AFFIRMATIVE ACTION PROGRAM
FOR
INDIVIDUALS WITH DISABILITIES

OHIO UNIVERSITY

Summary Report
and
Athens Campus Data

November 1, 2013 – October 31, 2014

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Preface

Ohio University (also referred to as "OHIO" or "the University") is committed to the concept and practice of equal opportunity and affirmative action. In the preparation of this Affirmative Action Program (AAP), the University has been guided by Section 503 of the Rehabilitation Act of 1973 (as amended) (29 U.S.C. § 793) and its implementing regulations (41 C.F.R. Part 60-741). In developing and implementing this AAP, Ohio University has been guided by its established policy of providing equal employment opportunity. As a University dedicated to promoting non-discriminatory employment practices, this document is intended to provide data for the institutional leadership in order to assess our employment practices to assure they are fair and equitable. This AAP has been developed under the Guidelines on Affirmative Action issued by the Equal Employment Opportunity Commission ("EEOC") (29 C.F.R. Part 1608).

This AAP does not constitute an express or implied contract between Ohio University and its employees, job applicants, or other persons, nor does it change in any way the basic at will employment relationship all public university employees have with OHIO. Nothing in this AAP creates a private right of action on behalf of any individual or group against Ohio University.
Equal Employment Opportunity and Affirmative Action Statement of Policy
41 C.F.R. 60-741.44(a)

STATEMENT OF POLICY

The University has established a written AAP with respect to equal opportunity. This AAP has been prepared in conformity with E.O. 11246 and the implementing regulations of OFFCP, 41 C.F.R. Part 60-1 et seq. This AAP is designed to provide guidance to management with respect to the University's commitment to full implementation of its EEO/affirmative action policy (www.ohio.edu/policy/40-001.html).

EQUAL EMPLOYMENT AND EDUCATIONAL OPPORTUNITY*

There shall be no discrimination against any person in employment or educational opportunities because of race, color, religion, age, national origin, national ancestry, sex, pregnancy, gender, gender identity or expression, sexual orientation, military service or veteran status, mental or physical disability, or genetic information, except as explicitly provided for in this policy. University faculty, staff, students, or volunteers may not retaliate against a person who has made a protected disclosure under this policy.

Ohio University accepts the important distinction between affirmative action and equal opportunity. Equal opportunity assumes that the concept of merit based solely on a person's ability to perform will govern all personnel and educational decisions. Ohio University is committed to achieve equal opportunity via affirmative action, which requires specific efforts to recruit, admit, employ, transfer, and promote members of groups previously excluded. The assertion of this distinction gives impetus to the institution's renewed search for approaches and programs designed to meet the University's goals and objectives. This is being done in recognition that benign neutrality tends to perpetuate the status quo.

The realization of affirmative action objectives increases the heterogeneity of the University community and facilitates knowledge of the values and cultures of peoples of the world. This adds to the multicultural educational mission and indicates the University's commitment for cultural pluralism in the belief that this is beneficial to all people and essential in strengthening the fabric of society. This commitment demands that opportunities be provided for people who have been denied educational justice.

The responsibility for overseeing the University's compliance with affirmative action requirements has been delegated by the President of the University to Dianne Bouvier, Interim Executive Director of the Office for Institutional Equity. Every member of the University community, however, is charged with the responsibility for its attainment.

*Excerpt from OHIO Policy and Procedure No. 40.001, approved by Ohio University, August 3, 2012.
Ohio University

Affirmative Action Policy

It is the policy of Ohio University that there shall be no discrimination against any individual in educational or employment opportunities because of race, religion, color, sex, sexual orientation, national origin, ethnicity, ancestry, age, gender identity or expression, mental or physical disability, or military veteran status. There also shall be no discrimination because of age except in compliance with requirements of retirement plans or state and federal laws and guidelines. Discrimination on the basis of age or sex or disability will be prohibited except where specific age, sex, or physical requirements constitute a bona fide occupational qualification (BFOQ) necessary to proper and efficient performance. The University maintains a vigorous affirmative action program in order to promote equal employment opportunities and to ensure non-discrimination in all educational programs and activities. All programs which implement this policy will be reviewed on an annual basis.

Ohio University accepts the important distinction between affirmative action and equal opportunity. Equal opportunity assumes that the concept of merit based solely upon a person’s perceived ability to perform job duties will exclusively govern all personnel decisions. While committed to honoring equal opportunity, OHIO also pledges to take direct and affirmative action to recruit, employ, and promote members of groups previously excluded for consideration.* The assertion of this distinction gives impetus to the institution’s renewed search for approaches and programs designed to attain our goals and objectives. This is being done in recognition that benign neutrality in employment practices tends to perpetuate the status quo.

OHIO’s educational mission includes fostering a climate that represents and embraces the inclusion of persons of all backgrounds, thus enhancing the University’s ability to provide its students and employees with the experiences necessary to successfully thrive and achieve in an increasingly diverse and complex society. We are committed to cultural pluralism in the belief that this is beneficial to all people and essential in strengthening the fabric of the global community. This commitment demands that we provide opportunities and access for people who have been denied educational justice.

