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Executive Summary

Departmental History

Since its inception in 1972, the Equal Opportunity and Diversity (EOD) office, formerly called the Office of Affirmative Action, has developed, implemented, and monitored the affirmative action and equal employment opportunity compliance program at the University of Iowa as established by federal legislation and regulations. The office has been charged with the specific responsibility of compliance monitoring as its primary function; however, the university has always viewed compliance as the legal requirement and minimum standard. That concept has been repeatedly reaffirmed in each of the university’s strategic plans. Beyond compliance, the university’s internal policies are designed to establish human rights and to realize a diverse community intellectually and culturally—goals that the university regards as most appropriate for an academic institution.

Mission

EOD supports a campus environment where each individual's ideas, contributions, and goals are respected and valued. EOD is charged with implementation of equal opportunity, affirmative action, and diversity policies at the University of Iowa. We serve as a resource to support the university's compliance with federal/state laws and regulations and university policies prohibiting discrimination, harassment, retaliation, and sexual harassment by or towards any UI community member.

Constituents Served

EOD serves all areas of the University of Iowa community, including UI Health Care units, through its programs to:

- Monitor the recruitment process for faculty and P&S staff
- Investigate complaints of harassment and/or discrimination
- Respond to complaints filed with state or federal civil rights enforcement agencies
- Provide educational programs to UI faculty and staff on harassment prevention and response
- Collaborate on policy reviews for the UI campus community

Strengths and Challenges

Strengths of EOD include the work of the Complaint Investigations Unit (CIU) staff, particularly their coordinated campus response to reports of harassment or discrimination; the Equal Employment Opportunity (EEO) / Affirmative Action (AA) Unit’s collaborations with University Human Resources (UHR) and the Provost’s Office to ensure a fair and equitable recruitment process for university faculty and staff; and the excellent relations that all EOD staff enjoy with their campus partners.

Challenges for EOD include increasing the staffing level for the CIU to ensure a more prompt response to reported concerns; technology and tech support challenges for EOD’s online harassment prevention education programs; and identifying mechanisms to extract data from the new talent acquisition system (OTAC) in order to prepare required compliance reports.
I. Departmental Introduction

Departmental History

Since its inception in 1972, the Office of Equal Opportunity and Diversity (EOD), formerly called the Office of Affirmative Action, has developed, implemented, and monitored the affirmative action and equal employment opportunity compliance program at the University of Iowa as established by federal legislation and regulations. The office has been charged with the specific responsibility of compliance monitoring as its primary function; however, the university has always viewed compliance as the legal requirement and minimum standard. That concept has been repeatedly reaffirmed in each of the university’s strategic plans. Beyond compliance, the university’s internal policies are designed to establish human rights and to realize a diverse community intellectually and culturally—goals that the university regards as most appropriate for an academic institution.

EOD regards education as central to its mission, along with its responsibility for compliance monitoring, and regards the two functions as inextricably linked. Education is accomplished through providing educational programs and resource materials, collecting and reporting data on employment practices, handling and resolving complaints of discrimination and harassment, and through participation in the development of university-wide policies affecting faculty, staff, and students.

The size of the office staff has grown over the years, reflecting the growth of the academic, health care, and research enterprises at the University of Iowa. The office currently is part of the Division of Diversity, Equity, and Inclusion (DDEI), formerly called the Chief Diversity Office (CDO). EOD is led by Jennifer Modestou, who reports to Dr. Melissa Shivers, the Interim Associate Vice President for Diversity, Equity, and Inclusion.

Organizational Framework (Organizational Chart)

See the attached organizational chart for EOD, Item A on page 26 of the Appendix.

Departmental Strategic Plan

As a unit of the Division of Diversity, Equity, and Inclusion, EOD has been participating in the meetings to finalize the new Diversity, Equity, and Inclusion Action Plan. Proposed primary goals of this action plan include:

◆ Create and sustain an inclusive and equitable campus environment
◆ Recruit, retain and advance a diverse campus community of faculty, staff, and students
◆ Integrate diversity, equity and inclusion into the university’s core academic mission of teaching, curriculum development, research and discovery, engagement, and clinical services
◆ Enhance campus-wide DEI accountability, effectiveness, and collaboration

EOD, along with many other DEI partners across campus, will have designated strategies and tasks to accomplish within the framework of this new action plan. The DDEI action plan is
designed to align with the strategies and critical tasks articulated in the university’s Strategic Plan 2016-2021.

Additionally, EOD staff members develop short- and long-term programmatic goals as part of their annual performance review, which are reviewed and approved in advance by their supervisors and department head.

