extremely addictive; both psychologically and physically. Effects include dilated pupils, increased heart rate, elevated blood pressure, insomnia, loss of appetite, hallucinations, paranoia, seizures, and death due to cardiac arrest or respiratory failure.

Hallucinogens - (PCP, angel dust, LSD, etc.) interrupt the functions of the part of the brain which controls the intellect and instincts. May result in self-inflicted injuries, impaired coordination, dulled senses, incoherent speech, depression, anxiety, violent behavior, paranoia, hallucinations, increased heart rate and blood pressure, convulsions, coma, and heart and lung failure.

OKLAHOMA STATE UNIVERSITY INSTITUTE OF TECHNOLOGY
POLICY & PROCEDURES LETTER

Cannabis - (marijuana, hashish, hash, etc.) impairs short-term memory, comprehension, concentration, coordination, and motivation. May also, cause paranoia and psychosis. Marijuana smoke contains more cancer-causing agents than tobacco smoke. The way, in which marijuana is smoked, deeply inhaled and held in the lungs for a long period, enhances the risk of getting cancer. Combined with alcohol, marijuana can produce a dangerous multiplied effect.

Narcotics - (smack, horse, Demerol, Percodan, etc.) - initially produce feelings of euphoria often followed by drowsiness, nausea, and vomiting. An overdose may result in convulsions, coma, and death. Tolerance develops rapidly and dependence is likely. Using contaminated syringes to inject such drugs may result in AIDS.

Tobacco/Nicotine - some tens of thousands of people in the United States die each year from smoking-related coronary heart disease. Some 30% of the cancer deaths each year are linked to smoking. Lung, larynx, esophagus, bladder, pancreas and kidney cancers strike smokers at increased rates. Emphysema and chronic bronchitis are ten times more likely among smokers.

Approved: August 1996
Revised: October 2005
Revised: July 2009

Oklahoma State University Policy and Procedures

EQUAL OPPORTUNITY/AFFIRMATIVE ACTION

**1-0101
GENERAL UNIVERSITY
MAY 2004**

POLICY

It is the policy of the Oklahoma State University:

1.01 to be a complete equal opportunity University in all phases of operations, toward the end of attaining the University's basic mission and goals.

1.02 to provide equal employment and/or educational opportunity on the basis of merit and without discrimination because of age, race, ethnicity, color, sex, religion, national origin, sexual orientation, veterans' status, or qualified disability.

1.03 to subscribe to the fullest extent to the principle of the dignity of all persons and their labors; in support of this principle, sexual harassment is condemned in the recruitment, appointment, and advancement of employees and in the evaluation of students' academic performance.

1.04 to apply equal opportunity in the recruitment, hiring, placement, training, promotion, and termination of all employees; and to all personnel actions such as compensation, education, tuition assistance, and social and recreational programs. The University shall consistently and aggressively monitor these areas to ensure that any differences which may exist are the results of bona fide qualification factors other than age, race, ethnicity, color, sex, religion, national origin, sexual orientation, veterans' status, or qualified disability.

1.05 to ensure that each applicant who is offered employment at the University shall have been selected on the basis of qualification, merit, and professional ability.

1.06 to provide and to promote equal educational opportunity to students in all phases of the academic program and in all phases of the student life program; and shall consistently and aggressively monitor these areas to ensure that any differences which may exist are the results of bona fide factors other than age, race, ethnicity, color, sex, religion, national origin, sexual orientation, veterans' status, or qualified disability.

PROCEDURE

2.01 The University has a written affirmative action program to implement its official policies of equal opportunity employment. Statements are published regularly as to the official stance of the University in regard to discrimination and equal opportunity employment. It is the continuing policy of the University to actively and aggressively locate, recruit, place, upgrade, and promote members of ethnic minority groups and women at all levels at the University.

2.02 The responsibility for the recruitment of faculty shall continue to be delegated to the Provost and Senior Vice President in conjunction with the deans of the colleges. The responsibility for the recruitment of administrative and professional staff shall continue to be delegated to the appropriate vice president in conjunction with the deans and directors within the colleges or other subdivisions of the University. The responsibility for the recruitment of classified staff shall be delegated to the Office of Human Resources in conjunction with the deans and directors within the colleges or other budgetary subdivisions of the University. It shall be the responsibility of the Office of Human Resources to refer to supervisors the names of candidates who are qualified. It shall further be the responsibility of the Office of Human Resources to list all vacancies with the Clearinghouse and the Oklahoma State News and to disseminate job information for posting on designated bulletin boards on the campus.

2.03 A Recruitment Report Form that accompanies Payroll Action Forms for University personnel is used to implement the University's plan for affirmative action in regard to equal opportunity employment. This form indicates the number of persons considered for employment, their race and sex, and the reasons why the person selected was offered employment. These reports, tabulated on a regular basis, are reviewed by the Affirmative Action Office and the appropriate administrators.

2.04 Each of the three campuses of the University has a person or persons to work with the Director of Affirmative Action in fulfilling the equal opportunity responsibilities in his/her designated subdivision. On the main campus, these subdivisions consist of the seven colleges and the four vice presidents' areas of responsibility.

2.05 The University is served by a Diversity Board comprised of faculty, staff members, and students. This Board serves in an advisory capacity to the Director of Affirmative Action and the Vice President for Institutional Diversity.

2.06 The University is served by a Committee for Campus Accessibility, comprised of designated administrators, staff members, and disabled students who work with the Director of Affirmative Action in the removal of barriers for the disabled.

2.07 As time and events progress, it will be necessary to reevaluate, revise, and otherwise alter the basic plan for affirmative action. In any such alteration that may come in the future, it shall be the continued objective of the University to strive toward a program of complete equal opportunity.

Original Date: January 7, 1970--Office of the President

Revised Date: December, 1976--Office of Affirmative Action

Revised Date: September 1, 1977--Office of Affirmative Action

Revised Date: May 1, 1981--Office of Affirmative Action

Revised Date: May 5, 2004 – Office of the President