The responsibility of overseeing the University’s compliance with affirmative action requirements has been delegated by the President of the University to the Executive Director for Institutional Equity. Every member of the University community, however, is charged with the responsibility for its realization.

Any questions or comments regarding this policy should be communicated to:

Dianne Bouvier, Ph.D.
Interim Executive Director
Title IX Coordinator and ADA/504 Coordinator
Office for Institutional Equity
101 Crewson House
(740) 593-9132

Roderick J. McDavis, President
August 20, 2014

*"Affirmative Action groups or categories" refers to the following individuals: persons who are women; are Hispanic/Latino, American Indian or Alaska Native, Asian, Black or African American, Native Hawaiian or Other Pacific-islander, or identify as having two or more races; are covered veterans; and/or have a physical or mental disability.
OHIO UNIVERSITY
NOTICE of NONDISCRIMINATION

Ohio University does not discriminate on the basis of race, color, religion, national origin, sex, disability, sexual orientation, gender identity or expression, age, or military veteran status in its employment practices or in the provision of educational programs and services. The following person has been designated to handle inquiries regarding the University's nondiscrimination policies, to receive discrimination/harassment complaints from members of the university community, and to monitor the institution's compliance with state and federal nondiscrimination laws and regulations:

Dianne Bouvier, Ph.D., M.A., M.B.A., C.A.A.P
Interim Executive Director, Office for Institutional Equity
Title IX and ADA/504 Coordinator
Office of the Executive Vice President and Provost
Ohio University
101 Crewson House
Athens, Ohio 45701
Voice: 740.593.9132
Fax: 740.597.9059
www.ohio.edu/equity/

For more information about Ohio University's policies prohibiting discrimination and sexual harassment, and for a description of Ohio University's grievance procedures, please visit the webpage for the Office for Institutional Equity at www.ohio.edu/equity/

Ohio University is an equal access/equal opportunity affirmative action university.
www.ohio.edu/equity/upload/NonDiscrimination-Notice-9-8-14.pdf
"DISABILITY" means, generally, (i) a physical or mental impairment that substantially limits one or more of an individual's major life activities, (ii) a record of such impairment, or (iii) being regarded as having such impairment.

For the purposes of this Program, a disability is substantially limiting if it substantially impairs the ability of an individual to perform a major life activity as compared to most people in the general population. An impairment need not prevent, or significantly or severely restrict, the individual from performing a major life activity to be considered substantially limiting.

For the purposes of this Program, major life activities include but are not limited to the operation of a major bodily function, caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, sitting, reaching, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, interacting with others, and working.

"A QUALIFIED INDIVIDUAL" means an individual who satisfies the requisite skill, experience, education, and other job related requirements for the particular position he/she holds or desires and who is capable of performing the essential functions of that position, with or without reasonable accommodation for any disability.
Responsibility for Implementation
41 C.F.R. 60-741.44(i)

Roderick McDavis, President of Ohio University, has overall responsibility for implementation of the Equal Employment Opportunity Policy and the AAP. OHIO has assigned primary management responsibility and accountability for ensuring full compliance with the Program to Dianne Bouvier, Interim Executive Director and ADA/504 Coordinator, Office for Institutional Equity. As Affirmative Action Officer, Dianne Bouvier has the authority, resources, support of and access to top management necessary to ensure the effective implementation of the AAP. The President actively supports the program and provides assistance whenever it is needed, making leadership aware of the program and requesting their cooperation and assistance. The identity of the Affirmative Action Officer appears on internal and external communications regarding OHIO’s Equal Employment Opportunity Policy and Affirmative Action Policy.

With regard to the University’s AAP, President Roderick McDavis supports the Affirmative Action Officer in the implementation of programs that are specific to OHIO. Dianne Bouvier and the Office for Institutional Equity, together with the University Human Resources staff, have primary responsibility for implementing programs at OHIO.

The duties of the Affirmative Action Officer and designees include:

- Developing policy statements, AAPs, and internal and external modes of communication
- Overseeing discussions with local managers, supervisors, and employees to ensure OHIO’s policies are being followed
- Training personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes to ensure the commitments in OHIO’s affirmative action program are implemented
- Training supervisors on OHIO’s policies prohibiting discrimination and harassment
- Identifying any barriers to employment for individuals with known disabilities and assisting managers in developing possible reasonable accommodations to ensure that individuals with disabilities benefit from equal employment opportunities
- Serving as liaison between OHIO and enforcement agencies, and between OHIO and organizations of and for persons with disabilities
- Encouraging active involvement by Ohio University representatives in the community service programs of local organizations of and for persons with disabilities
- Ensuring posters and notices are properly displayed or disseminated in ways that are accessible and understandable to applicants and employees, and keeping management informed of developments in the affirmative action area.