Constituents Served

EOD serves all areas of the University of Iowa community, including UI Health Care units, through its programs to:

- Monitor the recruitment process for faculty and P&S staff
- Investigate complaints of harassment and/or discrimination
- Respond to complaints filed with state or federal civil rights enforcement agencies
- Provide educational programs to UI faculty and staff on harassment prevention and response
- Collaborate on policy reviews for the UI campus community

Key Data Points

Internal and External Complaints Filed with EOD

The Office of Equal Opportunity and Diversity serves as an entry point for the resolution and/or investigation of complaints of discrimination and harassment based upon race, creed, color, religion, national origin, age, sex, pregnancy, disability, genetic information, status as a U.S. veteran, service in the U.S. military, sexual orientation, gender identity, associational preference, or any other classification that deprives the person of consideration as an individual, pursuant to the following university policies:¹

- Policy on Human Rights
- Policy on Sexual Harassment
- Policy on Consensual Relationships Involving Students
- Policy on Violence
- Anti-Harassment Policy
- Anti-Retaliation Policy

Students, staff, and faculty are notified annually by email of these policies, as well as the Policy on Sexual Misconduct, Dating/Domestic Violence, or Stalking Involving Students.

EOD’s Complaint Investigations Unit (CIU) staff are trained attorneys who, serving as neutral investigators, investigate complaints brought by university community members and/or departmental or collegiate administrators. Our objective is to investigate complaints of discrimination and harassment in a fair and appropriate manner. Persons who feel they may have been discriminated against may seek assistance in resolving claims of disparate treatment either informally or formally.

Discrimination may be systemic, where unequal treatment results from seemingly neutral institutional practices that continue the effects of past discrimination, or individual, when a

¹ The full text of these university policies is available at http://diversity.uiowa.edu/eod/policies
person is subject to unequal treatment on the basis of one of the legally protected categories referenced above. In either case, the discriminatory act generally has the effect of denying a person fair consideration as an individual.

Any student, staff member, or faculty member may file a complaint with the Office of Equal Opportunity and Diversity alleging violation of any of these policies by any other member of the university community. Where appropriate, such complaints may be filed against units, departments, or other organizational components of the university.

Informal complaints are resolved by negotiation, conciliation, and, in some cases, unilateral remedies affecting the complainant only. The accused is notified of the charges only upon the consent of the complainant. No action may be taken against the accused unless they are notified of the charges and given an opportunity to respond. The formal resolution of complaints consists of notification of the accused and an opportunity to respond, full investigation of the charges, and written findings of fact and recommendations.

In Fiscal Year 2018, (July 1, 2017 – June 30, 2018), EOD responded to a record number of internal and external complaints filed with the office or against the university. A total of 90 complaints were filed with the Office of Equal Opportunity and Diversity, or with external agencies, by 66 complainants alleging violation of University of Iowa policies. This total represents a 50 percent increase over the number of complaints filed during the previous fiscal year and a 23 percent increase over the number of complaints filed in Fiscal Year 2014.

The table below show the number of internal and external complaints filed over the past five fiscal years. Internal complaints include both formal and informal complaints.

<table>
<thead>
<tr>
<th>Category</th>
<th>FY '14</th>
<th>FY '15</th>
<th>FY '16</th>
<th>FY '17</th>
<th>FY '18</th>
<th>Total, FYs '14 – '18</th>
</tr>
</thead>
<tbody>
<tr>
<td>Internal Complaints (filed with EOD)</td>
<td>45</td>
<td>31</td>
<td>32</td>
<td>43</td>
<td>50</td>
<td>201</td>
</tr>
<tr>
<td></td>
<td>62 %</td>
<td>58 %</td>
<td>58 %</td>
<td>72 %</td>
<td>56 %</td>
<td>61 %</td>
</tr>
<tr>
<td>External Complaints (filed with outside agencies)</td>
<td>28</td>
<td>22</td>
<td>23</td>
<td>17</td>
<td>40</td>
<td>130</td>
</tr>
<tr>
<td></td>
<td>38 %</td>
<td>42 %</td>
<td>42 %</td>
<td>28 %</td>
<td>44 %</td>
<td>39 %</td>
</tr>
<tr>
<td>Total</td>
<td>73</td>
<td>53</td>
<td>55</td>
<td>60</td>
<td>90</td>
<td>331</td>
</tr>
</tbody>
</table>

The 90 complaints in FY 2018 were based on 162 allegations of discrimination, harassment, or other policy violations. The most prevalent allegations were of race discrimination (23 complaints), sexual harassment/sexual assault (23 complaints), retaliation (22 complaints), age discrimination (21 complaints), and sex discrimination (20 complaints).

