

The University of Wisconsin System

Administrative Policy # 1202 (formerly EEO 2)



Title: Equal Employment Opportunity

Original Issuance Date: July 1, 2015

Last Revision Date: ~~September 23, 2022~~ July xx, 2025

1. Policy Purpose

The purpose of this policy is to ensure equal employment opportunity to all qualified individuals within all areas of employment across UW institutions.

2. Responsible UW System Officer

Associate Vice President and Chief Human Resources Officer

3. Scope and Institutional Responsibilities

This policy applies to all UW System Institutions, including all campuses and UW System Administration, except for UW-Madison. This policy operationalizes [Regent Policy Document 17-4, *Equal Opportunity and Affirmative Action in Employment*](#).

Institutions shall develop their own procedures consistent with this policy. Institutions may also develop guidance to support the policy and procedures.

4. Background

In accordance with [Regent Policy Document 17-4, *Equal Opportunity and Affirmative Action in Employment* \(RPD 17-4\)](#), [Executive Order 11246](#), and federal laws established by the Equal Employment Opportunity Commission, UW System institutions shall ensure equal opportunity to all employees and applicants for employment, and they shall maintain the affirmative action plans required by [RPD 17-4](#).

Effective July 1, 2015, the equal employment and affirmative action provisions contained in Wis. Stat. §§ [230.04\(9\)\(a\), \(b\) and \(c\)](#) and [230.06\(1\)\(g\)](#) no longer apply to UW System employees; therefore, the director of the office of state employment relations no longer monitors, evaluates, or makes recommendations regarding the provision of equal opportunity to UW System employees and applicants for employment and no longer establishes standards for affirmative action plans.

5. Definitions

Please see [SYS 1225, *General Terms and Definitions*](#), for a list of general terms and definitions.

Definitions specific to this policy:

Affirmative action: Specific actions in employment which are designed and taken for the purposes of all of the following:

- Ensuring equal opportunities.
- Eliminating a substantial disparity between the proportion of members of racial and ethnic, gender, veteran, or disabled groups in job groups within faculty, academic staff and university staff personnel structure, and the proportion of members of racial and ethnic, gender or disabled groups in the relevant labor pool.
- Eliminating present effects of past discrimination.

Job group: A set of titles combined on the basis of similarity in responsibility, pay range, and nature of work.

Underrepresentation: Having fewer women and/or minorities in a particular department, rank, or classification than would be reasonably expected by their availability.

6. Policy Statement

It is the policy of the University of Wisconsin System to adopt and support measures designed to prevent and eliminate discrimination against employees and prospective employees of the University of Wisconsin System on the basis of race, color, creed, sexual orientation, religion, sex, gender identity or expression, ancestry, national origin, age, veteran status or disability.

As a part of this policy, the University of Wisconsin System is committed to the implementation of affirmative action employment programs to recruit, employ, and promote qualified women, individuals belonging to underrepresented and underserved populations, individuals with disabilities, and veterans. The University of Wisconsin System shall continue to take such steps as may be necessary to accelerate the final elimination of any and all vestiges of discrimination because of race, color, creed, sexual orientation, religion, sex, gender identity or expression, ancestry, national origin, age, veteran status or disability that may still exist in the employment policies, practices and/or procedures of the University of Wisconsin System.

A. Basic Requirements

Each institution shall:

- I. Examine periodically all employment policies, practices, and procedures dealing with recruiting, interviewing, testing, screening, selection, placement, classification, evaluation, transfer, promotion, training, compensation, fringe benefits, layoffs, and terminations for discrimination on the basis race, color, creed, sexual orientation, religion, sex, gender identity or expression, ancestry, national origin, age, veteran status or disability and take remedial action to correct such discrimination if found to exist.
- II. Maintain a written affirmative action plan for the recruitment, employment, and promotion of women, individuals belonging to underrepresented and underserved populations, individuals with disabilities, and veterans, and monitor both hiring and termination for non-discrimination in accordance with System affirmative action guidelines and federal and state laws. Make the plan available upon request. Make summaries of affirmative action plans available upon request or through campus publications. Update the plan as necessary to keep it current. Prepare affirmative action reports for distribution at least once a year. The report should include an analysis of progress made together with any specific corrective action necessary to meet expected goals and objectives of the institution's affirmative action plan.
- III. Establish and maintain a committee (or committees, as appropriate) composed of faculty, academic staff, university staff, and students to advise the administration on the promotion of workforce diversity, and to assist affirmative action directors and/or Diversity, Equity and Inclusion Officers in designing and implementing programs. Committee members should have a genuine interest in affirmative action and represent the concerns of women, individuals belonging to underrepresented and underserved populations, veterans, and individuals with disabilities. The affirmative action director should serve as a resource and support person for affirmative action advisory committees and other institutional groups legitimately concerned with affirmative action.
- IV. Establish and publish effective procedures, consistent with the provisions of [Regent Policy Document 14-6, Discrimination, Harassment and Retaliation](#), for addressing discrimination complaints.

