AFFIRMATIVE ACTION PROGRAM

FOR

MINORITIES AND WOMEN

Company: Midwestern University

Address: 555 - 31st Street
Downers Grove, IL 60515

EEO Coordinator: Angela Marty, Director of Human Resources

President/Chief Executive Officer: Kathleen H. Goeppinger, Ph.D.
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SECTION I
CONFIDENTIAL TRADE SECRET MATERIALS

This Affirmative Action Program contains confidential information which is subject to the provision of 18 U.S.C. 1905. Chrysler Corp. v. Brown. 441 U.S. 281, 19 FEP 475 (1979). Copies of this Affirmative Action Program and all related appendices, documents, and support data will be made available on loan to the U.S. Government upon the request of said Government on the condition that the Government hold them totally confidential and not release copies to any persons whatsoever. This Affirmative Action Program and its appendices and other supporting documents contain much confidential information which may reveal, directly or indirectly, Midwestern University's plans for business or geographical expansion or contraction. Midwestern University considers this Affirmative Action Program to be exempt from disclosure, reproduction and distribution under the Freedom of Information Act upon the grounds, among others, that such material constitutes (1) personnel files, the disclosure of which would constitute a clearly unwarranted invasion of personal privacy, which are exempt from disclosure under 5 U.S.C. 552(b) (6); (2) confidential, commercial or financial information, which is exempt from disclosure under 5 U.S.C. 552(b) (4); (3) investigatory records compiled for law enforcement purposes, the production of which would constitute an unwarranted invasion of personal privacy, which are exempt from disclosure under 5 U.S.C. 552(b) (7) (C); and as (4) matters specifically exempted from disclosure by statute, which are exempt from disclosure under 5 U.S.C. 552(b) (3). Notice is hereby given of a request pursuant to 41 C.F.R. 60-60.4(d) that portion of this Program be kept confidential.

Thus, Midwestern University wishes to make it clear that it does not consent to the release of any information whatsoever contained in this Affirmative Action Program under the Freedom of Information Act or otherwise. If the U.S. Government, or any agency or subdivision thereof, is considering breaching the conditions under which this Affirmative Action Program was loaned to such government, or is considering a request of this Program under the Freedom of Information Act, request is hereby made that the Government immediately notify the President of parent corporation of Midwestern University and its counsel of any and all Freedom of Information Act requests by the government or any other contemplated release of this Program by the Government which relates to information obtained by the Government.

Midwestern University further requests that everyone who has any contact with this Affirmative Action Program, or its supporting appendices, documents, and other data, treat such information as totally confidential and that such information not be released to any person whatsoever. Retention or disclosure of information relating to identifiable individuals may also violate the Privacy Act of 1974.
SECTION II
INTRODUCTION

Midwestern University is a health care professional university dedicated to the training of pharmacists, physician assistants, physical and occupational therapists and osteopathic doctors. MWU has developed this Affirmative Action Plan as one of several tools to implement our affirmative action policies effectively. However, the form, language and analysis of the plan necessarily complies with the requirements of 41 CFR 6-2.1, et seq. (Revised Order No. 4), and other regulations established pursuant to the provisions of Executive Order 11246, the Civil Rights Acts of 1964 & 1991, the Age Discrimination Act of 1975, the Vietnam Era Veterans Readjustment Act of 1974, the Rehabilitation Act of 1973 as amended by the Civil Rights Restoration Act of 1987, the Americans with Disabilities Act of 1990, the Immigration Reform and Control Act of 1986, the Family and Medical Leave Act of 1993, the Uniform Guidelines on Employee Selection Procedures of 1978, the Fair Labor Standards Act of 1936, the Equal Pay Act of 1986, and all other civil rights related laws and regulations that has or may be enacted as amended.