Annual Equal Employment Opportunity / Affirmative Action (Diversity) Report to the Board of Regents, State of Iowa

EOD staff prepare this annual report that highlights employment activity at the University of Iowa. The report is prepared from workforce data compiled according to Board of Regents guidelines, i.e., it includes all regular full-time and part-time employees working 50 percent time or more on the annual snapshot date. Changes and activities are reported for Primary Occupational Activity groups (a grouping of several job classifications similar in content, salary, and opportunity), tenured/tenure track faculty, clinical track faculty, research track
faculty, instructional faculty, women, racial/ethnic minorities, individuals who have disabilities, and veterans.

This report also uses federal guidelines prescribed by the Office of Federal Contract Compliance Programs.

From November 1, 2017 to November 1, 2018, the University of Iowa workforce increased by 241 individuals (1.3%), from 18,359 to 18,600.

◆ The faculty and staff increased by 206 women (1.7%).
◆ Racial/ethnic minority representation increased by 146 individuals (6.2%).
◆ There was a decrease of 27 tenured/tenure track faculty (2.0%).
◆ The number of women faculty members on the tenure track increased by 7 (1.6%), increasing representation from 32.7% to 33.9%.
◆ The number of minority faculty members on the tenure track increased by 9 (3.0%), increasing representation from 21.8% to 22.9%.
◆ Female representation among executive, administrative, and managerial staff decreased by 13 (7.3%), from 47.1% in 2017 to 45.6% in 2018.
◆ The number of racial/ethnic minorities among executive, administrative, and managerial staff did not change; because this primary occupational group overall decreased in size by 4.2%, minority representation increased from 9.5% in 2017 to 9.9% in 2018.
◆ Minority representation among professional and scientific staff increased by 39 individuals (4.0%), increasing representation from 9.1% to 9.3%.
◆ During the 2017-18 data year, the university hired or promoted 1,917 women and 525 racial/ethnic minorities. Despite this level of hiring, varied degrees of underrepresentation of women and minorities remain in individual job groups within the majority of the Primary Occupational Activity (POA) groups. With all job groups aggregated, the university is currently underrepresented by 401 women (2.2%) and by 201 minorities (1.1%).
◆ There was a net increase of three individuals (2.4%) who self-reported having disabilities.
◆ There were small increases in the numbers of disabled veterans (1 individual) and recently separated veterans (1 individual). The number of Active Duty Wartime or Campaign Badge veterans decreased by 29 (7.1%), and there was no change in the number of Armed Forces Service Medal veterans.

For more information, see EOD’s Annual Equal Employment Opportunity and Affirmative Action Workforce Report to the Board of Regents, State of Iowa, Nov. 2018.

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2 Underrepresentation is defined as having fewer women or minorities in a particular job group or department than would reasonably be expected by their availability.
II. Summary of Relevant Data

Learning and Program Outcomes

See the section on Harassment Prevention Education, Section III, Overview of Standards, on page 13 of this report.

Usage and Access

See the section on Key Data Points, Internal and External Complaints Filed with EOD, Section I, Departmental Introduction, on page 6 of this report.

Certifications

EOD staff members typically have the opportunity to attend campus, regional, and national professional development opportunities each year. In particular, EOD staff who conduct complaint investigations or have responsibility for civil rights compliance are encouraged and supported with their professional development efforts, including completing a variety of professional certifications.

Jennifer Modestou
   Human Resources Certification Institute (HRCI): Senior Professional in Human Resources (SPHR)
   Society for Human Resources Management (SHRM): SHRM-Senior Certified Professional (SHRM-SCP)
   American Association for Access, Equity, and Diversity: Sr.-Certified Affirmative Action Professional (Sr. CAAP)
   ATIXA – Civil Rights Investigator Levels I and II
   AIRS-Certified Diversity Recruiter (AIRS-CDR)
   AIRS- Professional Recruiter Certification (AIRS-PRC)

Tiffini Stevenson Earl, JD
   Great Plains Center- ADA Coordinator Certification
   Association of Title IX Administrators (ATIXA): Title IX Investigator

Steve Wehling, JD, MBA
   ATIXA – Civil Rights Investigator Levels I, II, and III
   ATIXA – Title IX Coordinator

Connie Schriver Cervantes, JD
   Association of Title IX Administrators (ATIXA): Title IX Investigator, Civil Rights Investigator Level II, Title IX Coordinator Level III

