AFFIRMATIVE ACTION POLICY STATEMENT
FOR VETERANS AND INDIVIDUALS WITH DISABILITIES

Northern Michigan University’s Affirmative Action Policy for veterans and individuals with disabilities is designed to provide equal opportunity for such individuals. The University has issued a policy statement setting forth their commitment to equal employment opportunity and affirmative action which includes qualified employees with disabilities.

The University shall ensure, to the extent that mental and physical job qualifications tend to screen out veterans and persons with a disability, that such qualifications are job related and/or consistent with business necessity and/or the safe performance of the job. Except as noted, the University will make reasonable accommodations for the documented disability of qualified applicants and employees as defined by the Americans with Disabilities Act and state and federal disability law.

The University recognizes that the employment of veterans and individuals with disabilities is in the University’s best interests by utilizing the employment skills possessed by such individuals as well as by meeting an important social responsibility. The University will take affirmative action to employ, advance in employment, and otherwise treat veterans and qualified individuals with disabilities without discrimination. The University will make reasonable accommodations for the documented disabilities of employees and applicants, consistent with the qualifications required for the work to be performed and with the effective operations of the University.

Review of Personnel Processes
To ensure that all personnel activities are conducted in a job-related manner which provides and promotes equal employment opportunity for all known covered veterans and employees and applicants with disabilities, reviews are periodically made of the University’s selection methods to identify barriers to employment, training and promotion.

The University periodically conducts a review of its employment processes to ensure thorough and systemic consideration of the job qualifications of known covered veterans and employees and applicants with disabilities for job vacancies filled either by external hiring or internal promotions/transfers, as well as for all training opportunities available. In order to determine whether an individual is qualified for a particular job, an examination of the content of the job is made, as well as a review of the job qualifications of known disabled veterans, other veterans, and individuals with disabilities, both applicants and employees. In determining the qualifications of a covered veteran, consideration is only given to that portion of the military record, including discharge papers, relevant to the job qualifications for which the veteran is being considered.

The University ensures that its personnel processes do not stereotype veterans or disabled persons in a manner which limits their access to jobs for which they are qualified.
Physical and Mental Qualifications
To ensure that all physical and mental qualifications and requirements are job-related and promote equal employment opportunity for all known covered veterans and employees and applicants with disabilities, reviews are periodically made of the University’s physical and mental qualifications and requirements as they relate to employment, training and promotion.

The University’s physical and mental job requirements are reviewed to determine whether or not they are job-related and consistent with business necessity and safe performance on the job.

Any previously reviewed classification will be reviewed again if there is a change in working conditions which affects the job’s physical or mental requirements (e.g., new requirements, new equipment, etc.)

Information gathered on medical questionnaires or physical examinations shall be kept confidential except that:

- Managers and supervisors may be informed regarding restrictions on the work or duties of disabled veterans, accommodations, or the presence of a communicable disease.
- If the condition may require emergency treatment, first aid and safety personnel may be informed.
- Government officials investigating compliance with the Act will be informed.

Reasonable Accommodation to Physical and Mental Limitations
Northern Michigan University will make every effort to provide reasonable accommodations to physical and mental limitations of applicants and employees with disabilities or who are disabled veterans unless it can demonstrate that the accommodations would impose an undue hardship on business operations. This determination will be made by the Equal Opportunity Officer. The University will consider the business necessity and financial cost and expense of the accommodation when determining the extent of its obligations.

Harassment
Northern Michigan University has developed and implemented procedures to ensure that its employees who are disabled or other veterans are not harassed due to those conditions. Employees and applicants of Northern Michigan University will not be subject to harassment, intimidation, threats, coercion, or discrimination because they have engaged or may have engaged in filing a complaint, assisting in a review, investigation, or hearing or have otherwise sought to obtain legal rights related to any Federal, State, or local law regarding equal employment opportunity for an individual with a disability. Any employee or applicant who feels that they have been subject to harassment, intimidation, threats, coercion, or discrimination because of their disability or veteran status should contact the Equal Opportunity Office at 906-227-2420 for assistance.
External Dissemination of Policy, Outreach and Positive Recruitment

Northern Michigan University will:

- Review its employment practices and personnel policies to determine whether its personnel programs provide disabled veterans, other veterans and individuals with disabilities equal opportunity for employment and advancement.

