



Affirmative Action Program for Minorities and Women



Montana State University Bozeman, MT

January 1, 2023, through December 31, 2023, Plan Year



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I. Introduction

Montana State University Bozeman sets forth this Affirmative Action Plan (AAP) for the period of January 1, 2023, through December 31, 2023, reaffirming its commitment to the spirit and letter of affirmative action law, including those administered by the U. S. Department of Labor’s Office of Federal Contract Compliance Programs (OFCCP). Through this plan's implementation, MSU Bozeman continues its efforts to comply with appropriate government regulations and to make the best possible use of personnel while contributing to the betterment of society and the community.

A. MSU Bozeman Profile

Mission Statement

As the state’s land-grant university, Montana State integrates education, creation of knowledge and art and service to communities.

Vision

Montana State University will transform lives and communities in the people’s interest.

Values

Excellence

We pursue exceptional outcomes.

Integrity

We commit to honesty, ethical behavior, and accountability.

Inclusion

We create a civil, supportive, and respectful environment where difference and diversity are sources of strength.

Collaboration

We believe that working together produces better outcomes.

Curiosity

We expect inquiry, exploration, creativity, and innovation.

Stewardship

We care for and conserve the human, economic, physical, and environmental resources entrusted to us.

Please visit <https://www.montana.edu/strategicplan/mission.html> for more information regarding MSU Bozeman and the MSU Strategic Plan.



B. History and Background of MSU Bozeman and Its Commitment to Equal Opportunity and Affirmative Action

MSU Bozeman is a unit of the Montana University System and is the land-grant University of the State of Montana. Under the 1972 revision of the Montana Constitution, the governance and control of the Montana University System is vested in the Board of Regents of Higher Education which has full power, responsibility, and authority to control the higher education system. The Board of Regents (Regents or BOR) has the responsibility for coordinating the delivery of publicly supported post-secondary education in Montana.

Accordingly, the Regents, with the Commissioner of Higher Education, sets the role and scope of each campus in the system, determines statewide educational needs, and provides leadership and support in meeting those needs.

Effective July 1, 1994, the Board of Regents combined units and created two universities of the Montana University System: The University of Montana and MSU Bozeman. The campuses of Montana State University are MSU Bozeman (Flagship Campus in Bozeman), MSU Bozeman Billings, MSU Bozeman-Northern, and Great Falls College MSU. At present, each of these units is responsible for developing and implementing its own Affirmative Action Plan (AA Plan or Plan). This is the Affirmative Action Plan for MSU Bozeman, Gallatin College and the Extension Service and the Montana Agricultural Experiment Station agencies.

Founded in 1893 as Montana State College, Montana State University Bozeman has become a comprehensive post-secondary educational institution with an enrollment of over 16,900 students and a total workforce of approximately 3,503 including tenurable and non-tenurable academic faculty, University executives and administrators, contract professional, classified FLSA exempt and non-exempt employees working in MSU Extension offices, Agricultural Research Centers, and Extended Nursing campuses across the state. MSU Bozeman offers a broad range of professional certificates and associate, baccalaureate, and graduate degrees.

a. Human Rights and Commitments of the state of Montana

The Constitution of the State of Montana speaks directly to the equal opportunity and affirmative action commitments of the University:

We the people of Montana grateful to God for the quiet beauty of our state, the grandeur of our mountains, the vastness of our rolling plains, and desiring to improve the quality of life, equality of opportunity and to secure the blessings of liberty for this and future generations do ordain and establish this constitution.

Section 4. Individual dignity continues:

The dignity of the human being is inviolable. No person shall be denied the equal protection of the laws. Neither the state nor any person, firm, corporation, or institution shall discriminate against any person in the exercise of his civil or political rights on account of race, color, sex, culture, social origin, or condition, or political or religious ideas.

Section 35 speaks directly to the state's obligations to those who have served in the Armed Forces:



The people declare that Montana servicemen, servicewomen, and veterans may be given special considerations determined by the legislature.

Finally, **Article X, Section 1** states the duties of the University as an educational provider:

Section 1. Educational goals and duties. (1) *It is the goal of the people to establish a system of education which will develop the full educational potential of each person. Equality of educational opportunity is guaranteed to each person of the state.* (2) *The state recognizes the distinct and unique cultural heritage of the American Indians and is committed in its educational goals to the preservation of their cultural integrity. (Emphasis added.)*

b. Non-Discrimination Policies of the Board of Regents and MSU Bozeman

The Non-Discrimination Policies and Discrimination Grievance Procedures is the document that codifies the University's commitment to equal opportunity and affirmative action. These policies have been revised numerous times since they were first written in 1976 in order to reflect changes in state and federal law and Regents policy. The most recent revision is available on the University's home page at: <http://www.montana.edu/equity/policies/index.html>.

c. History of Affirmative Action at the University

In 1975, several faculty women filed a complaint of sex discrimination against the University and the Regents. In February 1976, Federal Judge W.D. Murray found the University "guilty of sex discrimination in four specific cases and in a class action involving all female faculty working at MSU in 1976 and the three preceding years." The university prepared a Master Plan which was approved by the court which resulted in:

1. Improvement of the Affirmative Action Plan,
2. Inclusion of females in the decision-making apparatus of the University,
3. Correction of promotion and tenure criteria and policy to eliminate built-in sex discrimination, and
4. Correction of equal pay violations and payment of damages for past pay and promotion inequities.