Accordingly, terminology such as "problem areas" and "utilization analysis," appearing in this Affirmative Action Plan is that which our organization is required to use by these regulations. The criteria used in relation to these terms are those specified by the U.S. Government. These terms have no independent legal or factual significance whatsoever. Although MWU has used this terminology and methodology in connection with this Affirmative Action Plan and our affirmative action policies, such usage does not necessarily signify that our organization agrees that these terms are properly applied to any particular factual situation.

Information regarding identifiable individuals is private and confidentially maintained. Everyone who has official access to confidential data will exercise every precaution to protect this information.
SECTION III
EQUAL EMPLOYMENT OPPORTUNITY POLICY
41 C.F.R. Section 60-1.4; 60-2.13(a)

To: All Faculty and Staff

From: Kathleen H. Goeppinger, Ph. D.
      President/Chief Executive Officer

As a part of our commitment to providing equal opportunity to all persons, MWU has made a commitment to equal employment opportunity through a positive and continuing Affirmative Action Program. No faculty/staff or applicant for employment will be discriminated against because of race, color, religion, sex, national origin, age, otherwise qualified disabled or veteran status.

To implement these policies, MWU will continue to:

A. Recruit, hire train and promote persons in all job classifications without regard to race, color, religion, sex, national origin, age, otherwise qualified disabled or veteran status. MWU does not discriminate on the basis of national origin or citizenship status as provided under the Immigration Reform and Control Act of 1986;

B. Base decisions on employment so as to further the principle of equal employment opportunity;

C. Insure that promotion decisions are in accord with the principles of equal employment opportunity by imposing only valid requirements for promotional opportunities;

D. Insure that all personnel actions (including but not limited to compensation, benefits, transfers, layoffs, return from layoffs, company-sponsored training, education, tuition assistance, social and recreational programs) are administered without regard to race, color, religion, sex, national origin, age, otherwise qualified disabled or veteran status.

Angela Marty, Director, Human Resources has been designated EEO Coordinator and is responsible for compliance with state and federal equal employment opportunity laws, and for implementing the affirmative action program, including equal employment practices, monitoring, and internal reporting. Anyone believing they have not been treated in accord with this policy are encouraged to contact Angela Marty.

The continued success of our Affirmative Action Program requires maximum cooperation from every individual throughout our organization. Equal employment opportunity is not only the law, but it is a principle of MWU. I appreciate your cooperation. I know we will meet this goal if we continue to promote our quality institution.
MWU is well aware of the importance of faculty and staff participation in the affirmative action plan. In order to facilitate the successful implementation of the plan, the following internal measures will be taken:

1. The EEO policy statement will be posted on the Human Resource bulletin board. This notice will state the name of the EEO Coordinator, and to whom questions, comments, or complaints should be directed. All required state and federal EEO notices are also posted on bulletin boards.

2. Notice of Affirmative Action Plan. MWU's affirmative action plan is available in the office of the EEO Coordinator for review.

3. Advertising/Publications. When faculty and staff are featured in advertising or other publications, both minority and non-minority male and female individuals will be featured as appropriate.

4. Training Programs. Educational and training programs may be offered to assist in the personal development, as well as to increase skills and ability to perform the job. MWU will continue to ensure that all faculty and staff have the opportunity to participate in such programs without regard to race, color, national origin, sex, religion, age, disabled, or veterans status.

5. The affirmative action program is explained in new hire orientations and management training programs.
EXTERNAL DISSEMINATION
41 C.F.R. Section 60-2.13(b); 60-2.21(b)

To assure proper external dissemination of MWU's EEO Policy, the following activities will be undertaken:

1. Recruitment Sources. All appropriate recruitment sources will be notified of the University's commitment to equal employment opportunity and affirmative action.

2. Advertisements. All advertisements seeking applicants for employment will identify MWU as an "equal opportunity employer."

3. Applicants. Application forms state MWU's commitment to equal employment opportunity. Notices to recruitment sources and all employment advertisements state this EEO policy.

