



# **Affirmative Action Plan**

## **Veterans and Individuals with Disabilities**

**October 2023 to September 2024**

# Table of Contents

<b>I. STATEMENT OF PURPOSE</b> .....	1
A. Purpose and Applicability to Veterans and Individuals with Disabilities .....	1
B. Invitation to Self-Identify (41 CFR 60-300.42; 41 CFR 60-741.42) .....	1
<b>II. IMPLEMENTATION AND RESPONSIBILITY</b> .....	6
A. Board of Trustees .....	6
B. Executive Staff, Line Management, and Supervisors.....	6
C. Affirmative Action Officer .....	6
D. Reference to Regulations .....	7
<b>III. REVIEW OF EMPLOYMENT PROCESSES</b> .....	8
A. Selection Procedures.....	8
B. Recruitment .....	9
C. Education .....	10
D. Harassment Prevention and Prohibition against Retaliation .....	10
<b>IV. INTERNAL AND EXTERNAL DISSEMINATION</b> .....	12
A. Internal Dissemination.....	12
B. External Dissemination .....	13
<b>V. INTERNAL AUDIT AND REPORTING SYSTEMS</b> .....	14
A. Applicant Tracking for Faculty Vacancies .....	14
B. Human Resources Management System for Staff Vacancies.....	15
C. Data Collection and Analysis .....	16
D. Veterans' Employment Reports .....	17
<b>VETS-4212 EMPLOYMENT REPORT</b> .....	18
<b>Web Addresses</b> .....	23

## **I. STATEMENT OF PURPOSE**

### **A. Purpose and Applicability to Veterans and Individuals with Disabilities**

Purdue University Fort Wayne receives a portion of the University's federal contracts, and is required by federal law to develop a written affirmative action program for veterans and individuals with disabilities. This program complies with Section 503 of the Rehabilitation Act of 1973 and the Vietnam Era Veterans' Readjustment Act of 1974 (38 USC 4212), as amended. We believe a complete affirmative action program also includes mechanisms that enable the University to continually monitor and evaluate its employment practices to ensure that they are free from bias and discrimination based on race, religion, color, sex, age, national origin or ancestry, genetic information, marital status, parental status, sexual orientation, gender identity and expression, disability, or status as a veteran.

The purpose of the Purdue Fort Wayne Affirmative Action Plan for Veterans and Individuals with Disabilities is to reaffirm the University's continuing commitment to the principles of affirmative action and equal employment opportunity. The plan serves as a working document for reporting academic and staff employment actions and for distributing information relevant to the development, analysis, enforcement, evaluation, dissemination, and monitoring of the plan and its policies.

### **B. Invitation to Self-Identify (41 CFR 60-300.42; 41 CFR 60-741.42)**

As part of Purdue Fort Wayne's affirmative action obligation, the University invites applicants for employment to state whether the applicant believes that s/he is an individual with a Disability and/or a Protected Veteran. After an offer of employment has been made, but before the individual begins working, Purdue Fort Wayne again offers the opportunity to state whether the individual believes that s/he is an individual with a Disability and/or a Protected Veteran. Additionally, at five-year intervals, the University invites employees to voluntarily inform Purdue Fort Wayne whether the employee believes that s/he is an individual with a Disability. At least once during the intervening years between invitations to self-identify their Disability status, Purdue Fort Wayne reminds employees that they may voluntarily update their Disability and/or Veteran status.

All information that Purdue University Fort Wayne maintains on self-identification is kept confidential.

## **1. Reaffirmation of Policy**

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

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

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

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

The President of the University is charged with overall responsibility for nondiscrimination and equal opportunity. In furtherance of the University's equal employment opportunity and affirmative action obligations, the President of the University implemented the preceding policy through a number of actions, including issuance of the *Equal Opportunity, Equal Access and Affirmative Action policy* which can be found online at <http://www.purdue.edu/policies/ethics/iic2.html>.

## **2. Access to the Plan**

The University maintains and renews this plan annually. It is available for inspection Monday through Friday from 8:00 a.m. to 5:00 p.m. in Human Resources and Office of Institutional Equity. The plan is also available online at <https://www.pfw.edu/offices/human-resources/ethics-compliance/equal-access-equal-opportunity>. Questions about the University's Affirmative Action Plan for Veterans and

Individuals with Disabilities or about affirmative action may be directed to Human Resources and Office of Institutional Equity at [hr@pfw.edu](mailto:hr@pfw.edu) or by calling 260-481-6840.

### **3. Applicability**

This Affirmative Action Plan for Veterans and Individuals with Disabilities applies to the operations of all schools and departments managed on and affiliated with Purdue Fort Wayne.

### **4. Definitions**

#### ***Active Duty Wartime or Campaign Badge Veteran***

Any veteran who served on active duty in the U.S. military, ground, naval, or air service during a war, or in a campaign or expedition for which a campaign badge has been authorized under the laws administered by the Department of Defense.

#### ***Armed Forces Service Medal Veteran***

Any veteran who while serving on active duty in the U.S. military, ground, naval, or air service, participated in a United States military operation for which an Armed Forces service medal was awarded pursuant to Executive Order 12985 (61 FR 1209).

