



Northern Illinois University

Your Future. Our Focus.

AFFIRMATIVE ACTION & EQUAL OPPORTUNITY

2023-2024 Affirmative Action Plan

Presented By: Alan Clay, Director, Affirmative Action & Equal Opportunity

Key Concepts



- **Equal Opportunity**
- **Equal Employment Opportunity (i.e. [EO 11246](#))**
- **Affirmative Action**
 - **Office of Federal Contracts and Compliance Programs ([OFCCP](#))**

Affirmative Action Program VS. Affirmative Action Plan



- **Affirmative Action Program:**

- Comprehensive management system designed to detail and guide a federal contractor's positive steps to ensure equal employment opportunity [41 CFR 60-2.10\(a\)](#)
 - Recruitment and Hiring, Personnel Decision Process Review and Documentation
 - Compensation Analysis
 - Action-oriented programs ensuring equal opportunity at NIU

- **Affirmative Action Plan (AAP):**

- Adverse Impact Analysis
- **NIU AAP year: Nov. 1 – Oct. 31**
- **Updated annually** to provide a report on **good faith efforts** to ensure equal employment opportunity.

Affirmative Action Plan



AAP Narratives

- The written AAP consists of 3 narratives:
 - **Females and Minorities**
 - [Executive Order 11246](#)
 - Individuals with Disabilities
 - [Section 503](#)
 - Protected Veterans
 - [VEVRAA](#)

Affirmative Action Plan



Narrative Requirements: Females and Minorities

- [Workforce Analysis](#)
- [Job Group Analysis](#)
- [Incumbency vs. Availability Analysis](#)
- [Placement Goals](#)

Organizational Profile

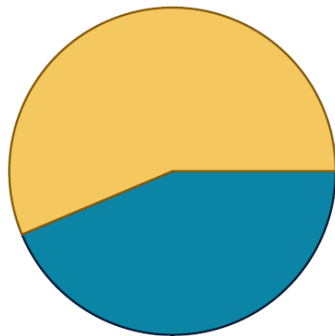


AAP Assessment

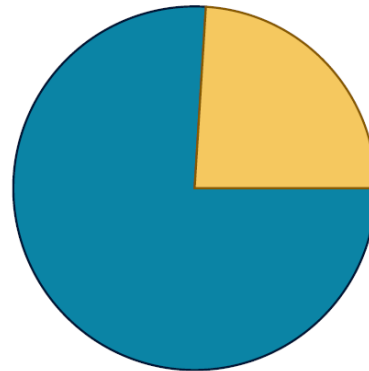
Analysis as of 11/01/2023

NORTHERN ILLINOIS UNIVERSITY

Job Group Summary



Gender



Race

Total		3,615	
Male	1,579	43.68%	
Female	2,036	56.32%	
Non-binary	0	0.00%	
Unknown Gender	0	0.00%	
<hr/>			
White	2,747	75.99%	
Minority	868	24.01%	
Unknown Race	0	0.00%	

Incumbency vs. Availability



- Arguably the most Important AAP Report
- **Incumbency**
 - Number of total incumbents in a job group
- **Availability**
 - Percentage estimate of qualified minorities and women for employment in a given job group within the recruitment area (i.e. **external availability**) and within the organization (i.e. **internal availability**)

NIU Recruitment Areas



job group
5E - OFFICE CLERKS
5F - OFFICE SUPPORT ASSOCIATE
5G - OFFICE SUPPORT SPECIALIST
5H - RECORDS
5J - STORES/INVENTORY
6A - SKILLED TRADES
6B - SKILLED TRADES SUPERVISOR
7A - OPERATIVES
8A - LABORERS & HELPERS
9A - BUILDING SERVICES
9B - BUILDING SERVICES EXTRA HELP
9C - BUILDING SERVICES SUPERVISOR
9D - FOOD SERVICE
9E - FOOD SERVICE EXTRA HELP
9F - FOOD SERVICE SUPERVISOR
9G - LABORATORY SERVICES EXTRA HELP
9H - SECURITY SERVICES
9J - SERVICE MAINTENANCE
9K - SERVICE MAINTENANCE SUPERVISORS
9L - SERVICES

Census Aggregations

Census Areas

Area: [NIU Custom MSA](#)
Weighted: [No](#)

Description

[Boone County, IL](#)

[Cook County, IL](#)

[DeKalb County, IL](#)

[DuPage County, IL](#)

[Kane County, IL](#)

[Kendall County, IL](#)

[Lake County, IL](#)

[McHenry County, IL](#)

[Ogle County, IL](#)

[Will County, IL](#)

[Winnebago County, IL](#)

Your Future. Our Focus.