The responsibilities of managers and supervisors under this AAP include:

- Taking action to prevent the discrimination and harassment of employees
- Ensuring OHIO departments fully comply with the spirit and letter of the affirmative action program and policies
- Assuring that search committees review the qualifications of all applications during the hiring process, and that OIE reviews all applications for finalists within the process to make sure qualified individuals are treated in a nondiscriminatory manner with regard to hire, promotion, transfer and
termination

- Working with the Affirmative Action Officer or Chief Human Resources Officer and qualified employees or applicants with disabilities to determine appropriate reasonable accommodations if they are necessary for performance of the job and/or the recruitment process.
Request for Self-Identification  
41 C.F.R. 60-741.42

In order to notify applicants and employees of the existence of and the opportunity to participate in this affirmative action program and to provide sufficient data to allow Ohio University to measure and improve, if necessary, the effectiveness of OHIO's affirmative action efforts, Ohio University encourages applicants and employees to complete an invitation to self-identify as a person with a disability as follows:

1. When an applicant applies or is considered for employment, OHIO provides the applicant with a copy of the form attached as Exhibit A, at the same time OHIO invites the applicant to self-identify race, ethnicity, sex, and disability status.

2. Following an offer of employment, but before the individual begins his/her job duties, OHIO provides an additional copy of the form attached as Exhibit A.

3. Recognizing an individual's status regarding disability may change over time and/or an employee may feel more comfortable disclosing an existing disability after being employed for a period of time, OHIO also sends a copy of the form attached as Exhibit A to all employees at least once every five years. In addition, OHIO posts a copy of the Invitation to Self-Identify and at least once during the five-year intervals between workplace surveys, sends a written reminder to employees that they may voluntarily update their disability status. On September 15, 2014, University Human Resources sent out an invitation to employees to self-identify.

OHIO keeps all self-identification information confidential and maintains it in a data analysis file rather than in individual employee personnel or medical files.
Review of Personnel Processes
41 C.F.R. 60-741.44(b)

Ohio University periodically reviews its personnel procedures to determine whether they ensure the careful, thorough, and systematic consideration of the job qualifications of employees or applicants with known disabilities for jobs filled either through vacancy or promotion and for educational or training opportunities. OHIO ensures that its personnel processes facilitate the implementation of the affirmative action program.

Vacancies are advertised, and applications are accepted from any interested person. Ohio University's employment application, the careers section of its website, and all advertisements include a nondiscrimination statement to further assure applicants of OHIO's policy of equal employment opportunity. An EEO statement will be included in other recruitment literature should OHIO use such documents in the future. All nonexecutive positions lasting three days or more not expected to be filled from within will be referred to the appropriate state employment service delivery system. In addition, to ensure qualified individuals with disabilities are aware of openings, OHIO will send vacancy announcements to selected sources listed in the Outreach, Positive Recruitment, and External Dissemination of Policy section of this Affirmative Action Program.

The disability of any otherwise qualified individual who applies for any vacancy, promotion, transfer, or training opportunity will not be a factor in employment decisions. OHIO periodically reviews any physical and mental job qualifications to ensure they do not tend to screen out individuals with disabilities for reasons that are not job related or consistent with business necessity, or do not relate to ensuring the safe performance of the essential functions of the job. OHIO makes any necessary modifications to ensure applicants and employees receive equal opportunity in the operation of our personnel processes, and that persons with disabilities are not stereotyped in a manner that limits their access to jobs for which they are qualified.

OHIO also ensures applicants and employees with disabilities who meet job qualifications have equal access to its personnel process, including those implemented through information and communication technologies, and provides necessary reasonable accommodation to ensure that applicants and employees with disabilities receive equal opportunity in the operation of personnel processes. Finally, OHIO makes sure its personnel processes do not limit, segregate, or classify an employee or job applicant in a way that adversely affects employment opportunities or status on the basis of disability.
Review of Physical and Mental Job Requirements
41 C.F.R. 60-741.44(c)

Ohio University reviews physical and mental job qualification requirements as job qualification requirements are established or revised to ensure qualification requirements do not screen out qualified individuals with disabilities or qualified disabled veterans for reasons that are not job related or consistent with business necessity and the safe performance of the essential functions of the job. This review occurs at regular intervals throughout each calendar year, such as when a job may be created or when the duties of a position are significantly revised, and when considering requests for reasonable accommodation related to the performance of the functions of a position.

Ohio University also regularly reviews its personnel processes to ensure any medical exams or inquiries are conducted in accordance with the Section 503 regulations. Information regarding the medical condition or history of an individual obtained as a result of any such inquiry or exam is collected and maintained on separate forms and in separated medical files and treated as a confidential medical record.

To the extent any physical or mental job qualification measurements are found to potentially screen out qualified individuals with disabilities or qualified disabled veterans in the selection of employees or applicants for employment or in other changes in employment status, such as promotion or training, Ohio University will ensure the requirements are related to the specific job for which the individual is being considered and are consistent with business necessity and the safe performance of the job.
Ohio University has made and will continue to make reasonable accommodations, which do not impose undue hardships on its business, to the known physical and mental limitations of otherwise qualified employees and job applicants.