#### ***Disability***

An individual with a disability is one who has (1) a physical or mental impairment that substantially limits one or more major life activities for such individual; (2) a record of such an impairment; or (3) is regarded as having such an impairment.

This definition does not include individuals: (1) currently engaging in the illegal use of drugs when the University acts on the basis of such use; (2) whose current use of alcohol prevents them from performing the essential functions of the employment position or whose current alcohol abuse would constitute a direct threat to property or to the health or safety of the individual or others; or (3) who currently has a contagious disease or infection that prevents them from performing the essential functions of the employment position, or who, by reason of such disease or infection, would constitute a direct threat to the health or safety of the individual or others. *Exceptions to this definition are found in Section 1630.3 of the Americans with Disabilities Act (ADA).*

#### ***Disabled Veteran***

A disabled veteran is (1) a veteran of the U.S. military, ground, naval, or air service who is entitled to compensation (or who but for the receipt of military retired pay would be entitled to compensation) under laws administered by the Secretary of Veterans Affairs, or (2) a person who was discharged or released from active duty because of a service-connected Disability.

### ***Discrimination***

The process of illegally differentiating between people on the basis of group membership rather than on individual merit.

### ***Equal Opportunity Employment***

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

### ***Individual Discrimination***

When a person is subjected to unequal treatment on the basis of race, religion, color, sex, age, national origin or ancestry, genetic information, marital status, parental status, sexual orientation, gender identity and expression, disability, or status as a veteran.

### ***Other Protected Veteran***

A veteran who served on active duty in the U.S. military, ground, naval or air service during a war or in a campaign or expedition for which a campaign badge has been authorized, under the laws administered by the Department of Defense.

### ***Qualified Individual with a Disability***

A person who satisfies the requisite skill, experience, education, and other job-related requirements of the employment position such individual holds or desires and who, with or without reasonable accommodation(s), can perform the essential functions of such position.

### ***Protected Veteran***

This term includes a ***Disabled Veteran***, a ***Recently Separated Veteran***, an ***Active Duty Wartime*** or ***Campaign Badge Veteran***, and ***Armed Forces Service Medal Veteran***.

### ***Reasonable Accommodation***

A modification or adjustment to a job, the work environment, or the way a job is usually done that enables a Qualified Individual with a Disability to enjoy an Equal Employment Opportunity.

***Recently Separated Veteran***

Any veteran who served on active duty in the U.S. military, ground, naval, or air service, during the three-year period beginning on the date of such veteran's discharge or release from active duty.

**Systemic Discrimination**

Unequal treatment that results from "neutral" institutional practices that continue the effect of past discrimination.

**Undue Hardship**

An action that requires significant difficulty or expense in relation to the size of the employer, the resources available, and the nature of the operation.

## II. IMPLEMENTATION AND RESPONSIBILITY

Ultimate responsibility for compliance with nondiscrimination and affirmative action laws and policies rests with the Board of Trustees, vested in the University's executive officers.

### A. Board of Trustees

The University is governed by a ten-member Board of Trustees appointed by the Governor of the State of Indiana. Their charge includes selecting the President of the University, deciding major policies, approving the financial program and budget, approving the President's nominations for major appointments, and approving all construction and major contracts. The Board of Trustees and the President are responsible for all aspects of each campus of the University, including Purdue Fort Wayne.

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

Dr. Ronald L. Elsenbaumer, Purdue Fort Wayne Chancellor, has full responsibility for the successful implementation of the University's Equal Employment Opportunity policy and Affirmative Action plan, including the plan for Veterans and Individuals with Disabilities for the Fort Wayne campus.

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

Department heads, directors, and supervisors at each campus are responsible for promoting equal employment opportunity and implementing affirmative action policies. Evaluations of administrators and supervisors include their equal employment opportunity and affirmative action efforts and results.

### C. Affirmative Action Officer

Christine M. Marcuccilli, Director of Compliance & Title IX Coordinator, is responsible for developing, coordinating, and maintaining an annual Affirmative Action Plan for Veterans and Individuals with Disabilities for the Fort Wayne campus.



**D. Reference to Regulations**

This plan is intended to comply fully with all pertinent sections of 41 CFR 60-250.44 – Veterans and 41 CFR 60-741.44 – Individuals with Disabilities, whether or not specifically cited.

### III. REVIEW OF EMPLOYMENT PROCESSES

#### A. Selection Procedures

Education, skills, and experience specifications have been established for the ranking and referral of applicants with administrative, technical, or service job interests. These specifications are reviewed and used in comparison to each applicant's work experience, skills, and knowledge.

##### **1. Education of Selection Personnel**

Deans, department heads, and other unit managers responsible for making hiring decisions are taught equal employment opportunity requirements in workshops offered by Human Resources and Office of Institutional Equity and the Office of Academic Affairs.

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

Human Resources and Office of Office of Institutional Equity adheres to the Uniform Guidelines on Employee Selection in its screening and referral process.

##### **3. Job Requirements and Descriptions**

###### **Faculty**

Each academic department is responsible for reviewing faculty job specifications for job-relatedness and non-discrimination. The deans and/or department heads create job descriptions for faculty positions. Human Resources and Office of Institutional Equity reviews these descriptions when circumstances dictate.

