



WILLIAM & MARY

CHARTERED 1693

**AFFIRMATIVE ACTION PLAN
FOR MINORITIES AND
FEMALES**

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This document is available in alternative formats upon request.

AAP FOR MINORITIES AND FEMALES

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I. Equal Opportunity/Affirmative Action Policy Statement

**COLLEGE OF WILLIAM & MARY
EQUAL OPPORTUNITY/AFFIRMATIVE ACTION POLICY STATEMENT**

William & Mary, including the Virginia Institute of Marine Science (the university), is firmly committed to compliance with all laws that require equal opportunity or affirmative action and that prohibit employment discrimination on the basis of age, sex/gender, race, color, sexual orientation, national origin, religion, disability, protected veteran status and other characteristic or classification (Equal Opportunity Laws). The university's Policy on Discrimination, Harassment, and Retaliation prohibits discrimination or harassment on the basis of any irrelevant personal factor and requires that employment decisions and actions be based on qualifications or performance related to job requirements. The university's commitment to equal opportunity applies to all personnel actions including, but not limited to, recruiting, hiring, training, promotions, pay practices, benefits, disciplinary actions and terminations. W&M also modifies the application process as well as the jobs, work conditions and work environment for qualified employees with disabilities as required by law, under the Employee Reasonable Accommodation Policy and Procedure.

William & Mary applicants and employees may not be subjected to harassment, intimidation, threats, coercion, or discrimination because they have engaged in any of the following activities: (1) filing a complaint, (2) assisting or participating in an investigation, compliance evaluation, hearing, or any other activity relating to the administration of any Equal Opportunity Law, or (3) exercising any other right protected by Equal Opportunity Law.

The university has written affirmative action programs. These programs set forth the policies, practices, and procedures, including the audit and reporting system, followed to ensure equal opportunity and affirmative action, and assign responsibility for implementing program activities. The written programs are available for inspection by any employee or applicant for employment upon request.

The university invites employees who are disabled or protected veterans and wish to be included under our Affirmative Action Program to self-identify with the Office of Diversity & Inclusion. This self-identification is strictly voluntary and confidential and will not result in adverse consequences of any sort.

W. Taylor Reveley, III
President

II. Introduction: Affirmative Action, Equal Opportunity/Equity, and Diversity at William & Mary

William & Mary, a “public ivy,” is a public university located in Williamsburg, Virginia. The second oldest university in the United States, William & Mary’s campus community includes over 8,000 students participating in over 30 undergraduate and 10 graduate programs. The university employs over 600 full-time faculty and 2000 employees.

William & Mary is committed to affirmative action, equal opportunity/equity, and diversity. The university strives to create a community of dignity and respect, where

- all students and employees are valued,
- minorities, women, and other protected classes are encouraged in employment,
- diversity is embraced,
- disabilities are accommodated,
- harassment is prohibited, and
- personnel actions are equitable and non-discriminatory.

Affirmative action, equal opportunity/equity, and diversity collectively refer to university activities, programs, and policies that seek to: prevent discrimination and harassment; increase the representation of minorities, women and other under-represented groups in appropriate areas; create a welcoming and inclusive environment for all; detect and remedy discrimination and harassment; accommodate employees and applicants with disabilities and provide an accessible campus for all; ensure non-discrimination and equal opportunity in all personnel actions, such as performance management; and otherwise create and maintain an equitable, inclusive workplace.

The university has established offices, committees, policies and procedures, education and awareness programs, and auditing and reporting systems to implement its commitment to affirmative action, equal opportunity/equity, and diversity. Key actions and institutional structures include:

- A Code of Ethics and a Diversity Statement, issued by the Board of Visitors and posted on the university’s website, that articulate the commitment to diversity and the rejection of discrimination and harassment.
- A Strategic Plan that includes, as one of its seven challenges, to “build and support a more fully diverse W&M community.”
- Establishment by the President of task forces to identify and recommend improvements relating to sexual harassment and misconduct, and race and race relations. These task forces issued recommendations in Fall 2015 and Summer 2016; implementation teams are working to prioritize and operationalize these recommendations.
- Establishment and maintenance of policies and procedures for accommodating

disabilities of faculty, students, and staff, which include mechanisms for people to appeal or grieve accommodation determinations.