All reports or any concerns about conduct that may be discriminatory, may violate the University's policies against discrimination and harassment, and/or conduct that may be retaliatory should be reported to the Office of Institutional Equity.

The University's Title IX Coordinator is:

Kyleen Breslin – Managing Director/Title IX Coordinator

Campus Civil Rights
311 Montana Hall
Montana State University
P.O. Box 172430
Bozeman, MT 59717-2430

Tel: (406) 994-1568

E-mail: civilrights@montana.edu

Web: <http://www.montana.edu/civilrights>

II. Reaffirming Commitment to Equal Employment Opportunity

MSU is committed to equal employment opportunity for all employees and applicants in all terms and conditions of employment and will actively carry out all Federal and state regulations and executive orders.

Waded Cruzado, President of MSU Bozeman, has designated the Chief Human Resource Officer (CHRO) as the Equal Employment Opportunity Administrator (EEO Administrator). The CHRO oversees the plan development, modification, implementation, and reporting requirements and conducts management updates. The EEO Administrator also assures that the university periodically examines its selection process to further the principles of equal employment opportunity.

MSU Bozeman is committed to equality of opportunity in all aspects of employment, including the recruitment, selection, training, compensation, benefits, discipline, promotion, transfer, layoff and termination, and that such activities are free of illegal discrimination based upon race, color, national origin (ancestry), sex, sexual preference/orientation, gender identity, gender expression, transgender, marital or parental status, age, creed, religion or political beliefs, mental or physical disability, genetic information or status as a veteran. Further, in accordance with Section 86.9 of the regulations implementing Title IX of the Education Amendments of 1972 ("Title IX"), it is the policy of MSU Bozeman not to discriminate on the basis of sex in admission to any education program or activity administered by this institution. This policy extends to employment, admission, and access to programs and activities. Also, in accordance with Titles VI and VII of the Civil Rights Act of 1964 (respectively, "Title VI" and "Title VII") and other applicable state and local laws, it is the policy of MSU Bozeman not to discriminate on the basis of race, color, religion, national origin, creed, service in the uniformed services (as defined in state and federal law), veteran's status, sex, age, political ideas, marital or family status, pregnancy, physical or mental disability, genetic information, gender identity, gender expression, or sexual orientation to any education program or activity administered by this institution or in any aspect of employment.



A. Internal Dissemination of EEO Policy 41 C.F.R. § 60-1.42

MSU Bozeman posts equal employment opportunity notices that comply with 41 C.F.R. § 60-1.42(a) in conspicuous places (including websites) available to employees, applicants for employment, and representatives of each labor union which represents MSU Bozeman employees.

B. External Dissemination of EEO Policy 41 C.F.R. § 60-1.41; 41 C.F.R. § 60-1.5

1. In solicitations or advertisements for employees placed by or on its behalf, MSU Bozeman complies with the following method regarding the dissemination of its equal employment opportunity clause:

a. MSU Bozeman states expressly in the solicitations or advertising that all qualified applicants will receive consideration for employment without regard to race, color, national origin (ancestry), sex, sexual preference/orientation, gender identity, gender expression, transgender, marital or parental status, age, creed, religion or political beliefs, mental or physical disability, genetic information or status as a veteran. 41 C.F.R. § 1.41(a). When pictures are included in these media, where feasible, efforts will be made to include pictures of individuals of diverse sex, race, and national origin.

2. In addition, MSU Bozeman incorporates by reference the equal employment opportunity and affirmative action clauses into each of its covered Government contracts and subcontracts, including Government bills of lading, transportation requests, contracts for deposit of Government funds, and contracts for issuing and paying U.S. savings bonds and notes and such other contracts and subcontracts as required by law, purchase orders, lease agreements, Government contracts, and other covered contracts (and modifications thereof if not included in the original contract) in accordance with 41 C.F.R. § 60-1.4 (a) – (c) (unless exempted under 41 C.F.R. § 60-1.5).

C. Establishment of Responsibility for Implementation of the Plan 41 C.F.R. § 60-2.17(a)

a. Identification and Responsibilities of EEO Administrator

Overall responsibility for MSU Bozeman's plan rests with the EEO Administrator. The EEO Administrator ensures that the plan complies with all applicable laws, orders and regulations, including but not limited to, Executive Orders 11246, 13496, and their progeny. Specifically, the designated representative's duties include:

1. Developing, maintaining and, where appropriate, modifying MSU Bozeman's plan to ensure compliance with the EEO/AA law.
2. Developing, and where appropriate, modifying procedures for effectively communicating the plan and its elements both internally and externally.
3. Advising on EEO/AA progress, reporting potential EEO/AA problem areas, and assisting management in finding equitable solutions, where feasible, to any identifiable EEO/AA problem areas.
4. Evaluating the effectiveness of MSU Bozeman's plan on a regular basis, and reporting to management.