###### **Staff**

Human Resources and Office of Institutional Equity reviews all non-faculty position specifications for job-relatedness and non-discrimination on the basis of race, color, religion, national origin, veteran status, disability, age, or sex, except where age or sex is a bona fide occupational qualification. A job description bank is maintained, which lists the requirements for non-faculty position at the University. The Classification and Compensation Administrator reviews these descriptions whenever there is a position vacancy or when other circumstances dictate. In addition, reviews may be requested by a unit supervisor.

#### **4. Referral Procedures**

##### **Faculty**

After a position has been posted and/or advertised, the credentials of all applicants are referred to the Search and Screen Committee for the position or its hiring supervisor. Search and Screen Committees have access to The Faculty/Librarian Recruitment Manual. In addition, they communicate with Human Resources and Office of Institutional Equity and present their recruitment plan for review.

##### **Staff**

Pre-screening of applicants for staff positions is accomplished by the Talent Acquisition Consultant in Human Resources and Office of Institutional Equity. The pre-screening process is used to verify credentials and determine applicant interest for a particular position. Once the applicant pool is set, the hiring supervisor determines which of the applicants to interview. The pool must be exhausted, with no applicant hired, before another pool is established. Hiring supervisors are encouraged to work with the Talent Acquisition Consultant and Human Resources and Office of Institutional Equity to ensure that employment is based on a fair evaluation of each applicant's qualifications.

#### **5. Pre-employment Inquiries**

Both Sections 503 and 504 of the Rehabilitation Act of 1973 and the ADA limit the use of pre-employment inquiries and medical examinations. Specifically, any identification of a disability by inquiry or examination during the pre-offer stage, including all job pre-tests, reference checks, interview form/questions, and other information gathering procedures, is prohibited.

#### **B. Recruitment**

##### **1. Appropriateness of Outreach**

The Human Resources and Office of Institutional Equity are responsible for coordinating advertising activities designed to attract applications for vacant positions and to assure that advertising will reach veterans and individuals with disabilities. Employment opportunities are publicized in a variety of media.

Purdue Fort Wayne University employment advertisements and brochures encourage qualified veterans and individuals with disabilities to apply for employment opportunities and clearly indicate that accommodations and physical access will be ensured for everyone. University guidelines for effective recruitment include, but are not limited to, the following:

- Each employing unit must consider an applicant in terms of the essential elements necessary to performing the job competently with or without accommodation(s).
- All applicants, including veterans and individuals with disabilities, who express interest in applying for positions are given the opportunity to request reasonable accommodation/alternative format statements.
- Any determination of disability shall be accorded the confidentiality of other medical data and shall not be used to exclude a qualified individual with a disability.
- Human Resources and Office of Institutional Equity should be consulted to assist in accommodations being considered by the employing unit that involve analyzing and restructuring jobs for qualified applicants with disabilities.

## **2. Review of Sources**

Human Resources and Office of Institutional Equity maintains a list of recruitment sources to assist departments in their recruitment efforts and to assure appropriate notice of employment opportunities. Departments, however, are expected to be familiar with the principal sources specific to their particular area of expertise.

### **C. Education**

All educational programs offered through the University are open to participation by veterans and individuals with disabilities. Accommodations are made to support participation by individuals with disabilities.

### **D. Harassment Prevention and Prohibition against Retaliation**

The Anti-Harassment policy (III.C.1) states:

*“Harassment in the workplace or educational environment is unacceptable conduct and will not be tolerated.” [Further,] this policy seeks to encourage faculty, staff and students to report and address incidents of Harassment. Retaliation against faculty members, staff members or students for reporting or complaining of Harassment, for assisting or participating in the investigation of a complaint of Harassment, or for enforcing this policy is strictly prohibited.”*

All employees bringing complaints alleging discrimination are directed and encouraged to use the procedures established for filing complaints, as modified by the Equal Opportunity, Equal Access and Affirmative Action (III.C.2) policy. At Purdue Fort Wayne,

the Director of Compliance, Human Resources and Office of Institutional Equity is responsible for overseeing and coordinating the enforcement of policies and procedures that deal with harassment.

Human Resources and Office of Institutional Equity reviews, monitors and responds to complaints or requests for assistance. It pursues any patterns or trends which suggest a need for remedial actions. Past reviews have shown that few such complaints are made by veterans or individuals with disabilities and that there are no patterns requiring special investigation or remedial action.

No complaints of discrimination based on Veterans Status were received the 2023-2024 year.

## IV. INTERNAL AND EXTERNAL DISSEMINATION

The University disseminates its equal employment opportunity policy both internally and externally utilizing the following procedures:

### A. Internal Dissemination

#### 1. *Published Documents and Postings*

The University's equal employment opportunity/equal access/affirmative action (EO/EA/AA) policy ([III.C.2 - University Policy Office - Purdue University](#)) is annually communicated by Vice President for Ethics and Compliance, Alysa Christmas Rollock. The EO/EA/AA policy is also included in the *Faculty and Staff Handbook*. Equal employment opportunity posters and other required notices are displayed in locations where employment applications are received and on public bulletin boards in every campus building.