- Establishment and maintenance of grievance and complaint procedures, allowing employees and applicants to raise concerns of discrimination, harassment or retaliation and to have those concerns fairly and effectively addressed.
- A commitment to remedying discrimination, harassment, and other barriers to equal opportunity.
- The production of organizational analyses described in Section V and establishment of placement goals and action-oriented programs for reaching such goals.
- The development by specific university units of Diversity Plans, which set goals and plans for increasing employment diversity.
- Robust hiring processes, guided by policies and practices designed to ensure fair and equitable applicant assessment and culminating in review and approval of faculty and certain other administration hires by the university's governing board.
- The action-oriented programs described in Section VI, and the auditing and reporting systems described in Section VII.
- Establishment of central offices with oversight responsibility for discrimination and harassment prevention, affirmative action, and employment-related diversity efforts: the Office of Diversity & Inclusion and the Office of Compliance & Equity. Appendix A provides an overview of the role of these and other offices in the university affirmative action, equal opportunity/equity, and diversity work.
- Mandated training for all faculty and staff on sexual harassment and sexual misconduct.

The Affirmative Action Programs (AAPs) required by federal law and regulation are part of William & Mary's affirmative action, equal opportunity/equity, and diversity efforts. In accordance with federal regulation, this Report documents key aspects of the AAP for women and minorities. The university also has an AAP for people with disabilities and covered veterans.

III. Establishment of Responsibilities for Implementation of the Affirmative Action Program (41 CFR 60-2.17(a))

The ultimate responsibility for the implementation of the university's AAPs rests with the President. Authority for implementation of the affirmative action program is delegated to the executive officers of the university and managers, as described below, with central coordination by the Chief Diversity Officer, Chief Compliance Officer, and Chief Human Resources Officer, advised by University Counsel:

The Chief Diversity Officer is responsible for the following aspects of William & Mary's equal

opportunity and affirmative action programs:

1. Performing quantitative analyses of the university's organizational profile (workforce analysis), job groups, placement of incumbents in job groups, availability (demographic benchmarking data), incumbency as compared to availability, and placement goals.
2. In cooperation with the Chief Human Resources Officer, Chief Compliance Officer, and Provost, establishing plans for reaching these placement goals.
3. Working with the Chief Compliance Officer, Chief Human Resources Officer, and Provost to identify problems areas.
4. In cooperation with the Provost and Chief Human Resources Officer, assisting in efforts to recruit diverse faculty and staff.
5. Monitoring faculty and staff recruitment and hiring actions.
6. In cooperation with the Chief Compliance Officer and Chief Human Resources Officer, providing information and/or training to search committees on promoting affirmative action in searches and hires.
7. Coordinating efforts to create and maintain a welcoming and inclusive workplace including through educational and cultural programming.
8. Coordinating responses to requests by individual employees and applicants for disability and religious accommodations in accordance with applicable procedure.
9. Chair of the university's Implementation Committee, charged with oversight of implementation of the Race and Race Relations Task Force's recommendations.
10. Ensuring that Diversity Plans are informed by and help implement the affirmative action programs.
11. Inviting applicants and employees with disabilities or who are veterans to self-identify in accordance with OFCCP regulations.
12. In cooperation with the Chief Human Resources Officer, Chief Compliance Officer, , and Provost, and in consultation with University Counsel, designing and implementing an internal audit system that:
 - a. Measures the effectiveness of William & Mary's program;
 - b. Determines the degree to which AAP goals and objectives are met; and
 - c. Identifies the need for improvements.
13. In cooperation with the Chief Compliance Officer, designing and implementing a reporting system that:
 - a. Disseminates the AAPs to senior management
 - b. Creates awareness of equal opportunity and affirmative action progress and

concerns

- c. Ensures that Diversity Plan are informed by and inform the AAPs, including by helping to achieve placement goals
- d. Promote awareness of AAP elements among management and promote compliance with relevant policies and procedures
- e. Collaborate with senior management in developing solutions to identified problem areas.