5. Overseeing audit and reporting systems that periodically measure the effectiveness of the total affirmative action program. 41 C.F.R. § 2.17 (d)(1)-(4), identifying the need for remedial action, and determining the degree to which objectives have been achieved.
6. Acting as MSU Bozeman's representative and liaison with any government agencies regarding this plan.
7. Monitoring MSU Bozeman's policies and procedures with regard to terms and conditions of employment to ensure compliance with affirmative action obligations.
8. Auditing the content of electronic policies, as appropriate, to ensure compliance information is posted and up to date.
9. Keeping management up to date on the latest developments in the areas of EEO and affirmative action.
10. Serving as a liaison between MSU Bozeman and organizations, such as minority organizations and women's organizations.
11. Communicating EEO/AA policies with all personnel, including management, to ensure that MSU Bozeman's policies and the need for their support are understood at all levels.
12. Auditing training programs, hiring, and promotion patterns.

b. Responsibilities of MSU Bozeman's Leadership

MSU Bozeman's Leadership, which shall include all levels of management, including, but not limited to: Provost, Vice Presidents, Associate Vice Presidents, Deans, Department Heads and Chairs, Directors and Managers share responsibility for the plan, including but not limited to the following:

1. Assisting in auditing plan progress, including identifying problem areas, formulating solutions, establishing appropriate goals, and developing necessary training programs.
2. Preparing oversight of personnel procedures and decision within area of responsibility to ensure qualified individuals are treated in a nondiscriminatory manner in hiring, promotion, transfers, and termination actions.
3. Reviewing the job performance of each employee to assess whether personnel actions are justified based on the employee and his or her duties.
4. Reviewing position descriptions of the jobs in the manager's area or department to see that they adequately reflect the job to be performed.
5. Assisting subordinates and upper management in the prevention of harassment.



III. Identification of Areas of Discussion 41 C.F.R. § 60-2.17(b)

MSU Bozeman will conduct periodic reviews of mission critical workforce factors in a number of ways, including performing an in-depth analysis of its total employment process to determine whether and where impediments to equal employment opportunity exist. These analyses include:

1. The workforce by organizational unit and job group of minority or female utilization and distribution;
2. Personnel activity to determine whether there are selection disparities;
3. Compensation systems to determine if there are sex-, race-, or ethnicity-based disparities;
4. Selection, recruitment, referral, and other personnel procedures to determine whether they result in employment or placement disparities of minorities or women; and,
5. Any other areas that might impact the success of the affirmative action program. 41 C.F.R. § 2.17 (b)(1)-(5), including, for example, MSU Bozeman’s review of:
 - a. The workforce composition by race and sex to compare it to the availability of these groups;
 - b. MSU Bozeman's applicant flow compared to the availability for the protected groups;
 - c. A comparison of hires to applicants pertaining to minorities and women;
 - d. Compensation system(s) to determine whether there are sex-, race-, or ethnicity-based disparities;
 - e. Selection forms, such as applications for employment, to ensure they comply with federal and state employment laws;
 - f. Processes to ensure there are no artificially created barriers or restrictive seniority provisions; and,
 - g. Training opportunities to ensure they are available to minorities and women. Identification of problem areas are discussed in the next section titled Narrative Discussion of goals.

IV. Narrative Discussion of Goals

The Montana State University Bozeman plan has 3503 employees, including 299 minorities and 1944 females. The following goals exist for minorities and/or women:

- 100 - Executive / Administrative / Managerial - This group consists of 57 employees, of whom 4 are minorities and 22 are females. There is a goal of 21% for minorities and a goal of 57% for females.
- 200 - Instructors - This group consists of 607 employees, of whom 34 are minorities and 369 are females. There is a goal of 15% for minorities, but there is no need to set a placement goal at this time for females.
- 220 - Professors - This group consists of 182 employees, of whom 10 are minorities and 56 are females. There is a goal of 10% for minorities and a goal of 59% for females.
- 230 - Associate Professors - This group consists of 161 employees, of whom 17 are minorities and 80 are females. There is no need to set a placement goal at this time for minorities, but there is a goal of 59% for females.
- 240 - Assistant Professors - This group consists of 154 employees, of whom 18 are minorities and 83 are females. There is a goal of 17% for minorities, but there is no need to set a placement goal at this time for females.
- 250 - All Other Faculty - This group consists of 200 employees, of whom 19 are minorities and 134 are females. There is a goal of 19% for minorities and a goal of 76% for females.
- 300 - Directors - This group consists of 120 employees, of whom 6 are minorities and 55 are females. There is a goal of 22% for minorities, but there is no need to set a placement goal at this time for females.
- 310 - Program Managers - This group consists of 183 employees, of whom 14 are minorities and 119 are females. There is no need to set a placement goal at this time for minorities or females.
- 320 - IT / Engineering Professionals - This group consists of 144 employees, of whom 15 are minorities and 34 are females. There is no need to set a placement goal at this time for minorities or females.
- 330 - Research Associates / Scientists - This group consists of 269 employees, of whom 25 are minorities and 122 are females. There is a goal of 15% for minorities, but there is no need to set a placement goal at this time for females.
- 340 - Administrative Professionals - This group consists of 257 employees, of whom 21 are minorities and 210 are females. There is a goal of 12% for minorities, but there is no need to set a placement goal at this time for females.