- Initiate and maintain communication with organizations having special interests in recruitment and job accommodations for disabled veterans, other veterans and individuals with disabilities.

- Send written notification of the University’s policy to all subcontractors, vendors and suppliers requesting appropriate action on their part.

- Inform all recruiting sources of the University’s affirmative action policy for disabled veterans, other veterans, and individuals with disabilities.

Internal Dissemination of Policy

In order to gain positive support and understanding for the Affirmative Action Program for veterans and individuals with disabilities, Northern Michigan University will implement, or continue to implement, the following internal dissemination procedures. The following policies and procedures are designed to foster support and understanding from senior management, management, supervisors, and other employees in an effort to encourage all employees to take the necessary action to aid the University in meeting its obligations.

- Include the policy in the University’s policy manual and other in-house publications.

- Management and supervisory personnel will be advised of the policy and their individual responsibility for effective implementation.

- The policy will be discussed in the employee orientation program.

- The University policy statement will be posted on bulletin boards, along with the University’s Non-Discrimination Statement, which includes protection from harassment on the basis of veteran status and disability.

- Recognize employee accomplishments in University publications.

- Inform union officials of the policy and request their cooperation.
Audit and Reporting System
Northern Michigan University will develop and implement an audit and reporting system that addresses the following:

- Measures the degree to which the University’s affirmative action objectives have been met;
- Indicates any need for remedial action;
- Measures the University’s compliance with affirmative action obligations; and
- Determines whether there are any undue hurdles for individuals with disabilities and veterans regarding University sponsored educational, training, recreational, and social activities.

Responsibilities for Implementation
As part of its efforts to ensure equal employment opportunity to disabled veterans, other veterans, and individuals with disabilities, Northern Michigan University has assigned the responsibility for implementation of the Affirmative Action Plan to the Equal Opportunity Officer. It is their responsibility to ensure the Affirmative Action Plan focuses on all components of the employment system. The responsibilities of the Equal Opportunity Officer are:

- Development of the Affirmative Action Plan for disabled veterans, other veterans, and individuals with disabilities; policy statements; personnel policies and procedures; internal and external communication of the policy; and monitor effectiveness.
- Review all personnel actions, policies, and procedures to ensure compliance with Northern Michigan University’s affirmative action obligations.
- Present all needed recommendations and procedural changes to Senior Management concerning equal opportunity and affirmative action and ensuring that Senior Management is kept informed of the University’s compliance status.
- Collaborate with Senior Management on equal opportunity and affirmative action issues.
- Ensure that management is aware:
  - of their responsibility to make reasonable efforts to provide a work environment that is free of bias; and
  - of their responsibility to prevent harassment of employees because of physical or mental disability.
- Assist supervisors, managers and other employees in the identification of problem areas and of solutions to those problems.
• Review results of audit and reporting systems to assess the effectiveness of the University’s Affirmative Action Program and to direct corrective actions when necessary.

• Maintain management support and cooperation for the University’s Affirmative Action Program.

• Keep management informed of the latest development in the equal opportunity for disabled veterans, other veterans and individuals with disabilities.

• Communicate with managers, supervisors, and employees on a regular basis to ensure that the University’s policies are being followed.

• Review affirmative action efforts in all departments to assure that disabled veterans, other veterans and individuals with disabilities are being given equal opportunity for hiring, promotion or transfer.

• Ensure that the Affirmative Action Plan is updated annually.

Compensation
Northern Michigan University agrees that when offering employment or promotion to disabled veterans, other veterans, and individuals with disabilities, the amount of compensation offered will not be reduced because of any disability income, pension, or other benefit the applicant or employee receives from another source.

Recordkeeping and Access to Records
Northern Michigan University has developed an Affirmative Action Plan for disabled veterans, other veterans and individuals with disabilities. The plan is available for inspection during normal business hours by making an appointment with the Equal Opportunity Office at 906-227-2420 or emailing jakoski@nmu.edu. The Equal Opportunity Office is located in 158 of the Services Building. The plan is also available at the Lydia Olson Library’s circulation desk for viewing during library hours of operation.

Affirmative Action Invitation to Applicants and Employees Disabled Persons
Northern Michigan University has developed an Affirmative Action Plan for disabled persons. If you are disabled, we would like to include you under our Affirmative Action Program.