4. Contractual Instruments. MWU will incorporate the Equal Opportunity Clause in its purchase orders, leases and contracts as required by Executive Order 11246 as amended and its implementing regulations. All suppliers and subcontractors will be requested to comply with their affirmative action requirements.
Kathleen H. Goeppinger, Ph.D., President & CEO, has overall responsibility for implementation of the Equal Employment Opportunity Policy.

Angela Marty, Equal Employment Opportunity Coordinator, has assumed the responsibility for the development, implementation and monitoring of the Affirmative Action Plan, to include all locations in Illinois and Arizona for which the selection decisions are made at the corporate level.

RESPONSIBILITIES OF THE EEO COORDINATOR
41 C.F.R. Section 60-22.22(b) (1-9)

Responsibility for the implementation and monitoring of the affirmative action plan shall rest with the EEO Coordinator, whose responsibilities include but are not limited to the following:

1. Developing the policy statements and affirmative action programs.

2. Developing internal and external communication procedures, as appropriate.

3. Monitoring the following internal practices:
   a. Proper display of EEO posters and policies.
   b. Full participation of minority, female, and disabled individuals in all MWU sponsored educational, training, recreational, and social activities.

4. Assisting management in solving any identified problems. It shall be the responsibility of department heads, managers, and supervisors to provide the EEO Coordinator with such information to assure good faith efforts to implement the Affirmative Action Plan.

5. Assisting faculty and staff in solving problems and resolving EEO complaints.

6. Serving as a liaison between MWU and appropriate women and minority groups.

7. Serving as a liaison between MWU and appropriate EEO enforcement agencies.

8. Participating in and/or supporting local minority organizations, women's organizations, community action groups and community service programs.

9. Sharing EEO-1 reports with the Board as requested.
DEAN/DEPARTMENT HEAD RESPONSIBILITY
41 C.F.R. Section 60-22.22(a) (8-9)

All managers and supervisors including all those located in Illinois and Arizona for which the selection decisions are made at the corporate level, shall have the following responsibilities:

1. Assisting in the identification of problem areas and establishment of good faith goals and objectives for their areas of responsibility.

2. Taking appropriate disciplinary actions for violations of the EEO policy or affirmative action plan, and taking steps to prevent illegal harassment.

3. Making all staffing decisions, including hiring, promotion, transfer, and termination, without regard to race, color, national origin, sex, age, religion, disabled, or veterans status.

4. Being aware and/or involved in our community.

5. Making available career counseling.

6. Annual reviews to ensure that their areas of responsibility are in compliance with:
   a. Required posters being properly displayed;
   b. Insuring that all faculty and staff regardless of race or sex are afforded a full opportunity to participate in any University sponsored educational, training, recreational, and social activities.
SECTION VI
INTERNAL AUDIT AND REPORTING
41 C.F.R. Section 60-2.13(g); 60-2.25 (a-d)

Specific monitoring and reporting procedures have been developed to evaluate the extent to which the goals of the Affirmative Action Plan are being met. MWU maintains the following data:

1. Any training programs will be analyzed regularly to eliminate potential discrimination in participation rates.
2. The wage and salary plan will be reviewed at least annually for wage discrepancies.
3. Subcontractors will be required to certify their compliance with mandates of E.O. 11246.
4. Top management is informed on a regular basis of the effectiveness of these policies and any recommendations for improvement.

SECTION VII
SUPPORT OF COMMUNITY ACTION PROGRAMS
41 C.F.R. Section 60-2.13(i); 60-2.26 (a-f)

MWU supports local and national community action programs and community service programs designed to improve the employment opportunities of minorities and women. Management is encouraged to serve on merit employment councils, community relations boards, and similar organizations.
SECTION VIII
DEVELOPMENT AND EXECUTION OF ACTION ORIENTED PROGRAMS
41 C.F.R. Section 60-2.13(f); 60-2.24 (a-h)

THE SELECTION PROCESS

1. At least annually, a detailed analysis of position descriptions will be conducted to ensure that they accurately reflect position functions, and are consistent for the same position from one location to another.