- 350 - Coaches - This group consists of 40 employees, of whom 4 are minorities and 10 are females. There is a goal of 16% for minorities and a goal of 47% for females.
- 360 - All Other Professionals - This group consists of 521 employees, of whom 43 are minorities and 338 are females. There is a goal of 14% for minorities, but there is no need to set a placement goal at this time for females.
- 400 - Clerical and Secretarial - This group consists of 90 employees, of whom 8 are minorities and 86 are females. There is no need to set a placement goal at this time for minorities or females.
- 500 - Technical and Paraprofessional - This group consists of 157 employees, of whom 16 are minorities and 119 are females. There is no need to set a placement goal at this time for minorities or females.
- 600 - Skilled Crafts - This group consists of 54 employees, of whom 4 are a minority and 0 are a female. There is a goal of 2% for females, but there is no need to set a placement goal at this time for minorities.
- 700 - Service / Maintenance - This group consists of 307 employees, of whom 40 are minorities and 107 are females. There is a goal of 19% for minorities, but there is no need to set a placement goal at this time for females.

MSU Bozeman will use alternate recruitment sources when necessary to attract more qualified external applicants. In those instances where statistical adverse impact is indicated, MSU Bozeman will take action as outlined in the Action-Oriented Programs Section to monitor and eliminate any problem areas, as well as other similar actions.

Individuals appointed as visiting faculty, post-doctoral research associates, or other non-tenure track positions labeled EEO-6 category 3, are included as part of the workforce summaries, but placement goals are not established for this group. By definition, the positions are of a limited duration.

Placement goals are not set for job groups in the graduate student/student assistant category because student appointments are related solely to academic programs and are not part of the normal hiring procedures.

V. Development & Execution of Action-Oriented Programs 41 C.F.R. § 60-2.17(c)

MSU Bozeman has programs designed to eliminate any problem areas, should they exist, in accordance with §60-2.17(b), and to help achieve specific affirmative action goals. MSU Bozeman also makes a good-faith effort to remove identified barriers, expand employment opportunities, and produce measurable results. These programs may include the following items:

1. Conducting periodic reviews of job descriptions attempting to ensure they accurately reflect job-related duties and responsibilities.
2. Reviewing job qualifications by department and job title for job-relatedness and using job performance criteria as positions are recruited for, or other personnel activities take place.
3. Making job vacancy announcements including qualifications available to recruiting sources and to all members of management involved in the recruiting, screening, selection, and promotion processes.
4. Making good-faith efforts to select the most qualified candidates. MSU Bozeman will make good faith efforts to remedy any statistically significant underutilization of minorities and women it identifies. Accordingly, MSU Bozeman commits to evaluating the total selection process to ensure that decisions are made in a nondiscriminatory manner through:
 - a. Reviewing the job applications and other pre-employment forms to ensure information requested is job-related;
 - b. Evaluating selection methods that may have a disparate impact to ensure that they are job-related and consistent with business necessity;
 - c. Providing assistance, such as training and guidance on proper interviewing techniques and EEO training, to employees, management, and supervisory staff, including, but not limited to, those who are involved in the recruitment, selection, discipline, and other related processes, so that personnel actions remain neutral; and
 - d. Reviewing selection techniques and employment standards.
5. Employing appropriate methods to attempt to improve recruitment and increase the flow of qualified minorities and women applicants in its recruiting process, including a number of the following actions:
 - a. Including the phrase at a minimum, "Equal Opportunity Employer, Veterans/Disabled Employer" in printed employment advertisements;
 - b. Placing help-wanted advertisements, when appropriate, in minority news media and women's interest media;
 - c. Disseminating information on job opportunities to organizations representing minorities, women, and employment development agencies when job opportunities occur;



- d. Requesting employment agencies to refer qualified minorities and women.
 - e. Considering special employment programs designed to deal with underutilization. Business conditions and other feasibility matters remain the key factor in any decision to develop/implement such programs.
 - f. Participating in job fairs, career days, youth-motivation programs and other programs that foster exposure for qualified minorities and women whenever feasible and appropriate.
 - g. Encouraging minorities and women to participate in University sponsored activities and programs.
6. MSU Bozeman reviews promotion criteria and procedures so that job qualifications form the basis for the promotional decisions without regard to race, color, national origin (ancestry), sex, sexual preference/orientation, gender identity, gender expression, transgender, marital or parental status, age, creed, religion or political beliefs, mental or physical disability, genetic information or status as a veteran. MSU Bozeman will monitor promotion rates for minorities and women and, when necessary, may employ one or more of the following procedures:
- a. Maintaining an inventory of current minority and women employees.
 - b. Providing job training, job-related courses or certificate programs.
 - c. Reviewing work specifications and job qualifications to ensure job- relatedness.
 - d. Reviewing promotion decisions for possible impact on women or minorities.
 - e. Informing employees about educational programs and other opportunities available to improve their employment prospects.
 - f. Reviewing seniority practices for possible impact on women and minorities.
 - g. Reviewing MSU Bozeman-sponsored social and recreational activities to ensure non-discriminatory participation and availability.
 - h. Ensuring that all employees are given equal opportunity for promotion. This is achieved by:
 - 1. Generally posting or otherwise announcing most promotional opportunities.
 - 2. Assisting employees in identifying promotional opportunities, training, and educational programs to encourage and enhance professional growth.
 - 3. Evaluating job requirements for promotion.