Wanda Malden, M.S.ED.
   American Association for Access, Equity, and Diversity: Sr.-Certified Affirmative Action Professional (Sr. CAAP)
   AIRS- Professional Recruiter Certification (AIRS-PRC)
Memberships

Jennifer Modestou
  Society for Human Resources Management (SHRM)
  College and Universities Professional Association for Human Resources (CUPA-HR)
  Association of Title IX Administrators (ATIXA)
  American Association for Access, Equity, and Diversity (AAAED)
  Association on Higher Education and Disability (AHEAD)

Tiffini Stevenson Earl, JD
  National Association of College and University Attorneys (NACUA)
  Association of Title IX Administrators (ATIXA)
  Association on Higher Education and Disability (AHEAD)

Steve Wehling, JD, MBA
  National Association of College and University Attorneys (NACUA)
  Association of Title IX Administrators (ATIXA)
  Iowa Bar Association
  Clinton County Bar Association
  Chair, Clinton County Human Rights Commission

Connie Schriver Cervantes, JD
  National Association of College and University Attorneys (NACUA)
  Association of Title IX Administrators (ATIXA)
  Iowa Bar Association
  Scott County Bar Association

Wanda Malden, M.S.Ed.
  American Association for Access, Equity, and Diversity (AAAED) - Board Member and Chair, Professional Development Training Institute
  Society for Human Resources Management (SHRM)

Jill Robinson
  American Association for Access, Equity, and Diversity (AAAED)

Tobey Kelly
  Society for Human Resources Management (SHRM)
III. Overview of Standards

Departmental Mission

The Office of Equal Opportunity and Diversity (EOD) supports a campus environment where each individual's ideas, contributions, and goals are respected and valued. EOD is charged with implementation of equal opportunity, affirmative action, and diversity policies at the University of Iowa. We serve as a resource to support the university's compliance with federal/state laws and regulations and university policies prohibiting discrimination, harassment, retaliation, and sexual harassment by or towards any UI community member.

Departmental Programs

Complaint Investigations Unit (CIU)

Led by Tiffini Stevenson Earl, JD, the CIU consists of three staff members, all of whom have a JD degree from a U.S. university. Due to heavy workloads, and the need to provide a more timely response to complaints, the unit is re-launching a search to hire another compliance coordinator/investigator.

The staff serve as neutral investigators to investigate allegations of prohibited harassment, discrimination, or unfair or inequitable treatment by or towards any UI community member, or person utilizing a UI service, activity, or program, in violation of the university's policies. The staff also provide guidance to university administrators working to resolve concerns in their designated work areas. The CIU provides services related to the following UI Community Policies: Human Rights, Anti-Harassment, Consensual Relationships Involving Students, Violence, Sexual Harassment, and Anti-Retaliation.

The CIU staff also provide harassment and discrimination prevention training to UI employees, helping to educate the UI community on university policies that prohibit discrimination and harassment. EOD staff member, Wanda Malden, also assists the CIU and conducts harassment and discrimination prevention training for UI employees.

As the university’s workforce and students populations have grown, EOD has needed to increase the number of complaint investigators within the CIU. The increased focus locally and nationally on Title IX issues has also led to an increased volume of complaints and scrutiny from local communities and state/national civil rights agencies. EOD’s Annual Complaint Report provides detailed statistics about complaint volume, trends in areas of reported concerns at UI, and summaries of complaint resolutions.

The CIU team is committed to providing exceptional service to the UI community and to engaging in a high level of continuing education to maintain its expertise in employment law and civil rights regulations. The EOD director and CIU investigators have an excellent collaborative relationship with their colleagues in the Office of the Sexual Misconduct Response Coordinator (OSMRC), Office of Student Accountability (OSA), University Human Resources (UHR), Office of the Provost, UI Police, and the General Counsel’s Office. Maintaining that high standard of collaboration and accountability is key to ensuring our offices work collaboratively and that we deliver a coordinated campus response to reports of harassment and discrimination at UI.
Stevenson Earl also serves as the university’s ADA coordinator, and is responsible for coordinating the University of Iowa’s efforts to comply with Title II of the Americans with Disabilities Act, as Amended, and to investigate any complaints that the university has violated Title II. The ADA coordinator works closely with the associate vice president for diversity, equity, and inclusion to coordinate the meetings and activities of UI’s Disability Planning and Action Committee (DPAC). This committee leads and coordinates the university’s efforts to provide access to members of the university community with disabilities. DPAC strategizes and develops long-term plans for access in areas of infrastructure and technology and monitors the institution’s ADA compliance. DPAC works in partnership with various units across the university to ensure that disability services are available for students, employees, and campus visitors.