#### 2. *Programs and Presentations*

The Director of Compliance & Title IX Coordinator, meets and emphasizes this policy with senior executive staff and in regular meetings with top administrators, deans, department heads, directors of divisions and offices, and other faculty and staff groups.

Human Resources and Office of Institutional Equity informs each department head and each search and screen Committee of their EO/EA/AA responsibilities at the beginning of each search process.

The Purdue Fort Wayne Office of Academic Affairs manual, *Faculty/Librarian Recruitment* contains information on equal employment opportunity and affirmative action regulations, policies, and procedures. The Purdue Fort Wayne Human Resources and Office of Institutional Equity's manual, *Staff Recruitment and Selection* also contains information on equal employment opportunity and affirmative action regulations, policies, and procedures.

This Affirmative Action Plan for Veterans and Individuals with Disabilities is distributed, reviewed, and discussed as a part of the regular EO/EA/AA process described above and is a part of regular affirmative action education programs presented by Human Resources and Office of Institutional Equity.

Our Marketing and Communications Department ensures that veterans and individuals with disabilities are represented in all advertising and promotional

materials. Human Resources and Office of Institutional Equity monitors all other handbooks, policy manuals, and brochures to assure representation.

## **B. External Dissemination**

### **1. Advertisements and Notices**

Each advertisement of a vacant position is required to include a statement in clear distinguishable type:

*“Purdue Fort Wayne is an EEO/AA employer fully committed to achieving a diverse workforce. All individuals, including minorities, women, individuals with disabilities, and protected veterans are encouraged to apply.”*

Human Resources and Office of Institutional Equity, and the Purchasing Department work jointly to approve placement of ads in all newspapers, journals and other professional publications before publication.

In-person applicants are informed of the policy through posters displayed in the reception area of Human Resources and Office of Institutional Equity. The Purchasing Department sends written notification of the policy, including the equal opportunity clause, to all sub-contractors, vendors, and suppliers doing business with the University.

### **2. Contract Compliance**

The University informs all contractors, vendors, and suppliers of the Equal Access/Equal Opportunity/Affirmative Action policy and requests appropriate action on their part.

### **3. Other Methods**

The Director of Compliance, Human Resources and Office of Institutional Equity and the Director of Disability Access Center communicate with organizations representing veterans, organizations representing individuals with disabilities, and community agencies and leaders about the Affirmative Action Plan for Veterans and Individuals with Disabilities and the University policies regarding Equal Access/Equal Employment Opportunity/Affirmative Action.

## V. INTERNAL AUDIT AND REPORTING SYSTEMS

### A. Applicant Tracking for Faculty Vacancies

When there is a vacant faculty or academic position, the department provides the position description, the procedures to be used in screening applicants, the advertising plan, and other relevant information. The information must be reviewed and approved by the dean of the school, the Vice Chancellor for Academic Affairs, and the Human Resources and Office of Institutional Equity before action may be taken by the department.

Once the vacant position has been fully approved, the department can place the ad and begin screening applicants. Purdue Fort Wayne uses SuccessFactors, the Human Capital Management system. This system allows Talent Acquisition to maintain and have accurate and up-to-date records on all recruitment activity. This system tracks each stage in the hiring process for every applicant, and provides Talent Acquisition the opportunity to match each applicant to particular vacancies for which he/she wishes to be considered. This provides Purdue Fort Wayne the ability to analyze and monitor selection decisions.

To apply for a job on the Purdue Fort Wayne campus, interested applicants log onto the system and fill out an online applicant profile, which includes their education, experience, and demographic information. Applicants can browse the available positions and select those of interest. Individuals are able to apply from home, the public library, or from any computer connected to the Internet at any time, day or night. All faculty uses this system.

Talent Acquisition reviews applicant credentials, and refers those qualified to the hiring department. The department then reviews credentials, and selects the individuals they wish to interview or pursue further. The disposition of each applicant is captured by the system and provides the basis for analyzing results, including impact ratio analyses by Human Resources and Office of Institutional Equity. The dean of the school, the Vice Chancellor for Academic Affairs, and Human Resources and Office of Institutional Equity must approve requests for interviews and requests for offers before the department can take action.

In addition to requiring full documentation of the hiring process, the procedures allow for the dean of the school, the Vice Chancellor for Academic Affairs, and Human Resources and Office of Institutional Equity to review each individual employment search, and where appropriate, intervene to ensure equal opportunity and affirmative action on the part of hiring officials. When the applicant pool contains qualified women or minority candidates whom the department does not initially indicate will be interviewed, the school may be



contacted to request that a second review be conducted of candidate(s) materials, plus a justification for the interview decision.