VI. Internal Audit and Reporting System 41 C.F.R. § 60-2.17(d)

1. MSU Bozeman's EEO Administrator maintains an internal audit system to oversee MSU Bozeman's Affirmative Action Plan and assess progress. The EEO Administrator is responsible for ensuring that the formal AAP documents are developed and prepared and for the effective AAP implementation; however, responsibility is likewise vested with each department manager and supervisor, depending upon the specific responsibility. The audit system is designed and implemented to measure the effectiveness of the total affirmative action program [41 C.F.R. § 2.17 (d)(1)-(4)], including:
 - a. Monitoring records of all personnel activity, including promotions, terminations, and compensation, at all levels, to ensure the nondiscriminatory policy is carried out,
 - b. Requesting internal reporting on a scheduled basis as to the degree to which equal employment opportunity and organizational objectives are attained,
 - c. Reviewing reports at all levels of management; and
 - d. Advising top management of the program's effectiveness and submitting recommendations to improve unsatisfactory performance. 41 C.F.R. § 2.17 (d)(1)- (4).
2. MSU Bozeman reviews various employment decisions, such as hiring decisions, promotions, and terminations. MSU Bozeman maintains summary data where necessary and feasible and conducts regular reviews at least annually.
3. There is no "de facto" (in practice without being officially established) segregation. Further, MSU Bozeman ensures that facilities, as broadly defined in 41 C.F.R. § 60- 1.8, provided for employees are provided in such a manner that segregation on the basis of race, color, national origin (ancestry), sex, sexual preference/orientation, gender identity, gender expression, transgender, marital or parental status, age, creed, religion or political beliefs, mental or physical disability, genetic information or status as a veteran cannot result, provided that separate or single-user restrooms and necessary dressing or sleeping areas shall be provided to ensure privacy between the sexes.
4. MSU Bozeman complies with required records retention provisions set forth in 41 C.F.R. §60- 1.12 and elsewhere in the applicable OFCCP regulations, and maintains a) employment applications; b) summary data of applicant flow by identifying, at least, total applicants, total minority applicants, and total female applicants, where necessary and feasible, and conducts regular reviews at least annually; c) applicant flow showing the name, race, sex, date of application, job title, interview status, and the action taken for all individuals applying for job opportunities, and the relevant applicant/hire decisions; d) summary data of external job offers and hires, promotions, resignations, terminations, and layoffs by job group and by sex and minority group identification; e) and records pertaining to its compensation system.



5. Provide needed reports to managers and supervisors regarding the results of the audit as well as MSU Bozeman's overall progress in the area of EEO/AA. Any recommended actions should be taken as well. Reports shall be made to senior management on at least a biennial basis.

VII. Policy with Respect to Religion/National Origin 41 C.F.R. § 60-50.1 et seq.

Pursuant to the guidelines prohibiting discrimination on the basis of religion or national origin, 41 C.F.R. § 60-50.1, et seq., MSU Bozeman hereby reaffirms that it does not discriminate against employees, or applicants for employment, because of religion or national origin. MSU Bozeman takes affirmative action to seek to ensure that employees or applicants for employment are treated without regard to their religion or national origin in all aspects of the terms and conditions of employment, such as upgrading, demotion, transfer, recruitment, recruitment advertising, layoff, termination, rates of pay (or other forms of compensation), and selection for training.

MSU Bozeman has reviewed its employment practices and determined that its employees, including those who belong to religious or ethnic groups, have received fair consideration for job opportunities. Based upon its review, and depending upon the circumstances, MSU Bozeman will undertake appropriate actions, which may include one or more of the following activities:

1. Issuing a policy directive to employees reaffirming the MSU Bozeman's obligation to provide equal employment opportunity without regard to religion or national origin. This policy will be communicated in such a manner as to foster understanding, acceptance, and support among executives, managers, supervisors, and other employees, and to encourage such persons to take the necessary action to aid MSU Bozeman in meeting its obligations.
2. Developing internal procedures to seek to ensure that MSU Bozeman's obligation to provide equal employment opportunity, without regard to religion or national origin, is being fully implemented. Specifically, employment activities are reviewed by the EEO Administrator.
3. Informing management annually of its commitment to equal employment opportunity, without regard to religion or national origin.
4. Enlisting the assistance and support of recruitment sources for this commitment.