2. Job requirements will be validated by Deans/Department Heads. Special attention will be given to academic, experience, physical, and skill requirements to ensure that the requirements themselves do not constitute inadvertent discrimination. Job specifications will be made consistent for the same job type in all locations and free from bias in regard to race, color, religion, sex or national origin, age, disabled or veteran status, except where sex is a bona fide occupational qualification.

3. Position descriptions and specifications, when used, will be distributed to all recruiting sources and members of management involved in the recruiting, screening, selection, and promotion processes.

4. All University selection processes will be evaluated by Human Resources at least annually to ensure that they are nondiscriminatory.

5. All personnel having any role in the selection process will be chosen with special care given to their qualifications for such roles, and will be provided any necessary ongoing training to ensure that the selection processes remain nondiscriminatory.

RECRUITMENT

Any one or all of the following techniques may be used to improve recruitment and increase the flow of minority or female applicants:

1. Linkage with recruiting sources which may include briefing sessions, tours, presentations by minority and female faculty and staff, and full descriptions of appropriate job openings and the selection process;

2. Encouragement of all faculty and staff including minority and female to refer qualified applicants;

3. Inclusion of minorities and women on the Human Resource staff and other key departments;
PROMOTIONS

Any one or all of the following techniques may be used to improve promotional opportunities for minority and female faculty and staff:

1. Posting or general announcement of all appropriate job openings;
2. Assessment of current female and minority individual’s academic, skill and experience levels;
3. Formal performance appraisals;
4. Validation of job specifications.

SECTION IX
SEX DISCRIMINATION GUIDELINES
41 C.F.R. Section 60-2.13(h); 60-20

It is the policy of MWU not to discriminate unlawfully against any member of the organization or applicant on the basis of gender. MWU maintains a policy of ensuring equal employment opportunities for all faculty and staff without regard to gender. Recruitment, advertising, selection, promotion, transfer and training are done on the basis of occupational qualifications.

To implement the policy against sex discrimination, the following employment practices have been established:

RECRUITMENT AND ADVERTISING
41 C.F.R. Section 60-2.20(a,b)

1. Recruitment of both men and women is done for all positions, unless gender is a bona fide occupational qualification. Referral sources are informed that MWU has no gender preference and seeks qualified applicants without regard to race, color, gender, religion, national origin, disabled, or veteran status.

2. "Help Wanted" advertising does not express a preference for a particular gender for any position. Advertisements are not placed in newspapers and other media headed "Males" or "Females". All advertisements are followed by "Equal Opportunity Employer - M/F" or similar notation.
1. Written Human Resource policies and practices apply to all faculty and staff regardless of gender.

2. Faculty, staff, and applicants of both gender are equally considered for all positions for which they are qualified to perform.

3. No distinction is made between genders regarding opportunity, wages, hours of work, benefits or other conditions of employment.

4. Married and unmarried men and women are treated equally in all conditions of employment. MWU does not deny employment to women or men with young children.

5. Appropriate and comparable physical facilities are provided for faculty, staff and applicants of both genders.

6. Federal guidelines concerning employment are followed. MWU does not recognize or apply state "protective" laws, which discriminate against a particular class or classes of individuals.

7. Leaves of absences are treated the same for everyone regardless of gender and marital status.

8. Women and men are eligible for all training programs and other benefits offered by MWU.

9. MWU will not discriminate based on sexual preference.
1. Individuals with disabilities related to pregnancy are treated in the same manner and are eligible for the same benefits under MWU’s insurance plan, as any other person with a disability caused by other medical conditions.

2. The same terms and conditions are applied to leaves due to disabilities arising out of pregnancy as are applied to leaves related to other medical conditions.