**B. Human Resources Management System for Staff Vacancies**

For staff vacancies, Purdue Fort Wayne uses SuccessFactors, the Human Capital Management system. This system allows Talent Acquisition to maintain and have accurate and up-to-date records on all recruitment activity. This system tracks each stage in the hiring process for every applicant, and provides Talent Acquisition the opportunity to match each applicant to particular vacancies for which he/she wishes to be considered. This provides Purdue Fort Wayne the ability to analyze and monitor selection decisions. To apply for a job on the Purdue Fort Wayne campus, interested applicants log onto the system and fill out an online applicant profile, which includes their education, experience, and demographic information. Applicants can browse the available positions and select those of interest. Individuals are able to apply from home, the public library, or from any computer connected to the Internet at any time, day or night. All non-instructional staff classification uses this system.

Talent Acquisition reviews applicant credentials, and refer those qualified to the hiring department. The department then reviews credentials, and selects the individuals they wish to interview or pursue further. The disposition of each applicant is captured by the system and provides the basis for analyzing results, including impact ratio analyses by Human Resources and Office of Institutional Equity.

### C. Data Collection and Analysis

#### *Protected Veterans*

Purdue Fort Wayne has chosen to adopt OFCCP’s current 5.6% hiring benchmark goal for Protected Veterans as opposed to calculating our own percentage goal. OFCCP’s 5.6% benchmark is not a quota that Purdue Fort Wayne must meet, nor is it intended to represent a floor or ceiling for the University’s recruitment of qualified Protected Veterans. Purdue Fort Wayne will document the following computations or comparisons pertaining to staff applicants and hires on an annual basis and maintain them for a period of three (3) years:

1. The total number of applicants for jobs;
2. The number of applicants who self-identified as Protected Veterans or who are otherwise known as Protected Veterans;
3. Total number of hires;
4. Number of Protected Veteran applicants hired;
5. Total workforce; and
6. Total employees who identify as protected Veteran

<b>Analysis of Protected Veterans Data</b>		
<b>Applicants</b>	<b>Total</b>	<b>%</b>
Total Applicants	1268	
Protected Veteran Applicants	31	2.44%
<b>Hires</b>	<b>Total</b>	<b>%</b>
Total Hires	194	
Protected Veteran Hires	7	3.60%
<b>Workforce</b>	<b>Total</b>	<b>%</b>
Total Workforce	1291	
Total Protected Veteran Employees	218	16.89%

*Individuals with Disabilities*

Purdue Fort Wayne maintains data regarding the recruitment and hiring of individuals who self-identify as individuals with Disabilities. This data is used to evaluate the representation of individuals with Disabilities in the University’s workforce. These figures are not a quota that the university must meet, nor are these figures intended to represent a floor or ceiling for the employment of Qualified Individuals with Disabilities. Purdue Fort Wayne will document the following computations or comparisons pertaining to staff applicants and hires on an annual basis and maintain them for a period of three (3) years:

1. The total number of applicants for jobs;
2. The number of applicants who self-identified as Individual with Disability (IWD);
3. Total number of hires;
4. Number of applicants with disability hired;
5. Total workforce; and
6. Total employees who identify as Individual with a Disability

<b>Analysis of Individuals with Disabilities (IWD) 503 AAP Data</b>		
<b>Applicants</b>	<b>Total</b>	<b>%</b>
Total Applicants	1268	
IWD Applicants	132	10.41%
<b>Hires</b>	<b>Total</b>	<b>%</b>
Total Hires	194	
IWD Hires	21	10.82%
<b>Workforce</b>	<b>Total</b>	<b>%</b>
Total Workforce	1291	
Total IWD Employees	63	4.89%

**D. Veterans’ Employment Reports**

The Veterans’ Employment Report (VETS-4212) is completed annually. The most recent VETS-4212 report is listed below on page 18 of this brochure.

# VETS-4212 EMPLOYMENT REPORT

## Federal Contractor Veterans' Employment Report (VETS-4212)

### FEDERAL CONTRACTOR VETERANS' EMPLOYMENT REPORT VETS-4212

OMB NO: 1293-0005  
Expires: 04/30/2024

RETURN COMPLETED REPORT TO:  
VETS-4212 Submission  
Veterans' Employment and Training Service Center  
Department of Labor National Contact Center (DOL-NCC)  
3110 Fairview Park Drive, Suite 800  
Falls Church, VA 22042

Persons are not required to respond to this collection of information unless it displays a valid OMB number. It is mandatory for a covered Federal contractor respond to this information collection. See 38 U.S.C. § 4212(d) and "Who Must File" section of instructions.

ATTN: Human Resource/EEO Department

<b>TYPE OF REPORTING ORGANIZATION</b> (Check one or both, as applicable) <input checked="" type="checkbox"/> Prime Contractor <input type="checkbox"/> Subcontractor	<b>TYPE OF FORM</b> (Check only one) <input type="checkbox"/> Single Establishment <input type="checkbox"/> Multiple Establishment-Headquarters <input checked="" type="checkbox"/> Multiple Establishment-Hiring Location <input type="checkbox"/> Multiple Establishment-State Consolidated (specify number of locations) (MSC)
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COMPANY IDENTIFICATION INFORMATION (Omit items preprinted above-ADD Company Contact Information Below)