MSU Bozeman acknowledges its responsibility to make reasonable accommodations for the religious observances and practices of its existing or prospective employees under the terms of Title VII of the Civil Rights Act of 1964. An accommodation for religious purposes will be denied should MSU Bozeman determine that it would have to suffer undue hardship. During this accommodation evaluation, the following factors will continue to be considered by MSU Bozeman:



1. Business necessity;
2. Financial costs and expenses; and
3. Resulting personnel problems.

VIII. Organizational Profile

Contractors and subcontractors are required to include in their AAPs an organizational profile of their workforce using either a “workforce analysis” or “organizational display” that provides details reflecting staffing patterns within the establishment. 41 C.F.R. § 60-2.11. An organizational profile shows the staffing pattern within a contractor’s establishment. This profile assists an employer in identifying where, in the workforce of its site which is the subject of this AAP, women or minorities are underrepresented or concentrated. A workforce analysis is used in this AAP, which lists each job title from the lowest paid to the highest paid within each department or similar organizational unit.

Organization Profile Summary										
Unit	Total	Male Female	White	Black	Hispanic	Asian	Native Hawaiian	Native American	Two or More	Minority
Academic Technology & Outreach	27	10	10	0	0	0	0	0	0	0
		17	16	0	0	0	0	0	0	1
Admin & Finance	179	50	46	1	2	0	0	0	0	1
		129	120	0	4	2	0	1	2	13
Admin & Finance - Auxiliaries	332	180	155	2	8	4	0	4	7	40
		152	137	0	5	8	0	0	2	2
Admin & Finance - Facilities	207	159	146	1	4	1	0	1	6	17
		48	44	0	0	3	0	0	1	1
Athletics	100	63	55	6	1	0	0	0	1	13
		37	32	1	2	0	0	0	2	2
College of Agriculture	575	285	256	1	7	11	0	2	8	58
		290	261	1	9	11	0	4	4	4
College of Arts & Architecture	171	79	72	0	3	2	0	0	2	14
		92	85	0	1	4	0	1	1	1
College of Educ Hlth & Human Dev	220	53	46	1	1	0	0	4	1	25
		167	149	1	4	3	0	3	7	7
College of Engineering	356	260	249	0	1	6	0	2	2	14
		96	93	0	1	2	0	0	0	0
College of Letters & Science	750	409	374	3	11	4	1	5	11	68
		341	308	0	6	12	1	8	6	6
College of Nursing	205	17	16	0	0	0	0	1	0	13
		188	176	0	2	0	0	6	4	4
Extension Service	155	42	42	0	0	0	0	0	0	9
		113	104	0	1	0	1	4	3	3
Gallatin College	109	48	46	0	1	0	0	0	1	8
		61	55	1	1	1	0	0	3	3
Jabs College of Business	93	47	44	0	0	1	0	0	2	7
		46	42	1	1	1	0	0	1	1
Library Services	53	14	14	0	0	0	0	0	0	4
		39	35	0	1	0	0	0	3	3
Museum of the Rockies	47	25	22	1	1	0	0	0	1	5
		22	20	0	1	0	0	0	1	1
President	176	98	91	1	2	0	0	0	4	15
		78	70	0	3	3	0	1	1	1
Provost	172	55	52	0	1	0	0	0	2	13
		117	107	2	2	2	0	1	3	3
Research	293	132	121	1	2	1	0	1	6	36
		161	136	0	6	9	0	8	2	2
Student Success	210	55	51	0	1	0	0	2	1	19
		155	140	0	5	3	0	1	6	6

IX. Placement Goals

Contractors and subcontractors must compare the percentage of minorities and women in each job group with the availability for those job groups as calculated in this AAP. 41 C.F.R. § 60-2.13 to 60.2.15. When the percentage of minorities or women in a job group is less than would be reasonably expected given their availability, contractors are required to establish placement goals, which also serve as reasonably attainable objectives to measure progress toward achieving equal employment opportunity. 41 C.F.R. § 60-2.16.

Contractors may use a number of methods to determine whether their actual employment percentage of minorities and/or females is lower than would reasonably be expected, including the need to set a placement goal when:

- 1) there is “any difference” between the availability percentage and the employment percentage;
- 2) actual employment is less than 80 percent of calculated availability (which is the expected representation); or,
- 3) the difference between the actual and expected employment is statistically significant. Any reasonable method, as long as it is uniformly applied, is acceptable to the OFCCP.

Placement goals are established as a percentage equal to the calculated availability and serve as objectives or targets reasonably attainable by means of applying every good faith effort to make all aspects of the entire affirmative action program work. 41 C.F.R. § 60-

2.16. Although a contractor is required to make good faith efforts to meet its goals, the goals are not allowed under law to be quotas (except a few circumstances, such as when there is a court order to remedy prior unlawful discrimination.)