SEXUAL HARASSMENT
41 C.F.R. Section 60-20.3(a-e)

It is the policy of MWU that sexual harassment is a violation of acceptable conduct and will not be tolerated. Unwelcome advances, requests for physical favors, and other verbal and physical conduct of a sexual nature constitute sexual harassment when:

1. Submission to the conduct is made an implicit or explicit term or condition of employment;

2. Submission to or rejection of the conduct is used as a basis for an employment decision; or

3. Such conduct unreasonably interferes with an individual’s work performance or creates an intimidating, hostile, or offensive work environment. Anyone who feels that he or she is being sexually harassed should report this to a supervisor, manager, or the EEO Coordinator. MWU will investigate and take appropriate disciplinary action.

SENIORITY SYSTEM
41 C.F.R. Section 60-20.4

Where they exist, seniority lines and lists must not be based solely upon gender, race, national origin, or age.
DISCRIMINATORY WAGES
41 C.F.R. Section 60-20.5

(a) MWU's wage schedules will not be related to or based upon the gender, race, national origin or age.

(b) MWU will not discriminatorily restrict one gender to certain job classifications and when necessary will take steps to make jobs available to all qualified individuals in all classifications without regard to gender.

AFFIRMATIVE ACTION
41 C.F.R. Section 60-20.5

(a) MWU is committed to including qualified women candidates in all management trainee programs that may exit.

(b) MWU will take appropriate measures to monitor and insure that both genders have equal access to such training programs.

SECTION X
RELIGION AND NATIONAL ORIGIN DISCRIMINATION GUIDELINES
41 C.F.R. Section 60-50

MWU reaffirms its policy to afford equal employment opportunity to all individuals. Neither national origin nor religion is a factor in recruitment, selection, promotion, transfer, termination, or participation in training. The following activities are undertaken to ensure religion and national origin are not used as a basis for employment decisions:

1. Employment practices are reviewed to ensure that members of particular religious and/or ethnic groups are given equal employment opportunities.

2. All faculty and staff, including supervisors, managers, and executives are informed of MWU's duty to provide equal employment opportunity without regard to religion or national origin.

3. Recruitment sources are informed of MWU's commitment to provide equal employment opportunity without regard to religion or national origin.
ACCOMMODATION FOR RELIGIOUS OBSERVANCE AND PRACTICE
41 C.F.R. Section 60-50.3

The religious observances and practices are accommodated by MWU, except where such accommodation would cause undue hardship on the conduct of MWU business. The accommodation offered is determined by considering business necessity, financial expense, and any personnel coverage problems which may result.

NONDISCRIMINATION
41 C.F.R. Section 60-50.5

MWU does not discriminate against any qualified applicant or employee because of race, color, gender, age, disabled, or veteran status in implementing the policy concerning nondiscrimination based on religion or national origin.

SECTION XI
CONSIDERATION OF WOMEN AND MINORITIES
NOT CURRENTLY IN THE WORKPLACE
41 C.F.R. Section 60-2.13(j)

Consideration is given to women and minorities who are not currently in the workforce, but who possess the requisite skills and could feasibly be recruited through affirmative action. As appropriate, MWU will make good faith efforts to recruit qualified women and minorities not currently in the workforce.
Minority and female utilization goals are established to ensure that a contractor's affirmative action obligations are carried out in good faith. Goal setting is not intended, nor will it be used to discriminate against any applicant or employee because of race, color, national origin, or gender. In setting goals, the following criteria will be considered:

1. Goals must be measurable and attainable.

2. Goals must not be rigid quotas. Goals are targets which are reasonably attainable by the application of good faith efforts.

3. Goals and affirmative action commitments must be designed to correct identifiable deficiencies. Separate goals are set for minorities and women when underutilization is identified.
As part of MWU's monitoring practice, an analysis of Human Resource issues will be conducted for 1997. The following items will be considered:

1. The selection process including: position descriptions, titles, application forms, pre-employment forms, interview procedures, test validity and administration, referral procedures, final selection process and similar factors. The application and related pre-employment forms are in compliance with federal guidelines, and position descriptions accurately reflect actual duties and responsibilities.