NIU Recruitment Areas cont.



- All Faculty, SPS, and other Civil Service job groups not shown in the previous slide
- 100% United States
- Survey of Earned Doctorates (SEDs) – 100% United States

Incumbency vs. Availability cont.



- 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 particular job group (**i.e. underutilization**), a **placement goal** is established for the job group.

Placement Goals



- Serve as objectives or targets that are reasonably attainable by making every good faith effort to make all aspects of the entire affirmative action program work.
- Used to measure progress toward achieving equal employment opportunity.
- **Do not represent a finding nor an admission of discrimination. They also do not result in financial repercussions.**

Job Group has a placement goal, Now what?



- The OFCCP expects NIU to perform meaningful diversity outreach, recruitment and other **Good Faith Efforts (GFEs)** to attract and promote more qualified women and minorities from their respective availability pools
- The department should work with AAEO to strategize and develop [GFEs and action-oriented programs](#) and steps to attract and promote more qualified women and minorities

Examples of Good Faith Efforts



- Attend job fairs focused on jobs specific or related to the department
- Offer internships to students studying fields of the department's jobs.
- Develop and mentor women and minorities in the department's job areas
- Recruit minorities and women from surrounding community colleges within the custom MSA
- Send job openings to minority and women centric publications, job boards, newspapers, etc.
- Provide outreach opportunities for minority and women who work in the fields of the job group
- Volunteer with job group-related associations and programs for minorities and women.

What if NIU did not meet Placement Goal again?



- The OFFCP require federal contractors to report progress, or lack thereof, in attaining job goals.
- **If a Placement Goal is unmet, the federal contractor must document both GFEs and reasons for their failure to reach the target.**

Adverse Impact



- Defined as a substantially different rate of selection in hiring, promotion, or other employment decision which works to the disadvantage of members of a race, sex, or ethnic group
- **NIU's responsibility per the regulations is to find out what happened and make sure the decisions are not discriminatory**
 - **All findings must be documented**

Adverse Impact



- While we are required to set placement goals for Females and Minorities, for compensation and Adverse Impact purposes, the OFCCP is looking for disparity for **ANY race** or **EITHER sex**
 - Ex. We may see that we have a disparity for whites or for males

Adverse Impact



Action items to investigate Adverse Impact indicators

- **Hires**
- **Promotions**
- **Terminations**

NIU Requirements



- Must have an AAP annually [41 CFR 60-2.1\(c\)](#)
- Must communicate to leadership and individuals who make employment decisions on AA/EEO policies and practices annually [41 CFR 60-2.17\(d\)](#)
- Must post every position with the state employment office (i.e. IDES) with these exceptions:
 - Jobs that last fewer than 3 days
 - Jobs that are to be filled internally
 - Jobs that are executive level

NIU Requirements



- Must make and document good faith efforts to recruit and retain 3 key groups, **even when there are no placement goals**
- Must research and document areas where adverse impact occurs and placement goals are established
- Must have an approved AA/EEO tagline on every position that is posted and purchase orders and contracts

NIU Requirements



- **Record Retention ([41 CFR 60-1.12](#))**
 - Must maintain proper records as they relate to employment decisions. Examples include:
 - Interview questions
 - Evaluation/Assessment criteria and forms
 - Proofs/Copies/Screenshots of all advertisements
 - Itineraries/schedules of interviews
 - All notes **used or factored** in the actual selection or decision-making process

Affirmative Action Summary



- Aims to eliminate discrimination in any and every form
- Does not require an organization 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
- Uses statistical analyses, data, and reports to highlight where organizations are underutilized in the employment of available and qualified minorities and women
- Emphasizes that GFEs and action-oriented programs be developed and implemented to recruit available and qualified minorities and women

Affirmative Action Summary cont.



- Suggests that when organizations develop robust and pragmatic systems and processes to address the goals and areas of concerns that AAPs highlight, that available and qualified minorities and women **over time** will be hired and promoted that will eventually eliminate goals and potential adverse impact areas (i.e. achieve equal opportunity)

Thank you!/Questions?



- *“We seek not just freedom but **opportunity**. We seek not just legal equity but **human ability**, not just equality as a right and a theory but equality as a **fact** and equality as a **result**.”*
 - President Lyndon B. Johnson at Howard University Commencement Ceremony, 1965