- V. Evaluate the performance of institutional administrators to include an assessment of efforts to support workforce diversity.
- VI. Establish or designate an affirmative action officer or director, and provide an adequate budget and staff support to each affirmative action director commensurate with institutional needs so that the affirmative action director can address the needs of all personnel.
- VII. Disseminate widely affirmative action and equal employment opportunity policies in the university community so that everyone, including students, will be apprised of such policies.

B. The Affirmative Action Plan

The Plan shall contain, as a minimum, the following components:

- I. Designated persons responsible for the program.
- II. An EEO/AA policy statement which includes at least a reference to [UW System Administrative Policies 1202](#) and [1203](#), as well as:
 - [Regent Policy Document 17-4, Equal Opportunity and Affirmative Action in Employment](#),
 - [Regent Policy Document 14-2, Sexual Violence and Sexual Harassment](#),
 - [Regent Policy Document 14-6, Discrimination, Harassment, and Retaliation](#), and
 - [Regent Policy Document 14-10, Nondiscrimination on Basis of Disability](#).
- III. An organizational profile of the institution's workforce using an "organizational display" or "workforce analysis that provides detailed data reflecting staffing patterns within the institution.
- IV. Job group analysis that combines jobs at the institution with similar content, wage rates and opportunities into job groups.
- V. Availability analysis of qualified women and minorities within the natural geographic labor market.
- VI. A utilization analysis that compares incumbency versus estimated availability of women and minorities.
- VII. A utilization analysis and/or hiring analysis covering individuals with disabilities and protected veterans. The utilization goal for individuals with disabilities shall be no less than 7%. The utilization goal for protected veterans shall be no less than 5.7%, or the current rate established by the Wisconsin state government for public employees.
- VIII. If the utilization analysis reveals underutilization, the identification of placement goals that serve as reasonably attainable objectives and to measure progress toward achieving equal employment opportunity.
- IX. Identified problem areas that are impediments to equal employment opportunity.
- X. Review of progress towards prior year placement goals.
- XI. If problem areas are identified, a description of action-oriented programs to eliminate problems and attain the established goals.
- XII. Explanation of internal audit and reporting systems which includes a reference to [UW System Administrative Policy 220, Affirmative Action Data Collection](#).
- XIII. Documentation that the institution reviews personnel processes to ensure that the job qualifications of applicants and employees who are known to be protected veterans and applicants and employees with known disabilities are given careful, thorough and systematic consideration for job vacancies and training opportunities.
- XIV. Documentation that the institution periodically reviews all physical and mental job qualification standards to ensure that any qualification standard that screens out or tends to screen out qualified individuals with disabilities or disabled veterans is job-related and consistent with business necessity.

- XV. Confirmation that the institution follows a reasonable accommodations policy, both as a matter of nondiscrimination and as a matter of affirmative action.
- XVI. A description of outreach and positive recruitment efforts for individuals with disabilities and protected veterans and evaluation of effectiveness of those efforts.
- XVII. Documentation of the internal and external dissemination of the institution's EEO Policy.
- XVIII. Documentation of EEO training provided to all personnel involved in the hiring process, as well as individuals involved in disciplinary and related processes.
- XIX. Documentation that the institution extends an invitation for voluntary self-identification of an employee's race, disability status and veteran status as least once every five years.
- XX. The institution's annual IPEDS report.
- XXI. Any other components required by law.

7. Related Documents

Wis. Stat. § [230.16\(6\), Applications and examinations](#)

Wis. Stat. § [230.25\(3\)\(b\), Certification, appointments and registers](#)

[Regent Policy 14-2, Sexual Harassment Policy Statement and Implementation](#)

[Regent Policy 14-10, Nondiscrimination on Basis of Disability: Policy Statement](#)

~~[Regent Policy 17-2, Establishment of Equal Opportunity Employment Offices](#)~~

[UW System Administrative Policy 1201, Affirmative Action Data](#)

[UW System Administrative Policy 1203, Employment of Veterans](#)

8. Policy History

[Revision 2: July xx, 2025](#)

~~Last revised~~[Revision 1](#): September 23, 2022

First approved: July 1, 2015

9. Scheduled Review

[July 2030](#)