The Chief Compliance Officer is responsible for the following aspects of William & Mary's equal opportunity and affirmative action programs:

1. Developing and maintaining relevant policies and policy statements.
2. Disseminating relevant policies and policy statements, including through posting on bulletin boards.
3. Ensuring adequate mechanisms for employees and applicants to file grievances and complaints of discrimination (including harassment and retaliation).
4. Coordinating training and other education and awareness programs to help ensure university faculty and staff are aware of university policies, procedures, and resources relating to discrimination and the affirmative action programs.
5. Working with the Chief Human Resources Officer and Provost to ensure that university policies and procedures governing all personnel actions help prevent discrimination and promote equal opportunity and affirmative action, including
 - a. Recruitment and hiring
 - b. Performance management Discipline
 - c. Termination/layoff/separation, including position abolishment
 - d. Leaves of absence, sick leave, and other leave
 - e. Other benefits
 - f. Job classification
 - g. Transfer and reassignment.
6. Working with the Chief Diversity Officer and Chief Human Resources Officer, and advised by University Counsel, to produce the written affirmative action programs.
7. In cooperation with the Chief Diversity Officer, Chief Human Resources Officer, and Provost, and in consultation with University Counsel, identifying problem areas in compensation, termination, hiring, or any other type of personnel activity.
8. Acting as the university's Title IX Coordinator, responsible for overseeing all elements

of the university's compliance with federal law preventing discrimination on the basis of sex.

9. Responding to complaints and reports of discrimination, harassment or retaliation brought by students, employees, applicants, or third parties pursuant to university (as opposed to State) complaint procedures, including complaints and appeals relating to disability accommodations.
10. Responding to external complaints and audits, in consultation with University Counsel, and acting as liaison to federal enforcement agencies including the U.S. Departments of Labor and Education and the Equal Employment Opportunity
11. Acting as the university's Section 504 Coordinator, pursuant to 34 C.F.R. 104.7, coordinating the university's efforts to comply with Section 504 of the Rehabilitation Act of 1973, a federal law requiring equal opportunity for qualified individuals with a disability.
12. Acting as the university's ADA Coordinator, pursuant to 35 C.F.R. 107(a), coordinating the university's compliance with Section II of the Americans with Disabilities Act, a federal law prohibiting discrimination on the basis of disability by public entities (including public institutions of higher education) and requiring institutions to offer reasonable accommodations to qualified individuals with disabilities.
13. With the Chief Human Resources Officer and Chief Diversity Officer, identifying affirmative action/equal opportunity problems.
14. In cooperation with the Chief Human Resources Officer, Chief Diversity Officer, and Provost, and in consultation with University Counsel, designing and implementing the AAP internal audit system.
15. In cooperation with the Chief Diversity Officer, designing and implementing the AAP reporting system.

The Chief Human Resources Officer is responsible for the following aspects of William & Mary's equal opportunity and affirmative action programs:

1. Working with the Chief Compliance Officer, Chief Diversity Officer, and Provost to establish plans for reaching placement goals.
2. In cooperation with the Provost, monitoring compliance with university policies on performance management and compensation.
3. In cooperation with the Chief Compliance Officer, ensuring that policies and procedures governing all personnel actions help prevent discrimination and promote equal opportunity and affirmative action, including policies and procedures governing:
 - a. Performance management

- b. Recruitment and hiring
 - c. Discipline
 - d. Termination/layoff/separation, including position abolishment
 - e. Short- and Long-Term Disability Leave, leaves of absence, sick leave, and other leave
 - f. Other benefits
 - g. Job classification
 - h. Transfer and reassignment.
4. In cooperation with the Chief Diversity Officer and Chief Compliance Officer, providing training and other resources to supervisors and managers to ensure individual personnel actions are made in compliance with applicable personnel policies and procedures.
 5. Working with the Chief Compliance Officer, Chief Diversity Officer and Provost to identify problem areas in compensation, termination, hiring, or any other type of personnel activity.
 6. Ensuring that classified and operational employees are informed of their rights to access the state grievance systems, including complaining of discrimination, and that grievances are processed in accordance with such procedures.
 7. In cooperation with the Chief Compliance Officer, Provost and other members of management, taking appropriate steps to prevent and respond to reported retaliation and to remediate discrimination and harassment through enforcement of institutional policies.
 8. Auditing the contents of the university's bulletin boards to ensure compliance information is posted and up-to-date.