COMPANY No: T131942	TWELVE MONTH PERIOD ENDING	0	8	3	1	2	0	2	3
		M	M	D	D	Y	Y	Y	Y
NAME OF PARENT COMPANY: Purdue University		ADDRESS (NUMBER AND STREET): 155 S Grant Street							
CITY: West Lafayette		COUNTY: Tippecanoe		STATE: IN		ZIP CODE: 47907			
NAME OF COMPANY CONTACT: Chaoran Chen		TELEPHONE FOR CONTACT: 4109007546			EMAIL: chen3497@purdue.edu				

NAME OF HIRING LOCATION: Purdue University Fort Wayne	ADDRESS (NUMBER AND STREET): 2101 Coliseum Blvd East
CITY: Fort Wayne	COUNTY: Allen
	STATE: IN
	ZIP CODE: 46805

NAICS: 0 0 6 1 1 3	DUNS: 0 7 - 2 0 5 - 1 3 9 4	EMPLOYER ID (IRS TAX No.): 3 5 - 6 0 0 2 0 4 1
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**INFORMATION ON EMPLOYEES**

REPORT THE TOTAL NUMBER OF EMPLOYEES AND NEW HIRES WHO ARE PROTECTED VETERANS, AS DEFINED IN THE INSTRUCTIONS. DATA ON NUMBER OF EMPLOYEES ARE TO BE ENTERED IN COLUMN A AND B, LINES 1.1 THROUGH 9. DATA FOR NEW HIRES ARE ENTERED IN COLUMNS C AND D. LINE 10 IS TOTAL OF EACH COLUMN. ENTRIES IN COLUMNS C AND D, LINES 1.1 THROUGH 9 (GRAY SHADED AREAS) ARE OPTIONAL. ENTER THE MAXIMUM AND MINIMUM NUMBER OF EMPLOYEES.				
JOB CATEGORIES	NUMBER OF EMPLOYEES		NEW HIRES (PREVIOUS 12 MONTHS)	
	PROTECTED VETERANS (A)	TOTAL EMPLOYEES (B)	PROTECTED VETERANS (C)	TOTAL NEW HIRES (D)
EXECUTIVE/SENIOR LEVEL OFFICIALS AND MANAGERS 1.1	0	32	0	2
FIRST/MID LEVEL OFFICIALS AND MANAGERS 1.2	0	59	0	4
PROFESSIONALS 2	5	497	0	52
TECHNICIANS 3	6	72	1	8
SALES WORKERS 4	0	0	0	0
ADMINISTRATIVE SUPPORT WORKERS 5	1	107	1	24
CRAFT WORKERS 6	2	14	2	3
OPERATIVES 7	0	0	0	0
LABORERS/HELPERS 8	0	0	0	0
SERVICE WORKERS 9	4	66	0	18
<b>TOTAL EMPLOYEES 10</b>	<b>18</b>	<b>847</b>	<b>4</b>	<b>111</b>

Report the total maximum and minimum number of permanent employees during the period covered by this report.

Maximum Number	Minimum Number
847	829

Form VETS-4212 11/2014

## **Federal Contractor Veterans' Employment Report (VETS-4212)**

**WHO MUST FILE:** This VETS-4212 Report is to be completed by all nonexempt Federal contractors and subcontractors with a contract or subcontract in the amount of \$150,000 or more with any department or agency of the United States for the procurement of personal property or non-personal services. Services include but are not limited to the following services: utility, construction, transportation, research, insurance, and fund depository, irrespective of whether the government is the purchaser or seller. Entering into a covered Federal contract or subcontract during a given calendar year establishes the requirement to file a VETS-4212 Report during the following calendar year.

**WHEN TO FILE:** This annual report must be filed no later than September 30.

**LEGAL BASIS FOR REPORTING REQUIREMENTS:** Title 38, United States Code, Section 4212(d) mandates that Federal contractors and subcontractors subject to the statute's affirmative action provisions in 38 U.S.C. 4212(a) report, at least annually, the number of employees in their workforces by job category and hiring location, and the number of such employees, by job category and hiring location, who are qualified protected veterans. In addition, Federal contractors and subcontractors must report the total number of new hires during the period covered by the report and the number of such new hires who are qualified protected veterans. Further, Federal contractors and subcontractors must report on the maximum and minimum number of employees during the period covered by the report. The Department of Labor's Veterans' Employment and Training Service (VETS) has promulgated regulations found at 41 CFR part 61-300 to implement the reporting requirements of 38 U.S.C. 4212(d). The regulations require contractors and subcontractors to file the VETS-4212 Report to comply with the requirements of 38 U.S.C. 4212(d). The regulations in 41 CFR part 61-300 can be found at [http://www.dol.gov/dol/cfr/Title\\_41](http://www.dol.gov/dol/cfr/Title_41).

**HOW TO FILE THE VETS-4212 REPORT:** The preferred method for filing VETS-4212 Reports is electronically through the VETS web-based filing system. Instructions for electronically filing the VETS-4212 Report are found on the VETS website at <http://www.dol.gov/vets/vets4212.htm>. Alternative filing methods are described below in these instructions.

**Single Establishment Employers:** Employers doing business at one hiring location may complete and submit a single VETS-4212 Report using the web-based filing system, or submit a single paper version of the VETS-4212 Report, as described below under Alternative Filing Methods.