Placement Goals										
Job Group	Group Size	Employment (%) Female	Employment (%) Minority	Availability (%) Female	Availability (%) Minority	Placement Goals Needed Female	Placement Goals Needed Minority	Annual Goal (%) Female	Annual Goal (%) Minority	
100 - Executive / Administrative / Managerial	57	39	7	57	21	Yes (1)	Yes (2)	57	21	
200 - Instructors	607	61	6	46	15	No (1)	Yes (1)		15	
220 - Professors	182	31	5	59	10	Yes (1)	Yes (1)	59	10	
230 - Associate Professors	161	50	11	55	12	No (1)	No (1)			
240 - Assistant Professors	154	54	12	47	17	No (1)	Yes (1)		17	
250 - All Other Faculty	200	67	10	76	19	Yes (1)	Yes (1)	76	19	
300 - Directors	120	46	5	43	22	No (1)	Yes (1)		22	
310 - Program Managers	183	65	8	49	11	No (1)	No (1)			
320 - IT / Engineering Professionals	144	24	10	27	14	No (1)	No (1)			
330 - Research Associates / Scientists	269	45	9	43	15	No (1)	Yes (1)		15	
340 - Administrative Professionals	257	82	8	71	12	No (1)	Yes (1)		12	
350 - Coaches	40	25	10	47	16	Yes (1)	Yes (2)	47	16	
360 - All Other Professionals	521	65	8	63	14	No (1)	Yes (1)		14	
400 - Clerical and Secretarial	90	96	9	93	8	No (2)	No (1)			
500 - Technical and Paraprofessional	157	76	10	56	14	No (1)	No (1)			
600 - Skilled Crafts	54	0	7	2	5	Yes (2) *	No (2)	2		
700 - Service / Maintenance	307	35	13	40	19	No (1)	Yes (1)		19	

*****Placement goals*****



X. Progress Toward Goals Report

Contractors and subcontractors must maintain its current affirmative action plan (AAP) and documentation of good faith efforts and must preserve its AAP and documentation of good faith efforts for the immediately preceding AAP year. 41 C.F.R. § 60-1.12 (b).

One of the key components to the effective implementation of an AAP is the acknowledgement of progress toward the goals established in the utilization analysis of the preceding year. As such, this is one of the items requested by OFCCP during a routine compliance evaluation.

To compare progress toward goals, the contractor must measure the employment activity that has occurred during the plan year. The variable here is opportunities which are defined by OFCCP as total placements (hires plus promotions) into the job group.

Progress Towards Goals							
Job Group	Total HC	Female HC	Minority HC	Prior Goal - Female HC	Prior Goal - Minority HC	Goal Met - Female	Goal Met - Minority
100 - Executive / Administrative / Managerial	57	22	4	31	10	N	N
200 - Instructors	607	369	34		85		N
220 - Professors	182	56	10	100	16	N	N
230 - Associate Professors	161	80	17	89		N	
240 - Assistant Professors	154	83	18		26		N
250 - All Other Faculty	200	134	19	142	48	N	N
300 - Directors	120	55	6		22		N
310 - Program Managers	183	119	14				
320 - IT / Engineering Professionals	144	34	15		17		N
330 - Research Associates / Scientists	269	122	25		43		N
340 - Administrative Professionals	257	210	21		28		N
350 - Coaches	40	10	4				
360 - All Other Professionals	521	338	43		73		N
400 - Clerical and Secretarial	90	86	8				
500 - Technical and Paraprofessional	157	119	16				
600 - Skilled Crafts	54	0	4		3		Y
700 - Service / Maintenance	307	107	40		58		N

XI. Disparity Analysis

Contractors and subcontractors are required to include personnel activity (applicant flow, hires, terminations, promotions, and any other personnel actions) to determine whether there are selection disparities. 41 C.F.R. § 60-2.17 (b) (2).

The Disparity Analysis is a tool to measure the statistical relationship between two selected groups. The following report identifies whether the rates of those hired, promoted, or terminated are similar without regard to race or gender.

Disparity Analysis-Hires

200 - Instructors											
Favored vs Non-Favored	Total Hires	Total Apps	Total Unknowns	Favored Hires	Favored Apps	Non-Favored Hires	Non-Favored Apps	Favored Selection Rate(%)	Non-Favored Selection Rate(%)	Standard Deviation	Disparity
Female vs Male	127	1980	145	80	960	47	875	8.33	5.37	2.50	Yes
White vs Minority	127	1980	135	120	1393	7	452	8.61	1.55	5.16	Yes

240 - Assistant Professors											
Favored vs Non-Favored	Total Hires	Total Apps	Total Unknowns	Favored Hires	Favored Apps	Non-Favored Hires	Non-Favored Apps	Favored Selection Rate(%)	Non-Favored Selection Rate(%)	Standard Deviation	Disparity
Female vs Male	8	202	33	6	59	2	110	10.17	1.82	2.44	Yes
White vs Minority	8	202	23	5	70	3	109	7.14	2.75	1.39	No

250 - All Other Faculty											
Favored vs Non-Favored	Total Hires	Total Apps	Total Unknowns	Favored Hires	Favored Apps	Non-Favored Hires	Non-Favored Apps	Favored Selection Rate(%)	Non-Favored Selection Rate(%)	Standard Deviation	Disparity
Female vs Male	25	109	6	19	76	6	27	25	22.22	0.29	No
White vs Minority	25	109	7	21	77	3	25	27.27	12	1.56	No