Included among the specific accommodations for qualified individuals with disabilities that have been implemented are the following:

1. Short- and long-term disability programs provide pay for eligible employees absent due to disability.

2. A personal leave policy enables eligible employees to accumulate sick time to be used for medical appointments or personal illness.

3. A medical leave of absence is available to any employee who provides medical documentation of disability, where the requested absence constitutes a reasonable accommodation.

4. Adaptive equipment, such as supportive desk chairs, special computer monitors and/or keyboards, is made available when necessary to enable an employee to perform an essential job function.

5. Should reasonable accommodations be necessary to facilitate access to work areas by qualified employees or applicants with known disabilities, OHIO will take reasonable steps to provide such accommodations.

6. If necessary to accommodate a disability, OHIO will redesign jobs to eliminate nonessential functions, unless the redesign creates an undue hardship.

7. OHIO will arrange suitable work hours for employees returning from sick leave, leave of absence, and long-term disability where that arrangement constitutes a reasonable accommodation.

8. OHIO will accommodate employees with disabilities by allowing a reasonable amount of time off for physicians' visits.

9. Designated accessible parking for individuals with disabilities is available at Ohio University.

10. OHIO's online application system makes clear to all applicants that if they are unable to fully use the automated system, they may follow specified alternate procedures so that they receive equal opportunity to apply for and be fully considered for all jobs.

11. OHIO has designed its online application system and its internal information and communication technologies to increase the accessibility of those systems.

If an individual has a disability, OHIO encourages the individual to tell us about (i) any special methods, skills, and procedures which qualify him or her for positions which he or she might not otherwise be able to do, so that he or she can be considered for any position of that kind, and (ii) the reasonable accommodations which would enable the individual to perform the job properly and safely. Such accommodations may include special equipment, changes in the physical layout of the job, elimination of certain nonessential duties related to the job, or other reasonable accommodations.
OHIO informs employees and applicants of its desire to discuss reasonable accommodations in various ways, including through our Policy Statement and on the Invitation to Self-identify. Both the Policy Statement and the Invitation to Self-identify are provided to employees and applicants, and posted for to employees. Individuals interested in discussing accommodations may contact Dianne Bouvier, Interim Executive Director, Office for Institutional Equity, the Human Resources Department, and/or the individual's supervisor. Managers and supervisors are trained to ensure that they know what to do if an employee or applicant makes a request for a reasonable accommodation so that such requests are processed swiftly.

Where an employee with a known disability is having significant difficulty performing their job and OHIO reasonably concludes that the performance issues may be related to the known disability, OHIO may notify the employee of the performance problem and confidentially inquire whether the problem is related to the employee's disability. If the employee indicates that their disability is impacting performance, OHIO will engage in confidential discussions with the employee regarding whether the employee requires reasonable accommodations to improve performance.
Compensation
41 C.F.R. 60-741.21(a)(9)

In offering employment or promotions, Ohio University does not reduce the amount of compensation offered to individuals with disabilities because of any disability income, pension, or other benefit the employee receives from another source. Similarly, OHIO does not reduce the amount of compensation offered to an employee or applicant because of the actual or anticipated cost of a reasonable accommodation needed, requested, or anticipated.
Internal Grievance Procedure

Ohio University Policy 03.003 Americans with Disabilities Act Compliance includes a grievance procedure for reviewing decisions where a reasonable accommodation has been denied or where there is alleged discrimination or harassment based on disability.

REVIEW OF DECISIONS TO DENY REQUESTED ACCOMMODATION

In the event that a reasonable accommodation cannot be agreed upon, individuals may seek review of a unit's decision to deny implementation of a requested accommodation.

1. In regards to education: review of decisions to deny requests for accommodation in an educational program or activity may be made to the University ADA/504 Coordinator, who will review and attempt to resolve the dispute informally and in consideration of the situation in its entirety. If an informal resolution is not possible, the ADA/504 Coordinator shall render a final written decision in regards to the reasonableness of the accommodation under the circumstances.

2. In regards to employment: review of decisions to deny requests for accommodation in the application process or workplace may be made to the University ADA/504 Coordinator, who will attempt to resolve the dispute informally. In the event that an informal resolution is not possible, the ADA/504 Coordinator shall render a final written decision in regards to the reasonableness of the accommodation under the circumstances.

3. Final Review: Students, Employees, and Planning Units may seek review of a final determination of reasonable accommodation by the ADA/504 Coordinator to the Executive Vice President and Provost within five business days of the decision.

Although the preferred accommodation will be provided where reasonable, planning units may provide reasonable alternative accommodation where appropriate. Federal disability law requires that any accommodation be evaluated in light of the total resources and function of the University and not simply from a given department's resources or function.

PROCESS TO FILE DISCRIMINATION/HARASSMENT COMPLAINT

Individuals who believe that they have been discriminated against in any educational program or activity or employment situation at Ohio University on the basis of having a disability, a record of disability, being regarded as disabled, or having association or affiliation with a person who has a disability, may file complaint with the Office for Institutional Equity pursuant Equal Employment and Educational Opportunity Policy 40.001.
Harassment
41 C.F.R. 60-741.44(e)

Ohio University has developed and implemented policies and procedures to ensure employees who are individuals with disabilities are not harassed because of their disability status.