The Provost is responsible for the following aspects of William & Mary's equal opportunity and affirmative action programs:

1. Reviewing or making determinations regarding complaints/grievances of discrimination, harassment, or retaliation relating to faculty, staff, and students.
2. Working with the Chief Compliance Officer and Chief Human Resources Officer to ensure that university policies and procedures governing all personnel actions help prevent discrimination and promote equal opportunity and affirmative action, including policies and procedures governing:
 - a. Performance management
 - b. Recruitment and hiring

- c. Discipline
 - d. Termination/layoff/separation, including position abolishment
 - e. Short- and Long-Term Disability Leave, leaves of absence, sick leave, and other leave
 - f. Other benefits
 - g. Job classification
 - h. Transfer and reassignment.
3. Promoting awareness of relevant policies and procedures.
 4. Authorizing relevant policies and procedures, including grievance/complaint procedures designed to comply with EO Laws.
 5. With the Senior Vice President for Finance & Administration, providing resources to ensure effective implementation of the affirmative action programs, as required by 41C.F.R. 60-2.17.

The Senior Vice President for Finance & Administration is responsible for the following aspects of William & Mary's equal opportunity and affirmative action programs:

1. Ensuring that the equal opportunity clauses required by 41 C.F.R. 60-1.4(a) are included or incorporated by reference in all contracts and subcontracts.
2. Ensuring compliance with Virginia Code 2.2-4310 and Virginia Executive Order 20, "Advancing Equity for Small, Women, and Minority Owned Businesses," which prohibit discrimination in the soliciting or awarding of contracts because of sex, religion, color, sex, national origin, age, disability, status as a service disabled veteran, and require affirmative action programs relating to small businesses and businesses owned by women, minorities and service disabled veterans.
3. With the Provost, providing resources to ensure effective implementation of the affirmative action programs, as required by 41 C.F.R. 60-2.17.

University Counsel is responsible for the following aspects of William & Mary's equal opportunity and affirmative action programs:

1. Providing legal services to the Chief Diversity Officer, Chief Compliance Officer, and Chief Human Resources Officer in the production of the AAPs.
2. Providing legal services to the Chief Diversity Officer, Chief Compliance Officer, Chief Human Resources Officer, and Provost in the identification of problem areas in compensation, termination, hiring, or any other type of personnel activity.
3. Providing legal services to the Chief Compliance Officer in responding to external complaints and in acting as liaison to federal enforcement agencies, including the U.S.

Department of Labor and the Equal Employment Opportunity Commission. Where appropriate, represents William & Mary before those agencies and other tribunals.

Individual managers/senior leaders are directly responsible for the following aspects of William & Mary's equal opportunity and affirmative action programs:

1. Ensuring that position descriptions accurately reflect job duties and that job qualifications are valid and non-discriminatory.
2. Reviewing the job performance of each employee, in consultation with Human Resources, to assess whether personnel actions are justified based on the employee's performance of his or her duties and responsibilities.
3. Responding appropriately to concerns and grievances, in accordance with applicable procedures, and preventing and responding to reported retaliation.
4. Being familiar and complying with university discrimination policies, reporting/complaint procedures, and personnel (HR) policies and procedures including those relating to performance management and discipline.
5. Assisting in the identification of problem areas, formulate solutions, and establish departmental goals and objectives when appropriate and in accordance with the Affirmative Action Plans and Diversity Plans.
6. Complying with university policies and procedures to ensure qualified individuals are treated in a nondiscriminatory manner when hiring, promotion, transfer, and termination actions occur.

IV. University Analyses: Organizational Profile, Job Group Analysis, Placement of Incumbents in Job Groups, Availability Analysis, Comparing Incumbency to Availability, and Establishment of Placement Goals (41 CFR 60-2.11 – 2.16)

In compliance with OFCCP regulations, the university provides, in Appendix A, specific information and quantitative analyses:

- A. Organizational profile (60-2.11).** Organizational profiles are overviews of the workforce. These profiles are used by employers to determine whether barriers to equal employment opportunity exist – whether there are any units where women or minorities are underrepresented or concentrated. William & Mary provides a workforce analysis as its organizational profile. This is a listing of each job title as it appears from the payroll records ranked from the lowest to highest paid within each unit. For each job title, the following information is provided:
- the total number of male and female incumbents
 - the number of male and female incumbents within the groups Black, Hispanics, Asians/Pacific Islanders, and American Indians/Alaskan Natives

- the wage rate or salary range.