2. Transfer and promotion practices. Promotions and transfers are made on the basis of qualifications of the individual without regard to race, color, gender, religion, national origin, disabled, or veteran status.

3. Facilities and MWU sponsored recreational social, and educational events have not excluded women and minorities from participation.

4. The general attitude of the workforce and management is positive toward MWU's Equal Employment/Affirmative Action programs.

5. EEO posters and policy statements are displayed. The EEO clause will be included on purchase orders, leases and contracts.

6. There is no indication of a lack of suitable transportation inhibiting minority employment.

7. MWU reviews its training programs, both formal and informal, and has not found them to be discriminatory. These programs will be analyzed annually or when appropriate.
SECTION XIV
AFFIRMATIVE ACTION PROGRAM
FOR
THE DISABLED AND VETERANS OF THE VIETNAM ERA

Company: Midwestern University
Address: 555 - 31st Street
         Downers Grove, IL 60515

EEO Coordinator: Angela Marty, Director of Human Resources
President/Chief Executive Officer: Kathleen H. Goeppinger, Ph.D.
POLICY
41 C.F.R. Section 60-741.1; 60-250.1

It is the policy at MWU to provide equal employment and advancement opportunities to all qualified individuals. To achieve this goal, MWU is dedicated to taking affirmative action to employ and advance in employment, qualified disabled persons, disabled veterans, and veterans of the Vietnam Era, in compliance with Section 503 of the Rehabilitation Act of 1973 and Section 402 of the Vietnam Era Veterans Readjustment Act of 1974. MWU is committed to take voluntary, positive action in providing affirmative action and equal employment opportunity to disabled persons, disabled veterans, and veterans of the Vietnam Era. In addition, faculty, staff and applicants are protected from coercion, intimidation, interference or discrimination for filing a complaint or assisting in an investigation under the Act. MWU's goal is the utilization of qualified disabled persons and covered veterans in as many levels of position classifications as practicable.

Equal Employment Opportunity will best be achieved by combining this Veterans and disabled Affirmative Action Plan with MWU's general Affirmative Action Program. As provided in United States Code 38 USC 2012 and Code of Federal Regulations 60-250.5, the required policies, practices, and procedures are integrated into this Affirmative Action Program.

A copy of MWU's Equal Employment Opportunity statement is posted which reaffirms our commitment to qualified disabled individuals and covered veterans. This program is available for review upon request by contacting the EEO Coordinator during regular business hours.
APPLICABILITY OF THE AFFIRMATIVE ACTION PROGRAM
41 C.F.R. Section 60-741.5; 60-250.5

All faculty, staff and applicants will be invited to identify themselves as disabled, disabled veterans, or veterans of the Vietnam Era in order to participate in MWU's Affirmative Action Program.

A. Disabled Definitions:

The Rehabilitation Act of 1973, as amended, defines a "disabled individual" as any person who has a physical or mental impairment which substantially limits one or more of such person's major life activities, has a record of such impairment, or is regarded as having such an impairment.

"Life Activities" may be considered to include communication, ambulation, self-care, socialization, education, vocational training, employment, transportation, adapting to housing, etc.

Primary attention is given to those life activities that affect employability.

The phrase "substantially limits" means the degree that the impairment affects employability. A disabled individual who is likely to experience difficulty in securing, retaining, or advancing in employment would be considered substantially limited.

"Has a record of such an impairment" means that an individual may be completely recovered from a previous physical or mental impairment. It is included because the attitude of employers, supervisors, and co-workers toward that previous impairment may result in an individual's experiencing difficulty in securing, retaining, or advancing in employment. The mentally restored and those who have had heart attacks or cancer often experience such difficulty. Also, this part of the definition would include individuals who may have been erroneously classified and may experience discrimination based on this misclassification. This group may include persons such as those who have been misclassified as mentally retarded or mentally restored.