A copy of OHIO's Equal Employment and Educational Opportunity (Policy 40.001), Americans with Disabilities Compliance (Policy 03.003) and Affirmative Action Policy Statement forbidding harassment against individuals based on protected characteristics can be found www.ohio.edu/equity.
OHIO trains personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes to ensure the commitments in OHIO's AAP are implemented.
Internal Dissemination of Policy
41 C.F.R. 60-741.44(g)

OHIO recognizes that, however strong its outreach program, internal support from supervisory management and other employees is necessary to ensure maximum effectiveness of its AAP for individuals with disabilities. So that these employees' awareness of the needs of individuals with disabilities can be increased and employee participation in the program is increased, OHIO will utilize the following procedures to maximize the internal implementation and dissemination of its Equal Employment and Educational Opportunity Policy and Affirmative Action Policy:

1. Ohio University's policy on equal employment and educational opportunity and affirmative action for persons with disabilities is posted on OHIO's bulletin boards.

2. OHIO's policy 03.006 on Whistleblowing and Retaliation prohibits retaliation against an employee who engages in a grievance process, including those who are persons with disabilities, "with the intent or effect of adversely affecting the terms or conditions of employment or enrollment."

3. OHIO posts the policies in electronic format in a conspicuous location on OHIO intranet, along with other employment forms, and otherwise ensures all of its personnel have a copy of or the ability to view the policy.

4. OHIO's electronic applicant process includes information about OHIO's commitment to equal opportunity and affirmative action.

5. OHIO will communicate to employees its obligation to take affirmative action to employ qualified individuals with disabilities and will encourage employee referral of covered applicants.

6. Meetings with executive management and supervisory personnel will be conducted at least annually to explain OHIO's policy of affirmative action, to make clear the University's support for the policy, and to impart to these personnel their responsibility in making the AAP a success.

7. An invitation to self-identify for the purpose of meeting Ohio University's affirmative action obligations is disseminated to all applicants, as well as to all employees once OHIO has extended a job offer, but before beginning employment duties. In addition, in recognition that an individual's disability status may change and/or that employees may feel more comfortable disclosing an existing disability after a period of time at OHIO, OHIO posts a copy of the invitation to participate in the affirmative action program and distributes the invitation to all current employees at least once every five years.

8. When applicable, Ohio University publicizes the policy in Ohio University publications.

9. The policy is discussed in both new employee orientation and management training programs.

10. When applicable, Ohio University publications include articles on accomplishments of all employees, including persons living with disabilities.

As a party to collective bargaining agreements, union officials will be informed that OHIO is bound by the terms of the Rehabilitation Act of 1973, as amended, and is committed to take affirmative action to employ and advance in employment persons with disabilities, and OHIO will not discriminate against individuals with physical or mental disabilities.
Ohio University has reviewed its employment practices to determine whether its personnel programs are designed to effectively recruit and advance in employment qualified individuals with disabilities. While OHIO believes there are no deficiencies in its current employment practices with respect to applicants and employees with disabilities, it engages in outreach, positive recruitment, and external dissemination programs to augment its existing affirmative efforts. For example, OHIO sends written notification of its affirmative action policy to all subcontractors, including subcontracting vendors and suppliers, and requests appropriate action on their part. In addition, OHIO engages in or has made plans to implement the following activities:

1. Executives, management officials, supervisors, and other employees of OHIO are encouraged to assist in the effort to disseminate Ohio University's policy of affirmative action to appropriate individuals outside of OHIO.

2. OHIO will inform recruiting sources of Ohio University's policy of affirmative action for individuals with disabilities. Recruiting sources will be requested to actively recruit and refer qualified individuals with disabilities for all positions.

3. Ohio University makes the Equal Employment Opportunity Clause part of all covered contracts and purchase orders.

4. Ohio University will identify local organizations and/or community agencies known to specialize placing and/or developing training programs for individuals with disabilities and send them notices of vacant positions. Examples of these outreach efforts include contacting the following:

   A. State Vocational Rehabilitation Service agencies, mental health agencies, and/or developmental disabilities agencies in the states covered by this AAP
   
   B. Employment One-Stop Career Centers in the states covered by this AAP
   
   C. Department of Veterans Affairs offices close to the facilities covered in this AAP
   
   D. Private recruitment sources, such as professional organizations or employment placement services that specialize in placement of individuals with disabilities

5. When appropriate, Ohio University will include disabled individuals when employees are pictured in consumer and personnel recruitment advertising.

6. Ohio University makes reasonable accommodations for qualified individuals with disabilities.

7. Ohio University advertisements or solicitations for prospective employees indicate that Ohio University is an equal opportunity employer.
Data Collection Analysis
41 C.F.R. 60-741.44(k)

Ohio University documents computations or comparisons pertaining to applicants and hires on an annual basis and maintains the documentation for a period of three years. A copy of our data collection analysis for the period of November 01, 2013 to October 31, 2014 follows:
Utilization Analysis
41 C.F.R. 60-741.45

Ohio University has compared the representation of employees with known disabilities in each job group with the utilization goal identified by Office of Federal Contract Compliance Programs in effect at the start of this Affirmative Action Program year. In conducting this analysis, the following principles apply:

1. The purpose of the utilization goal established by OFCCP is to provide a benchmark against which OHIO may measure the representation of individuals with disabilities in its workforce.