**Multi-Establishment Employers:** Employers doing business at more than one hiring location, must file: (A) a VETS-4212 Report covering the principal or headquarters office; (B) a separate VETS-4212 Report for each hiring location employing 50 or more persons; and (C) EITHER, (i) a separate VETS-4212 Report for each hiring location employing fewer than 50 persons, OR (ii) consolidated reports that cover hiring locations within one State that have fewer than 50 employees. Multi-establishment employers doing business at more than 10 locations must submit their VETS-4212 Reports in the form of an electronic data file that complies with current Department of Labor specifications for the format of these records, and any other specifications established by the Department for the applicable reporting year. Multi-establishment employers with fewer than 10 hiring locations are strongly encouraged to submit their VETS-4212 Reports in the form of an electronic data file, but are not required to do so. In these cases, state consolidated reports count as one location each. VETS-4212 Reports in the form of electronic data files may be submitted through the web-based filing system. Electronic data files also may be

transmitted electronically as an e-mail attachment (if they do not exceed the size stated in the specifications), or submitted on compact discs or other electronic storage media.

**ALTERNATIVE FILING METHODS:** The VETS-4212 Report may also be filed in paper format. Reporting organizations may download a paper version of the VETS-4212 Report from the VETS website at <http://www.dol.gov/vets/vets4212.htm> or send a written request for the paper version of the VETS-4212 Report to: Office of the Assistant Secretary for Veterans' Employment and Training, U.S. Department of Labor, 200 Constitution Avenue, NW, Room S-1325, Washington, DC 20210, Attn: VETS-4212 Report Form Request.

**WHERE TO FILE:** VETS-4212 Reports in paper format or electronic data files on compact discs or other electronic storage media may be delivered by U.S. mail or courier delivery service to: Veterans' Employment and Training Service, c/o Department of Labor National Contact Center, 7425 Boston Blvd Springfield, VA 22153. Paper copies of the VETS-4212 Reports and electronic data files (if they do not exceed the size stated in the specifications) also may be sent as e-mail attachments to: [VETS4212-customersupport@dol.gov](mailto:VETS4212-customersupport@dol.gov)

**HOW TO PREPARE THE VETS-4212 REPORT:** All fields and answers to questions in all areas of the VETS-4212 Report are mandatory unless otherwise specified below. If the multi-establishment employer has hiring locations employing fewer than 50 persons, the employer may file separate reports for each hiring location or consolidated reports that cover multiple hiring locations within one state.

**Type of Reporting Organization:** Indicate the type of contractual relationship (prime contractor or subcontractor) that the organization has with the Federal Government. If the organization serves as both a prime contractor and a subcontractor on various federal contracts, check both boxes. If a reporting organization submits only one VETS-4212 Report for a single location, check the Single Establishment box. If the reporting organization submits more than one VETS-4212 Report, one report should be checked as Multiple Establishment-Headquarters. The remaining VETS-4212 Reports should be checked as either Multiple Establishment-Hiring Location or Multiple Establishment-State Consolidated. For state consolidated reports, the number of hiring locations included in that report should be entered in the space provided. For each report, only one box should be checked within this block.

**Company Identification:** Please note: If a Federal Contractor Report has been filed in the past, you need to utilize the company number assigned in previously submitted reports. If a company number is not available please leave the field blank. If there are any questions regarding a Company Number, please call the VETS-4212 Customer Support Center at (866) 237-0275 or e-mail [VETS4212-customersupport@dol.gov](mailto:VETS4212-customersupport@dol.gov).

**Twelve Month Period Ending:** Enter the end date for the twelve month reporting period used as the basis for filing the VETS-4212 Report. To determine this period, select a date in the current year between July 1 and August 31 that represents the end of a payroll period. The selected date will be the basis for reporting the Number of Employees, as described below. The twelve-month period preceding that date is your twelvemonth covered period. This period is the basis for reporting New Hires, as described below. Any Federal contractor or subcontractor that has written approval from the Equal Employment Opportunity Commission to use December 31 as the ending date for the EEO-1 Report may also use that date as the ending date for the payroll period selected for the VETS-4212 Report.

**Name and Address for Single Establishment Employers:** Complete the identifying information under the Parent Company name and address section.

**Name and Address for Multi-Establishment Employers:** For parent company headquarters location, complete the name and address for the parent company headquarters and leave blank the name and address of the Hiring Location. For hiring locations of a parent company, complete the address for the Parent Company location, complete the name and address for the Hiring Location.

**NAICS Code, DUNS Number, and Employer ID Number:** Single Establishment and Multi-Establishment Employers must complete the North American Industry Classification System (NAICS) Code, Dun and Bradstreet I.D. Number (DUNS), and Employer Identification Number (EIN) as described below:

- **NAICS Code:** Enter the six (6) digit NAICS Code applicable to the hiring location for which the report is filed. If there is not a separate NAICS Code for the hiring location, enter the NAICS Code for the Parent Company.
- **DUNS Number:** If there is a specific Dun and Bradstreet Identification applicable to the hiring location for which the report is filed, please enter the nine (9) digit in the space provided. If the hiring location does not have a DUNS Number, enter the DUNS number for the Parent Company. If an appropriate DUNS Number cannot be identified, leave this field blank.
- **Employer I.D. Number (EIN):** Enter the nine (9) digit number assigned by the I.R.S. to the contractor. If there is a specific EIN applicable to the hiring location for which the report is filed, enter that EIN. Otherwise, enter the EIN for the Parent Company.