B. Job Group Analysis; Placement of Incumbents in Job Groups (60-2.12 and 2.13)
The university breaks its jobs into groups, collecting together jobs with similar duties and responsibilities and pay. In the job group analysis, each job title within each job group is listed. In addition, the percentage of minorities and the percentage of women in each job group are calculated.

C. Availability Analysis; Comparing Incumbency to Availability (60-2.14 and 2.15)
The availability analysis sets a benchmark as to what percentage of specific types of jobs that would be expected to be filled by women or minorities, based on availability in the job market. Availability is expressed as a percentage of all qualified persons available for employment. In determining availability, William & Mary must consider the relevant recruitment area (e.g., national versus regional) and the percentage of women or minorities among those promotable, transferable, or trainable within the university.

The university must use the most recent statistical information available.

This analysis also includes a comparison of incumbency to availability – comparison of the percentage of minorities and women in each job group to the availability for that job group. When there are fewer minorities or women (by percentage) in a job group, as compared to what would reasonably be expected given the availability (by percentage) the university establishes a placement goal for that job group.

D. Placement Goals (41 CFR 60.2-2.16) Placement Goals are set for job groups that have fewer minorities or women than expected, based on the availability analysis. By law, a Placement Goal is not a finding or admission of discrimination. A Placement Goal is a target or objective designed to be reasonable attainable through good faith efforts. The university also measures its progress towards equal employment by tracking its success in achieving Placement Goals.

- Placement Goals are not quotas, nor are they floors or ceilings for hiring.
- Placement Goals do not justify preferences based on sex, gender, race, or any other protected characteristic.
- Hiring remains based on merit, and Placement Goals do not require the university to hire an unqualified person or to hire a less-qualified person in preference for a more-qualified person.

V. Problem Areas (41 CFR 60-2.17(b))

William & Mary performs an in-depth analysis of its total employment process to determine if there are areas where minority and/or female groups may face impediments to equal opportunity. The following analyses are conducted in order to reveal any potential problem areas:

- A. Placement Goals:** An analysis of incumbency versus availability is performed to determine whether there are problems of minority or female utilization. As described in Section IV(D), Placement Goals are set for job groups with fewer minorities or women than expected. The university's Placement Goals as of May 31, 2016, are included in Appendix B.
- B. Review of Employment Decisions:** Review of employment decisions is made in order to determine whether any barriers to equal employment opportunity exist:
- **Hires and Promotions:** Review of new hire and, for faculty (the only category of position for which regular promotional opportunities exist), promotion, data, including applicant flow, to assess whether women and minorities are selected or promoted at a lower rate than men/non-minorities.
 - **Terminations:** Reviewing employee termination data to assess whether the university is applying its policies and procedures for termination in a non-discriminatory manner for protected as well as non-protected classes, and obtaining legal review from University Counsel on all planned terminations and layoffs.
 - **Compensation:** Reviewing faculty and staff compensation to assess whether the university is applying its policies and procedures for merit based compensation in a nondiscriminatory manner and equally for protected as well as non-protected classes.
- C. Investigation/Review of Grievance and Complaints:** The university conducts thorough, expert investigation of reported discrimination and harassment, to enforce university policy. Any violations detected are addressed through sanctions and remedies. The university also reviews information collected through such investigations and through informal reports and referrals to identity units, policy issues, and personnel actions that may be problem areas.

From our review of grievances and complaints, we have identified the areas in which improved or additional policies and greater awareness of the affirmative action program and EO policies could help improve campus climate including for female and minority employees. W&M is working to address these matters.

- D. Review of Policies and Procedures:** The university periodically reviews existing policies and procedures relating to all aspects of employment, to help ensure they promote equity and fair process and implement the university's commitment to non-discrimination and affirmative action. Significant new policies and revisions to existing policies and procedures are reviewed by the Office of Compliance & Equity to identify any negative impact on affirmative action or equal opportunity, pursuant to the university's Policy Program.