2. OFCCP believes the utilization goal serves as an equal employment opportunity objective that should be attainable through the use of the affirmative action measures included in this Affirmative Action Program.

3. The utilization goal is not a quota that must be met, nor is it to be considered as a ceiling that limits or restricts the employment of individuals with disabilities.

4. In all employment decisions, OHIO makes selections in a nondiscriminatory manner. Utilization goals do not provide a justification to extend a preference to any individual, select an individual, or adversely affect an individual's employment status, on the basis of that individual's disability status.

5. Utilization goals do not create set-asides for specific groups, nor are they intended to achieve proportional representation or equal results.

6. Utilization goals are not used to supersede merit selection principles, nor do these utilization goals require OHIO to hire a person who lacks qualifications to perform the job successfully or hire a less qualified person in preference to a more qualified one.

7. A finding that the utilization goal has not been attained in one or more job groups does not constitute either a finding or admission of discrimination.

A copy of our utilization analysis as of October 31, 2014 follows:
**Ohio University**
November 1, 2014 Annual Affirmative Action Plan

**Individuals with Disabilities Data Collection Analysis**
For Period: 11/1/2013 to 10/31/2014

<table>
<thead>
<tr>
<th>Description</th>
<th>Total</th>
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</tr>
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<td>Number of Jobs Filled</td>
<td>1427</td>
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<td>Number of IWD Hires</td>
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</tr>
<tr>
<td>Number of Hired Applicants</td>
<td>1427</td>
</tr>
</tbody>
</table>

Confidential - Not subject to inspection by employees or applicants under 41 CFR Section 60-741.41.
Identification of Problem Areas
41 C.F.R. 60-741.45(e)

When the Utilization Analysis conducted in accordance with the regulations indicates the representation of individuals with known disabilities is less than the current goal identified by OFCCP, OHIO will take steps to assess whether and where impediments to equal employment opportunity exist, including the following, as appropriate:

1. Sources which have provided limited qualified candidates will be reviewed, and the Affirmative Action Officer will identify actions which may increase the number of qualified applicants received.

2. The Affirmative Action Officer will review positions or job groups that require specialized skill sets or physical requirements.

3. Our affirmative action program audit will be reviewed.

4. The Affirmative Action Officer will review our personnel processes to ensure the careful, thorough, and systematic consideration of the job qualifications of applicants and employees with known disabilities and that no barriers to equal employment opportunities exist.

Based on this analysis, we have developed and will execute the action-oriented programs described in this AAP.
Development and Execution of Action-Oriented Programs
41 C.F.R.
60-741.45(f)

To demonstrate our good faith efforts to expand employment opportunities for individuals with disabilities and to produce measurable results, OHIO developed and executed the following action-oriented programs, as appropriate:

1. OHIO will continue to analyze all positions and prepare written descriptions to accurately reflect position functions and to ensure any physical or mental requirements are job related and consistent with business necessity.

2. Job descriptions will continue to be reviewed to determine the knowledge, skills, abilities, and other requirements necessary for the adequate performance of the job. Specifications will continue to be consistent for the same job title and will not contain any requirements that would result in discrimination on the basis of sex, gender identity, sexual orientation, race, color, religious creed, national origin, physical or mental disability, and/or protected veteran status, or any other characteristic protected by law.

3. Job descriptions are available to incumbents and all members of management involved in the recruiting, screening, selection, and promotion process. Job descriptions are also made available to employees, applicants, and recruiting sources as appropriate.

4. OHIO has carefully evaluated the total selection process and found it to be free from discrimination:
   A. We have instructed supervisory personnel to ensure elimination of discrimination in personnel actions in which they are involved.
   B. Application forms do not contain questions with potential discriminatory effects.
   C. All parts of the selection process are free from stereotyping of individuals with disabilities in a manner that limits their access to jobs for which they are qualified.
   D. OHIO does not and will not use any selection techniques that can be improperly used to discriminate against individuals with disabilities.

5. OHIO has evaluated its techniques for improving recruitment and increasing the flow of qualified applicants with disabilities through the following:
   A. All employees are actively encouraged to refer applicants to OHIO.
   B. OHIO lists all required positions with www.careers.ohio.gov.
   C. OHIO provides copies of policies to inform new employees of their equal employment rights and responsibilities, right to request reasonable accommodation, promotional opportunities, and ways to alleviate any problems that might arise.
   D. OHIO identifies alternative or additional outreach and recruitment efforts to increase recruitment of individuals with disabilities.

6. OHIO has implemented the following programs and procedures to ensure employees with disabilities are given equal opportunities for promotion:
   A. On-the-job training is provided to all qualified employees to assist them in developing the
necessary knowledge and skills for promotion to higher-level jobs. In addition, a tuition reimbursement benefit is available to all qualified employees.