300 - Directors											
Favored vs Non-Favored	Total Hires	Total Apps	Total Unknowns	Favored Hires	Favored Apps	Non-Favored Hires	Non-Favored Apps	Favored Selection Rate(%)	Non-Favored Selection Rate(%)	Standard Deviation	Disparity
Female vs Male	21	184	11	10	76	10	97	13.16	10.31	0.58	No
White vs Minority	21	184	6	18	149	3	29	12.08	10.34	0.27	No

310 - Program Managers											
Favored vs Non-Favored	Total Hires	Total Apps	Total Unknowns	Favored Hires	Favored Apps	Non-Favored Hires	Non-Favored Apps	Favored Selection Rate(%)	Non-Favored Selection Rate(%)	Standard Deviation	Disparity
Female vs Male	62	467	27	39	250	22	190	15.6	11.6	1.21	No
White vs Minority	62	467	22	58	377	3	32	15.38	9.38	0.92	No

320 - IT / Engineering Professionals											
Favored vs Non-Favored	Total Hires	Total Apps	Total Unknowns	Favored Hires	Favored Apps	Non-Favored Hires	Non-Favored Apps	Favored Selection Rate(%)	Non-Favored Selection Rate(%)	Standard Deviation	Disparity
Female vs Male	32	288	27	10	42	19	219	23.81	8.68	2.86	Yes
White vs Minority	32	288	23	24	156	6	83	15.38	7.23	1.81	No

330 - Research Associates / Scientist											
Favored vs Non-Favored	Total Hires	Total Apps	Total Unknowns	Favored Hires	Favored Apps	Non-Favored Hires	Non-Favored Apps	Favored Selection Rate(%)	Non-Favored Selection Rate(%)	Standard Deviation	Disparity
Female vs Male	33	342	14	13	123	18	205	10.57	8.78	0.54	No
White vs Minority	33	342	22	17	131	7	189	12.98	3.7	3.10	Yes

340 - Administrative Professionals											
Favored vs Non-Favored	Total Hires	Total Apps	Total Unknowns	Favored Hires	Favored Apps	Non-Favored Hires	Non-Favored Apps	Favored Selection Rate(%)	Non-Favored Selection Rate(%)	Standard Deviation	Disparity
Female vs Male	107	592	23	90	379	17	190	23.75	8.95	4.26	Yes
White vs Minority	107	592	17	96	471	10	65	20.38	15.38	0.95	No



350 - Coaches											
Favored vs Non-Favored	Total Hires	Total Apps	Total Unknowns	Favored Hires	Favored Apps	Non-Favored Hires	Non-Favored Apps	Favored Selection Rate(%)	Non-Favored Selection Rate(%)	Standard Deviation	Disparity
Male vs Female	3	15	1	2	9	1	5	22.22	20	0.10	No
White vs Minority	3	15	0	3	12	0	3	25	0	0.97	No

360 - All Other Professionals											
Favored vs Non-Favored	Total Hires	Total Apps	Total Unknowns	Favored Hires	Favored Apps	Non-Favored Hires	Non-Favored Apps	Favored Selection Rate(%)	Non-Favored Selection Rate(%)	Standard Deviation	Disparity
Female vs Male	86	992	71	92	526	43	391	17.49	11.00	2.74	Yes
White vs Minority	86	992	47	118	766	14	170	15.4	8.24	2.43	Yes

400 - Clerical and Secretarial											
Favored vs Non-Favored	Total Hires	Total Apps	Total Unknowns	Favored Hires	Favored Apps	Non-Favored Hires	Non-Favored Apps	Favored Selection Rate(%)	Non-Favored Selection Rate(%)	Standard Deviation	Disparity
Female vs Male	30	128	6	26	93	3	29	27.96	10.34	1.95	No
White vs Minority	30	128	7	26	105	2	16	24.76	12.5	1.08	No

500 - Technical and Paraprofessional											
Favored vs Non-Favored	Total Hires	Total Apps	Total Unknowns	Favored Hires	Favored Apps	Non-Favored Hires	Non-Favored Apps	Favored Selection Rate(%)	Non-Favored Selection Rate(%)	Standard Deviation	Disparity
Female vs Male	51	243	23	33	128	15	92	25.78	16.30	1.68	No
White vs Minority	51	243	7	42	194	8	32	21.65	25	-0.42	No

600 - Skilled Crafts											
Favored vs Non-Favored	Total Hires	Total Apps	Total Unknowns	Favored Hires	Favored Apps	Non-Favored Hires	Non-Favored Apps	Favored Selection Rate(%)	Non-Favored Selection Rate(%)	Standard Deviation	Disparity
Male vs Female	13	72	4	13	67	0	1	19.40	0.00	0.49	No
White vs Minority	13	72	5	9	50	3	17	18	17.65	0.03	No

700 - Service / Maintenance											
Favored vs Non-Favored	Total Hires	Total Apps	Total Unknowns	Favored Hires	Favored Apps	Non-Favored Hires	Non-Favored Apps	Favored Selection Rate(%)	Non-Favored Selection Rate(%)	Standard Deviation	Disparity
Female vs Male	184	536	52	62	178	105	306	34.83	34.31	0.12	No
White vs Minority	184	536	29	137	378	35	128	36.24	27.34	2.19	Yes