In addition, the action-oriented programs described in Section VI and the internal audit system described in Section VII may identify problem areas.

When problem areas are identified, the university takes steps such as increasing monitoring or developing new training programs to address concerns.

VI. The Development and Execution of Action-Oriented Programs (41 CFR 60-2.17(c))

Action programs have been instituted to eliminate identified problem areas and to help meet Placement Goals and achieve other equal opportunity/affirmative action goals. The results of these action-oriented programs in terms of achieving prior year Placement Goals are identified in Appendix B.

These ongoing programs include the following:

- A. Recruitment and Hiring.** University-wide, and particularly for hires in job groups that have Placement Goals, steps will be taken to encourage and increase the percentage of qualified females and/or minorities applying for positions both externally and internally. These ongoing steps may include, as appropriate, but are not limited to the following:
 1. Creation of a new faculty diversity recruitment initiative, beginning in 2016-17 with an investment of \$500,000 with a planned additional investment of \$500,000 in 2017-18 (for an annual recurring commitment of \$1,000,000);
 2. When appropriate, informing the hiring unit, hiring manager and/or search committee if a Placement Goal exists for the position, and providing guidance and support on conducting an inclusive search and selection process;
 3. Prior to filling a vacant, non-faculty position, reviewing the position description to ensure accuracy and relevance of qualifications; if there are significant changes, the Office of Human Resources will be review the revised description including to ensure appropriate compensation range and appropriate specifications and qualifications;
 4. For the creation of a new, non-faculty position, full review and approval of the position description and compensation by Human Resources, Finance & Budget, and administrators, to ensure appropriate specifications and qualifications;
 5. Maintenance of recruitment and hiring guides and other guidance for hiring officials and search committees;
 6. Providing training to search committees, covering all aspects of the hiring process including how to identify and avoid implicit bias;
 7. Monitoring by the Office of Diversity & Inclusion of faculty and executive employee search and selection processes, as described further in Section VII;

8. Placement of job advertisements in minority or women's interest news media or with organizations or listservs representing or serving minorities or women;
9. Posting positions online when a search will be conducted via the university's website and also on the state Department of Human Resources Management (DHRM) recruitment site along with other online professional network list serves;
10. Making job descriptions available to recruiting sources and available to all faculty and staff involved in the recruiting, screening, selection and promotion processes;
11. Including the tagline "*The College of William & Mary values diversity and invites applications from underrepresented groups who will enrich the research, teaching and service missions of the university. The University is an Equal Opportunity/Affirmative Action employer of women, minorities, persons with disabilities and protected veterans. The university conducts background checks on applicants for employment.*" in all employment advertisements; and
12. Ensuring that all employees are given equal opportunity for promotion, either through scheduled promotional opportunities, for faculty, or through application for a higher-ranking position, for staff. This is achieved by:
 - a. Considering qualified employees for promotional opportunities
 - b. Evaluating job requirements for promotion
 - c. Providing professional development and training opportunities
 - d. Adhering to formal, robust processes for promotion of faculty candidates, culminating in review and approval by the Board of Visitors.

B. Climate and Culture. William & Mary strives to create an inclusive environment free from discrimination and harassment. Some of the actions and programs the university uses to create and maintain this environment are:

1. Evaluation and assessment of the university's climate and culture, including through conducting anonymous employee (faculty and staff) surveys and through actions of various task forces and committees, including those listed in item 2 and including focus group surveys of staff in W&M's Facilities Management division in Fall 2016 focusing on race-related concerns.
2. Establishment of committees, working groups and task forces dealing with relevant issues:
 - a. The Task Force on Race and Race Relations, tasked with evaluating climate, considering (a) how a racially diverse faculty and senior administration may be recruited and retained, (b) what measures may be

taken to educate the campus regarding racial discrimination and to prevent it, and (c) how to report instances of racial prejudice for investigation and remediation. The Task Force issued its final report in March, 2016. The Task Force's recommendations are being prioritized and coordinated by an Implementation Committee, chaired by the Chief Diversity Officer.