B. OHIO utilizes a formal performance evaluation program for all employees. Management and supervisors are offered training on the basic methodology of performance evaluation.

C. Employees with known disabilities are not required to possess higher qualifications than those of the lowest qualified incumbent in the job for which they apply.

D. OHIO utilizes seniority practices for its AFSME bargaining unit employment practices which are consistently applied. Other employment opportunities do not follow a formal seniority system. Promotions are based on merit selection principles.

E. We will continue to make opportunities for advancement widely known through our internal posting process which encourages all employees, including employees with disabilities, to apply for any open position for which they are qualified with or without reasonable accommodation.

7. We have assessed our personnel processes, and have concluded our personnel processes continue to ensure the careful, thorough, and systematic consideration of the job qualifications of applicants and employees with known disabilities and that no barriers to employment exist.
It is the responsibility of OHIO's Affirmative Action Officer to monitor all employment and personnel practices to ensure compliance with applicable regulations and adherence to OHIO's Affirmative Action Policy, to report specific problems to the appropriate management personnel, and to measure the effectiveness of Ohio University's AAP.

OHIO's audit and reporting system is designed and implemented to:

- Measure the effectiveness of the AAP
- Identify any need for remedial action
- Determine the degree to which OHIO's objectives are being attained
- Determine whether individuals with known disabilities have had the full opportunity to equal employment and to participate in all OHIO sponsored educational, training, recreational and social activities, and
- Measure OHIO's compliance with the AAP's specific obligations.
- Document the actions taken to monitor OHIO's compliance with the AAP's specific obligations.

In order to measure the effectiveness of the AAP, OHIO may take the following actions:

- Audit its voluntary self-identification process to monitor the number of individuals with disabilities who choose to self-identify and evaluates whether changes could be made to Public University's self-identification process to encourage greater voluntary self-identification by individuals with disabilities
- Examine its utilization of individuals with disabilities and develop action-oriented programs to address any areas of underutilization
- Review available data computations and analyses regarding applicants and hires
- Review the effectiveness of OHIO's recruitment and outreach activities
- Regularly assess OHIO's personnel processes to ensure that individuals with disabilities have equal opportunity in employment
- Use a schedule to regularly assesses any mental and physical qualifications to ensure that they are job-related and consistent with business necessity
- Audit OHIO's communications with vendors and subcontractors to ensure that such communications reflect OHIO's commitment to equal employment opportunity and affirmative action for individuals with disabilities
- Audit OHIO's communications with applicants and employees to ensure that such communications reflect OHIO's commitment to equal employment opportunity and affirmative action for individuals with disabilities
- Audit OHIO's job listings to ensure that the postings reflect OHIO's commitment to equal employment opportunity and affirmative action for individuals with disabilities
<table>
<thead>
<tr>
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## Individuals with Disabilities Utilization Goals

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### Individuals with Disabilities Utilization Goals

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<th>Total Emp</th>
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<table>
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<th>Upper Service and Maintenance</th>
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Confidential - Not subject to Inspection by employees or applicants under 41 CFR Section 60-741.41.
• Audit OHIO's personnel policies to ensure that such policies reflect Ohio University's commitment to equal employment opportunity and affirmative action for individuals with disabilities

Where the affirmative action program is found to be deficient, OHIO shall endeavor to undertake necessary action to bring the program into compliance.
List of Exhibits

Exhibit A – Invitation to Self-Identify for Individuals with Disabilities

Exhibit B – Reasonable Accommodation Policy and Procedures

Exhibit C – Annual Assessment of Outreach and Recruitment Efforts
Exhibit A-
Voluntary Self-Identification of Disability

Why are you being asked to complete this form?

Because we do business with the government, we must reach out to, hire, and provide equal opportunity to qualified people with disabilities. To help us measure how well we are doing, we are asking you to tell us if you have a disability or if you ever had a disability. Completing this form is voluntary, but we hope that you will choose to fill it out. If you are applying for a job, any answer you give will be kept private and will not be used against you in any way.

If you already work for us, your answer will not be used against you in any way. Because a person may become disabled at any time, we are required to ask all of our employees to update their information every five years. You may voluntarily self-identify as having a disability on this form without fear of any punishment because you did not identify as having a disability earlier.

How do I know if I have a disability?

You are considered to have a disability if you have a physical or mental impairment or medical condition that substantially limits a major life activity, or if you have a history or record of such an impairment or medical condition.

