

# The University of Wisconsin System

## UPS OPERATIONAL POLICY: EEO 1



**SUBJECT:** Affirmative Action Data

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**Original Issuance Date:** July 1, 2015  
**Last Revision Date:**

### 1. POLICY PURPOSE:

The purpose of this policy is to ensure that Affirmative Action/Equal Employment Opportunity (AA/EEO) data is collected by all UW institutions in a manner that is consistent with federally mandated definitions using a reliable collection technique.

### 2. POLICY BACKGROUND:

Data on sex/gender and racial/ethnic heritage are used to determine key reporting categories for federal, state, system wide and institutional reports. A procedure that ensures the collection of accurate sex/gender and racial/ethnic heritage data at the time of hire or during a later correction procedure will lessen the number of errors in the annual AA/EEO data compilations and save the time of affirmative action personnel who must identify and correct errors. Such a procedure can also be used to ensure accuracy and timeliness in the collection of the federally required data on veterans and individuals with disabilities.

In addition, the completion of all Integrated Postsecondary Education Data System (also known as EEO-1) surveys, in a timely and accurate manner is mandatory for all institutions that participate or are applicants for participation in any Federal financial assistance program authorized by [Title IV of the Higher Education Act of 1965](#), as amended. The completion of the surveys is mandated by [20 U.S.C. § 1094\(a\)\(17\)](#). The collection and reporting of racial/ethnic data are mandatory for all institutions that receive, are applicants for, or expect to be applicants for Federal financial assistance as defined in the Department of Education (ED) regulations ([34 C.F.R. § 100.13](#)), implementing [Title VI of the Civil Rights Act of 1964](#), or defined in any ED regulations implementing [Title IX of the Education Amendments of 1972](#). The collection of racial/ethnic data in vocational programs is mandated by Section 421(a)(1) of the [Carl D. Perkins Vocational Education Act of 1998](#).

### 3. POLICY DEFINITIONS:

Please see UPS Operational Policy [GEN 0: General Terms and Definitions](#) for a list of general terms and definitions.

#### **Definitions specific to this policy:**

“Sex/gender information” means male or female.

“Racial/ethnic heritage categories” are defined as according to regulations established by the federal government on collection and reporting of racial/ethnic data:

Hispanic or Latino: A person of Cuban, Mexican, Puerto Rican, South or Central America, or other Spanish culture or origin regardless of race.

American Indian or Alaska Native: A person having origins in any of the original peoples of North and South America (including Central America) who maintains cultural identification through tribal affiliation or community attachment.

Asian: A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian Subcontinent, including for example Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.

Black or African American: A person having origins in any of the black racial groups of Africa.

Native American or Other Pacific Islander: A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

White: A person having origins in any of the original peoples of Europe, the Middle East or North Africa.

Two or More Races

A “veteran” is any person, who served honorably on active duty in the armed forces of the United States.

A “person with a disability” is any person who has a physical or mental impairment that substantially limits one or more major life activities; has a record of such impairment; or is regarded as having such impairment.

#### **4. POLICY:**

The UW System is committed to the uniform collection of the seven self-reported data elements (Hispanic or Latino, American Indian or Alaska Native, Asian, Black or African American, Native American or Other Pacific Islander, White and Two or More Races) for its federal, state, system wide and institutional reports. It is also committed to improving the accuracy of the data and the efficiency with which the collection task is accomplished. To achieve these ends UW System institutions will:

- A. Designate an office or a person who will be responsible for the procedure used to collect sex/gender, racial/ethnic heritage, veteran, protected veteran, and disability/handicap data from new employees.
- B. Ensure that the responsible office or person will collect the seven self-reported data elements according to the federally mandated definitions identified in this document. Employees should also be advised of the following:
  1. providing this information is optional;
  2. failure to submit the information will not in any way affect their present or future employment;
  3. the information will remain confidential and shared only on an authorized, need-to-know basis with selected personnel, at the institution or system level;
  4. the information will be used for affirmative action purposes, primarily mandated aggregate reporting; and

5. if they do not provide the racial/ethnic heritage information, federal regulations stipulate that a visual survey or post-employment records may be used to acquire racial/ethnic heritage information necessary for the completion of affirmative action reports.
- C. Specify the procedure the responsible office or person will use to collect and input these data into the UW System payroll files or other data files as selected by the institution.
- D. Assign an office or a person who will interact with affirmative action/equal employment opportunity personnel in the correction of sex/gender, racial/ethnic heritage, veteran, and disability/handicap data when necessary.

**5. RELATED DOCUMENTS:**

[Integrated Postsecondary Education Data System](#)  
[UW System Financial Policy G41: Affirmative Action Data Collection](#)  
[UW Regent Policy Document 17-4 Equal Employment Opportunities](#)  
[Racial Ethnic Reporting through IPEDS](#)

**6. POLICY HISTORY:**