- b. The Task Force on Preventing Sexual Assault and Harassment, which was charged in 2014 and issued its final report on June 30, 2015. The Task Force had a subcommittee on climate, which collected data regarding the culture of the campus community as relating to sex-based discrimination. The Task Force's work is being continued by a coordinating committee, which works with the Title IX Coordinator to implement Task Force recommendations.
 - c. A LGBTQ Working Group convened and issued its report in 2016, making recommendations to guide inclusion.
3. Creation and promotion of policies articulating the university's expectations, including prohibitions on discrimination, harassment, and retaliation, and helping ensure that these expectations are met. The university is currently updating and improving its policies under which staff (non-faculty employees) are classified and compensated. Among other improvements, these updates will more closely align employees' official employment classification (categories) with Affirmative Action job groups.
4. Fostering awareness of diversity, affirmative action, and equity issues, developments, and programs, including through:
 - a. Hosting and promoting events and programs for faculty and staff, such as brownbag lunch seminars on relevant topics
 - b. Providing Innovative Diversity Efforts Awards, grants available to faculty, students, staff and organizations to fund diversity-related projects.
 - c. Publication of a bi-monthly online newsletter, Voices, updating the community on diversity efforts
 - d. Periodic notices in the university's daily e-bulletin, The W&M Digest
 - e. Maintenance of robust websites providing policies, guidance, and information to all members of the campus community.
5. Training and educational opportunities for faculty and staff, including mandated training on sexual harassment and sexual misconduct.

6. Providing multiple, effective ways for faculty and staff to raise concerns or complaints of barriers to equal opportunity, through grievance and complaint mechanisms, and providing prompt, expert review and investigation.
7. Providing an ombudsperson to provide confidential support to faculty and staff with workplace concerns.

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

Through auditing and internal reporting system, the university's affirmative action, equal opportunity and diversity program can be monitored for effectiveness, and management can be kept informed.

A. Auditing System. William & Mary's audit and reporting system is designed to:

1. Measure the effectiveness of the AAPs;
2. Document personnel activities;
3. Identify problem areas where remedial action is needed; and
4. Determine the degree to which William & Mary's AAP goals and objectives have been attained.

The university's auditing system consists of:

1. The processes used to identify problem areas, described in Section III.
2. Review, guidance and monitoring by the Office of Diversity & Inclusion of the recruitment and hiring process for each faculty and executive position, including training of search committees, review of short lists, and review of search and selection plans. This review and monitoring helps guard against discrimination or bias and enhance the diversity of relevant job groups.
3. For operational and professional positions), each year search processes are randomly selected by the Office of Diversity & Inclusion to track applicant flow and to determine if process was fair and impartial. This audit will be completed by:
 - Reviewing job applications and other pre-employment forms to ensure information requested is job-related;
 - Evaluating selection methods that may have a disparate impact to ensure that they are job-related and consistent with business necessity; and
 - Assessing the effectiveness of the total selection process for freedom from bias.
4. Maintenance of the following documents relating to recruitment, hiring, promotion, and salary actions, as a component of William & Mary's internal

audit process:

- For each position, classification and compensation data including data regarding pay increases
- For each position, employment applicants and applicant flow data
- For faculty positions, records of promotion cases
- Summary data of external job offers and hires, promotions, resignations, terminations.

B. Reporting System. The reporting system is actions taken to promote internal awareness of the affirmative action program, and thereby help implement the program elements, achieve Placement Goals, and address problem areas. Internal reporting includes:

1. Annual reports by the Chief Diversity Officer and/or Chief Compliance Officer on the Affirmative Action Program and Placement Goals to:
 - Senior management
 - Deans and Vice Provosts
 - The Board of Visitors and
 - Other interested campus groups and entities.
2. Review of the AAPs and relevant Placement Goals with units for which a Placement Goal exists.
3. Regular reports by the Chief Compliance Officer to the Audit & Compliance Committee of the Board of Visitors regarding equal opportunity issues and problems, including internal and external grievances, complaints, and investigations.
4. Briefings by the Chief Diversity Officer and/or Chief Compliance Officer to management regarding diversity, affirmative action, or equal opportunity concerns or issues.

APPENDIX A

[http://www.wm.edu/offices/compliance/ documents/DiscriminationInfrastructure.pdf](http://www.wm.edu/offices/compliance/documents/DiscriminationInfrastructure.pdf)

APPENDIX B

Available upon request from the Office of Diversity & Inclusion