If you receive a request for an accommodation, need a reasonable accommodation, or have questions contact Equal Opportunity at 906-227-2420. Submission of this information is voluntary and refusal to provide it will not subject you to any adverse treatment. The information provided will be kept confidential, except that:

• the hiring supervisor may be informed to assure consideration for employment under this plan,
• supervisors or managers may be informed regarding restrictions on work or duties of disabled individuals and regarding necessary accommodations,
• first aid and safety personnel may be informed, if the condition might require emergency treatment, and
• government officials investigating compliance with the Act shall be informed.

It would be helpful if you:
• describe any special methods, skills and procedures which qualify you for positions that you might not otherwise be able to do because of your disability, so that you will be considered for any position of that kind, and
• the reasonable accommodations which could be made to enable you to perform the job properly and safely, including special equipment, changes in physical layout of the job, elimination of certain duties relating to the job, or other accommodations.

Northern Michigan University has a complaint procedure to consider complaints of disabled persons, applicants and employees. Persons who believe they have been discriminated against because of a disability should contact the Equal Opportunity Office, 158 Services Building, 906-227-2420, email jakoski@nmu.edu. The office will investigate the complaint and provide a timely response.

**Affirmative Action Invitation To Veterans**
This employer is a Government contractor subject to Section 38-USC 4212 of the Vietnam Era Veterans Readjustment Assistance Act of 1974, as amended, and the Jobs for Veterans Act to take affirmative action to employ and advance in employment qualified special disabled veterans, veterans of the Vietnam era, recently separated veterans, and other protected veterans. This action applies to all employment practices, i.e., hiring, promotion, demotion or transfer, recruitment advertising, layoff or termination, rates of pay and benefits.

If you are a veteran of the Vietnam era, a special disabled veteran, a recently separated veteran, or other protected veteran, we would like to include you under our Affirmative Action Program. If you would like to be included under the Affirmative Action Program, please tell us.

- The term “special disabled veteran” refers to a veteran 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 Department of Veterans Affairs 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 by the Department of Veterans Affairs to have a serious employment handicap. The term also refers to a person who was discharged or released from active duty because of a service-connected disability.

- The term “veteran of the Vietnam era” refers to a person who served on active duty for a period of more than 180 days, and was discharged or released there from with other than dishonorable discharge, if any part of such active duty occurred in the Republic of Vietnam between February 28, 1961, and May 7, 1975 or between August 5, 1964, and May 7, 1975, in all other cases. The term also refers to a person who was discharged or released from active duty for a service-connected disability if any part of such active duty was performed in the Republic of Vietnam between February 28, 1961, and May 7, 1975, or between August 5, 1964, and May 7, 1975, in all other cases.
• The term “recently separated veteran” refers to any veteran during the one-year period beginning on the date of such veteran’s discharge or release from active duty.

• The term “other protected veteran” refers to a person who served on active duty during a war or in a campaign or expedition for which a campaign badge has been authorized, under laws administered by the Department of Defense.

You may inform us of your desire to benefit under the program at this time and/or at any time in the future.

Submission of this information is voluntary and refusal to provide it will not subject you to any adverse treatment. The information provided will be used only in ways that are not inconsistent with the Vietnam Era Veterans’ Readjustment Assistance Act of 1974, amended and the Job for Veterans Act.

The information you submit will be kept confidential, except that (i) supervisors and managers may be informed regarding restrictions on the work or duties of special disabled veterans, and regarding necessary accommodations; (ii) first aid and safety personnel may be informed, when and to the extent appropriate, if you have a condition that might require emergency treatment; and (iii) Government officials engaged in the enforcing laws administered by OFCCP, or enforcing the Americans with Disabilities Act, may be informed.

If you are a special disabled veteran it would assist us if you tell us about (i) any special methods, skills, and procedures which qualify you for positions that you might not otherwise be able to do because of your disability so that you will be considered for any positions of that kind, and (ii) the accommodations which we could make which would enable you to perform the job properly and safely, including special equipment, changes in the physical layout of the job, elimination of certain duties relating to the job, provision of personal assistance services or other accommodations. This information will assist us in placing you in an appropriate position and in making accommodations for your disability.