Disabilities include, but are not limited to:

- Blindness
- Autism
- Bipolar disorder
- Post-traumatic stress disorder (PTSD)
- Deafness
- Cerebral palsy
- Major depression
- Obsessive compulsive disorder
- Cancer
- HIV/AIDS
- Multiple sclerosis (MS)
- Impairments requiring the use of a wheelchair
- Diabetes
- Schizophrenia
- Missing limbs or
- Intellectual disability (previously called mental
  partially missing limbs
  retardation)
- Epilepsy
- Muscular dystrophy

Please check one of the boxes below:

☐ YES, I HAVE A DISABILITY (or previously had a disability)

☐ NO, I DON'T HAVE A DISABILITY

☐ I DON'T WISH TO ANSWER

__________________________________________  __________________________
Your Name                                      Today's Date
Federal law requires employers to provide reasonable accommodation to qualified individuals with disabilities. Please tell us if you require a reasonable accommodation to apply for a job or to perform your job. Examples of reasonable accommodation include making a change to the application process or work procedures, providing documents in an alternate format, using a sign language interpreter, or using specialized equipment.

\footnote{Section 503 of the Rehabilitation Act of 1973, as amended. For more information about this form or the equal employment obligations of Federal contractors, visit the U.S. Department of Labor's Office of Federal Contract Compliance Programs (OFCCP) website at www.dol.gov/ofccp.}

PUBLIC BURDEN STATEMENT: According to the Paperwork Reduction Act of 1995 no persons are required to respond to a collection of information unless such collection displays a valid OMB control number. This survey should take about 5 minutes to complete.
Exhibit B – Reasonable Accommodation Policy and Procedures

The Ohio University's policy is to fully comply with the reasonable accommodation requirements of the Americans with Disabilities Act and other applicable federal, state and local laws. Ohio University is committed to providing reasonable accommodations to qualified individuals with known disabilities to enable them to perform the essential functions of the position held or desired, to participate in the application process or to enjoy equal benefits and privileges of employment as are enjoyed by employees without disabilities. To obtain a reasonable accommodation, an applicant or employee should inform Ohio University of the existence of a disability, the disability related imitation(s) or workplace barrier(s) that need to be accommodated, and, if known, the desired reasonable accommodation.

Requests for Reasonable Accommodation

A request for reasonable accommodation may be oral or written. All requests for reasonable accommodation should be submitted to the Office for Institutional Equity (OIE), University Human Resources or to the employee's supervisor. For recordkeeping purposes, OHIO requires that all employees requesting reasonable accommodations complete and return an accommodation request form to OIE. The processing of requests will not be delayed while an employee completes these forms.

Ohio University may request and review reasonable documentation, including medical documentation, in support of a request for reasonable accommodation. Documentation will be requested if the disability and need for accommodation is not obvious, where sufficient information regarding the disability and need for accommodation has not been provided, to confirm that a reasonable accommodation is medically appropriate, or to identify alternative accommodations that may be sufficient. Any request for medical documentation will be specific and limited to documentation of the individual's disability, its expected duration, the functional limitations for which reasonable accommodation is sought, and information about medically appropriate accommodations.

Requests for accommodation will be considered on a case-by-case basis and as expeditiously as possible. OHIO is not required to provide an employee's requested accommodation and reserves the right to provide an alternative accommodation that is equally effective. A requested accommodation may be rejected when not required by law, such as when, for example, it would impose an undue hardship on OHIO, or if it would not be sufficient (or not necessary) to enable the employee to perform the essential functions of the job.

Confidentiality of Medical Information

All requests for reasonable accommodation, related documentation and any medical or disability related information provided to OHIO will be treated as confidential medical records and maintained in a separate file by OIE. Individuals who have access to this information may not disclose it, except as follows:

- Managers and supervisors who need to know may be told about any necessary work restrictions and accommodation(s)
- Government officials may be given information necessary to investigate the Ohio University’s compliance with applicable law
• The information may be disclosed to workers' compensation or insurance carriers in certain circumstances

• Emergency or first aid personnel may be given access to the information when medically necessary; and

• Ohio University employees may be provided the information for record-keeping or affirmative action purposes or to evaluate OHIO's processing of reasonable accommodation requests

Employees who fail to maintain the confidentiality of the medical records or information of other employees will be subject to disciplinary action, up to and including termination of employment.

Internal Review of Decisions Denying Reasonable Accommodations

Employees may request that any decision to deny a request for reasonable accommodation be informally reviewed, following procedures outlined in the Ohio University American with Disabilities Act Compliance policy 03.003. To request reconsideration, employees should submit a written request to Dianne Bouvier, Interim Executive Director and ADA/504 Coordinator, in the Office for Institutional Equity. The request should explain the reasons the employee believes the request should be granted.
Exhibit C – Annual Assessment of Outreach and Recruiting Efforts

Ohio University evaluates available data regarding the effectiveness of its outreach and recruitment efforts on an annual basis. For areas where OHIO concludes the totality of its efforts were not effective in identifying and recruiting qualified individuals with disabilities, Ohio University will identify and implement alternative efforts.

Criteria used to evaluate the effectiveness of outreach efforts may include:

- Results of utilization analysis for individuals with disabilities
- Available data related to applicant and hires
- Whether the activity increased OHIO's ability to include individuals with disabilities in its workforce
- Whether the activity attracted qualified individuals with disabilities
- Whether the activity resulted in the selection of qualified individuals with disabilities

OHIO will continue to monitor and review outreach sources to evaluate the effectiveness of outreach and recruitment efforts.