**Number of Employees:** Report the total number of employees who are protected veterans for each of the 10 occupational categories (Lines 1.1 through 9) in column A. Report the total number of employees, including protected veterans, for each of the 10 occupational categories (Lines 1.1 through 9) in column B. Blank spaces will be considered zeros.

**New Hires (Previous 12 Months):** Report the total number of employees who were hired and included in the payroll for the first time during the 12-month period preceding the ending date of the selected payroll period. Report the total number of new hires who are protected veterans in column C. Report the total number of new hires, including protected veterans, in column D. Providing new hire data for each of the occupational categories (columns C and D, lines 1.1 through 9) is optional. Blank spaces will be considered zeros.

**Maximum/Minimum Employees:** Report the maximum and minimum number of employees on board during the twelve-month period covered by this report, as indicated by 41 CFR 61-300.10(a)(3).

#### **DEFINITIONS:**

**'Employee'** – means any individual on the payroll of an employer who is an employee for purposes of the employer's withholding of Social Security taxes except insurance sales agents who are considered to be employees for such purposes solely because of the provisions of 26 U.S.C. 3121 (d)(3)(B) (the Internal Revenue Code). Part-time employees and leased employees are included in the definition of 'employee.' The definition does not include persons hired on a casual basis for a specific job ( e.g., persons at a construction site whose employment relationship is expected to terminate with the end of the employee's work at the site); persons employed temporarily in an industry other than construction who are hired through a hiring hall or some other referral arrangement; or persons on the payroll of an

employment agency who are referred by such agency for work to be performed on the premises of another employer under that employer's direction and control, as provided in 41 CFR 61-300.2(b)(5).

'Hiring location' – means an establishment as defined at 41 CFR 61-300.2(b)(6).

'Job Categories' – means any of the following: Officials and Managers (Executive/Senior Level Officials and Managers and First/Mid-Level Officials and Managers), Professionals, Technicians, Sales Workers, Administrative Support Workers, Craft Workers, Operatives, Laborers and Helpers, and Service Workers and are defined in 41 CFR 61-300.2(b)(7).

'Protected Veteran' – means a veteran who is protected under the nondiscrimination and affirmative action provisions of the Vietnam Veterans' Readjustment Assistance Act, 38 U.S.C. 4212; specifically a veteran who may be classified as an active duty wartime or campaign badge veteran, disabled veteran, Armed Forces service medal veteran, or recently separated veteran,

- **'Active duty wartime or campaign badge Veteran'** – means a veteran who served on active duty in the U.S. military, ground, naval or air service during a war or in a campaign or expedition for which a campaign badge has been authorized under the laws administered by the Department of Defense.
- **'Armed Forces Service Medal Veteran'** – means any veteran who, while serving on active duty in the U.S. military, ground, naval or air service, participated in a United States military operation for which an Armed Forces service medal was awarded pursuant to Executive Order 12985 (61 FR 1209, 3 CFR, 1996 Comp., p. 159).
- **'Disabled Veteran'** – means (1) A veteran of the U.S. military, ground, naval or air service who is entitled to compensation (or who but for the receipt of military retired pay would be entitled to compensation) under laws administered by the Secretary of Veterans Affairs, or (2) A person who was discharged or released from active duty because of a service-connected disability.
- **'Recently Separated Veteran'** – means a veteran during the three-year period beginning on the date of such veteran's discharge or release from active duty in the U.S. military, ground, naval or air service.

**RECORD KEEPING:** Employers must keep a copy of the completed annual VETS-4212 Report(s) submitted to DOL for a period of three years.

**Public Burden Statement: Public reporting burden for this collection is estimated to average 20 minutes per location to make an electronic filing and 40 minutes per location to make a paper filing, including the time for reviewing instructions, searching existing data source, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to the Department of Labor, Veterans' Employment and Training Service, Office of Information Management, Room N-1316, 200 Constitution Avenue, NW, Washington D.C. 20210 or electronically transmitted to VETS4212-customersupport@dol.gov All completed VETS-4212 Reports should be sent to the address indicated on the front of the form. See actual VETS-4212 Report for additional disclosures.**



## WEB ADDRESSES

- The Nondiscrimination Policy Statement *Equal Opportunity, Equal Access and Affirmative Action policy* can be found online at <http://www.purdue.edu/policies/ethics/iic2.html>.
- The “Procedures for Resolving Complaints of Discrimination and Harassment” is available online at <http://www.purdue.edu/ethics/resources/resolving-complaints.php>.
- The faculty and staff handbook is online at [http://www.purdue.edu/faculty\\_staff\\_handbook/](http://www.purdue.edu/faculty_staff_handbook/).
- The Anti-Harassment policy (III.C.1) is available online at <http://www.purdue.edu/policies/ethics/iic1.html>.