"Is regarded as having such an impairment" refers to those individuals who are perceived as having a disability, whether an impairment exists or not, but who, because of attitudes or for any other reason, are regarded as disabled by employers or supervisors who have an effect on the individual's securing, retaining, or advancing in employment.

"Qualified disabled individuals" means a disabled individual who is capable of performing a particular job, with reasonable accommodation to his or her disability.
B. Veteran Definitions:

"Special disabled veteran" means a veteran who is entitled to compensation under laws administered by the Veterans Administration for disability rated at 30 percent or more, or rated at 10 or 20 percent in the case of a veteran who has been determined under section 1506 of this title to have a serious employment handicap; or a person who was discharged or released from active duty because of a service connected disability. "Veteran of the Vietnam Era" means a eligible veteran any part of whose active military, naval, or air service was during the Vietnam era. "Disabled veteran" means a veteran who is entitled to compensation or but for the receipt of military pay would be entitled to compensation under the laws administered by the Department of Veterans' Affairs, or a person who was discharged or released from active duty because of a service related disability.

"Eligible veteran" means a person who served on active duty for a period of more than 180 days and was discharged or released therefrom with other than a dishonorable discharge; was discharged or released from active duty for a service-connected disability; or as a member of a reserve component under an order to active duty pursuant to section 672(a), (d), or (g), 673 or 673b of title 10, served on active duty during a period of war or in a campaign or expedition for which a campaign badge is authorized and was discharged or released from such duty with other than a dishonorable discharge.
DISSEMINATION OF POLICY
41 C.F.R. Section 60-741.6(f)-(g), 60-250.6(f)-(g)

In order to facilitate the successful implementation of the plan, the following internal measures will be taken:

1. The EEO policy statement will be posted on the Human Resource bulletin board. This notice will state the name of the EEO Coordinator, and to whom questions, comments, or complaints should be directed. All required state and federal EEO notices are also posted on bulletin boards.

2. Notice of Affirmative Action Plan. MWU's affirmative action plan is available in the office of the EEO Coordinator for review.

3. Training Programs. Educational and training programs may be offered to assist in personal development, as well as to increase skills and ability to perform the job. MWU will continue to ensure that all faculty and staff have the opportunity to participate in such programs without regard to disabled, or veterans status.

To assure proper external dissemination of MWU's EEO Policy, the following activities will be undertaken:

1. Recruitment Sources. All appropriate recruitment sources will be notified of MWU's commitment to equal employment opportunity and affirmative action. All suitable openings will be listed with a local State Unemployment Office.

2. Advertisements. All advertisements seeking applicants for employment will identify MWU as an "equal opportunity employer."

3. Applicants. Application forms state MWU's commitment to equal employment opportunity. Notices to recruitment sources and all employment advertisements state this EEO policy.

4. Contractual Instruments. MWU will incorporate the Equal Opportunity Clause regarding disabled individuals, disabled veterans and Vietnam Era veterans in its purchase orders, leases and contracts as required by law, executive order and regulation. All suppliers and subcontractors will be requested to comply with their affirmative action requirements.
5. Training Programs. Educational and training programs may be offered to assist in personal development as well as to increase their skills and ability to perform on the job. MWU will continue to ensure that all faculty and staff have the opportunity to participate in such programs without regard to disabled or veteran status.

MWU will review its employment practices to assure that its Human Resource programs are consistent with its Affirmative Action Program for disabled individuals and covered veterans.
AFFIRMATIVE ACTION PRACTICES AND PROCEDURES

Proper Consideration of Qualifications
41 C.F.R. Section 60-741.6(b); 60-250.6(b)

MWU will periodically review its employment procedures to assure careful, thorough and systematic consideration of the job qualifications of known disabled individuals and covered veteran applicants for job vacancies filled either by hiring or promotion, and for all training opportunities offered or available.

This will be accomplished by identifying and reviewing the qualifications of disabled individuals and covered veterans before the final selection for a position is made.

Physical and Mental Qualifications
41 C.F.R. Section 60-741.6(c), 60-250.6(c)

At least annually, MWU will review all physical and mental job qualification requirements with Deans and Department Heads to ensure that, to the extent qualification requirements tend to screen out qualified disabled individuals or disabled Veterans, they are job-related and consistent with business necessity and the safe performance of the job.

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

Information obtained from applicants, faculty, staff concerning a physical or mental condition is kept confidential, except that:

(a) Supervisors and managers may be informed regarding accommodations or restrictions on work or duties;

(b) First aid and safety personnel may be informed when, and to the extent, appropriate, if the condition might require emergency treatment; and

(c) Government officials investigating compliance with the EEO laws will be informed. All physical or mental job qualifications will be reviewed and updated annually.
Reasonable Accommodation
41 C.F.R. Section 60-741.6(d), 60-250.6(d)

MWU makes reasonable accommodations to the physical and mental limitations of faculty, staff, or applicants to the extent that such accommodation does not impose an undue hardship on the conduct of its business. MWU’s building planning includes reasonable accommodation to the special needs of disabled individuals and disabled veterans including access to the building, utilization of rest room facilities, and mobility requirements within the building and parking locations.

Compensation
41 C.F.R. Section 60-741.6(e), 60-250.6(e)

In offering employment or promotions to disabled individuals or covered veterans' MWU does not reduce the amount of compensation offered because of any disability income, pension, or other benefit that is received from non-University sources.

RESPONSIBILITY FOR IMPLEMENTATION
41 C.F.R. Section 60-741.6(h); 60-250.6(h)

Angela Marty has been designated to direct the activities of the Affirmative Action Program. Angela Marty has the full support of Kathleen H. Goeppinger, Ph.D., President, in carrying out MWU’s Affirmative Action Policy. Angela Marty will be responsible for:

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

2. Identify and discuss any problem areas with management, and develop solutions.

3. Serve as a liaison between MWU and community groups, governmental agencies and vocational rehabilitation organizations.

4. Inform management of the latest developments in the affirmative action and equal employment opportunity area.

5. Serve as a liaison between MWU and organizations for disabled persons and covered veterans.

6. Assist in career counseling for disabled and covered veterans.

7. Ensure that the policy statement and required posters are posted on bulletin boards.
PLAN OF ACTION
41 C.F.R. Section 60-741.6(i); 60-250.6(i)

MWU’s Affirmative Action Program is a result oriented plan designed to enhance the opportunities of qualified disabled persons and covered veterans. MWU realizes that the success of this Plan will be largely the result of the "good faith efforts" explained in this section. Management fully supports the implementation of this Plan.

RECRUITMENT

MWU considers qualified disabled persons and covered veterans for employment. As necessary and when appropriate, MWU will contact local, state, and federal employment referral sources and specialized placement agencies that have offices in the local area.

SELECTION

The application and self identification forms are in compliance with state and federal agency regulations and guidelines.

All physical and mental job requirements are reviewed to ensure that they are job related and do not screen out qualified disabled persons or disabled veterans, and that reasonable accommodations are made.

PROMOTIONS

Records, including those covered veterans and disabled individuals, are reviewed to assure that qualified individuals are given consideration when opportunities for promotions or transfers occur.

TRAINING

Disabled and covered veterans are given equal access to all training programs, whether in house or offered outside. Any educational tuition reimbursement program will be available to all who desire to further their employment opportunities by continuing their education.
FACILITIES

When designing new facilities or remodeling old, special consideration will be given to the removal of architectural barriers to the disabled, whenever economically and physically practicable.

SUBCONTRACTS

An equal employment opportunity clause will be included in each covered contract or subcontract. The clause may be incorporated by reference.