Equal Employment Opportunity / Affirmative Action Compliance Unit (EEO/AA)

EOD’s EEO/AA compliance staff monitor the recruitment process for faculty and professional and scientific (P&S) staff positions at the University of Iowa. Led by Wanda Malden and Jennifer Modestou, unit staff members consult with search committee chairs and human resources recruiters to assist them in their search-related activities. Staff also provide training programs to search committee members and administrative support personnel on the university policies and procedures related to searches. During FY 2018, the EEO/Affirmative Action Compliance Unit reviewed and approved Workflow search documents associated with 249 faculty requisitions and 1,340 P&S requisitions.

According to EOD’s Annual Diversity Report to the Board of Regents, State of Iowa, November 2018, during the 2017-18 data year, the university hired or promoted 1,917 women and 525 racial/ethnic minorities. During this same period, the report indicates that the university’s workforce increased by 241 individuals (1.3%), from 18,359 to 18,600. The number of female faculty and staff increased by 206 (1.7%) and the number of racial/ethnic minority faculty and staff increased by 146 (6.2%).

EOD staff members work closely with the Provost’s Office and University Human Resources and serve on multiple Talent@Iowa committees including the Talent@Iowa Governance Council, Talent Acquisition Engagement Committee, FMLA and Leave Management, IT Transition, Talent Acquisition, Policy, Succession Planning, and Compensation and Classification.

EOD’s administrative support coordinator, Tobey Kelly, provides valuable guidance and feedback to the HR recruiters and other HR staff who inquire with the office. Additionally, Tobey assists with training the student reception staff for the office.

In Fall 2018, the university implemented Oracle Talent Acquisition in the Cloud (OTAC), a cloud-based online recruitment and application system, for P&S positions, prompting changes to the recruitment process. University Human Resources (UHR) now reviews requisitions to ensure that appropriate outreach efforts are made to attract women and minority applicants. Where underrepresentation of women and/or minorities exists, UHR works with search committees to advertise the vacancy using recruitment resources targeted toward women.

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and/or minorities. HR recruiters and senior HR leaders are tasked with ensuring compliance with EEO/AA principles and policies at the offer stage.

EOD worked closely with UHR and the Office of the General Counsel to ensure the new recruiting tool meets all applicable EEO/AA federal and state laws and UI policies. EOD continues to monitor the recruitment process for P&S positions by conducting post-transaction reviews and audits, providing feedback to UHR and UI Health Care HR as appropriate.

EOD’s program coordinator, Jill Robinson, and director, Jennifer Modestou, are responsible for preparing numerous workforce reports for EOD and the DDEI, including the university’s Affirmative Action Plan; Annual Diversity Report to the Board of Regents, State of Iowa; Annual Complaints Report; VETS 4212 (to the U.S. Department of Labor), as well as responding to numerous ad-hoc requests for the DDEI. In addition, they respond to a variety of data requests on the diversity of UI’s workforce from collegiate deans/VPs and individual faculty/departments preparing grant applications or seeking EEO/AA certifications for their federal grants and contracts. Robinson provides support to all EOD staff for their database and specialized reporting needs. Robinson and Modestou would serve as the primary points of contact for response to any notice of audit by the Office of Federal Contract Compliance Programs (OFCCP).

**Diversity Catalyst Award**

Sponsored by the DDEI and EOD, the Diversity Catalyst Awards are the premier diversity awards on the UI campus and an important annual celebration for diverse communities. The annual reception and awards program is designed to honor faculty or staff members, programs or departments, and students or student organizations engaged in diversity initiatives during the previous academic year that have promoted the development of an inclusive, diverse campus community at the University of Iowa. The next annual celebration on April 3, 2019, will mark the 20th annual celebration of UI’s Diversity Catalyst Awards.

Through their dedication, passion, and collaboration, each year’s award recipients have pushed for sustained transformation and enhancements to our living, learning, and working communities. It is a privilege to be able to honor these individuals for their many contributions to creating an inclusive campus community. Since the awards inception in 1999, the Diversity Catalyst Awards have recognized 24 faculty, 21 staff, 13 students, four student organizations, and 13 departments/units for their exemplary diversity efforts and achievements.

**Harassment Prevention Education**

The University of Iowa mandates education of its employees to 1) ensure that alleged victims (and potential victims) are aware of their rights; 2) notify individuals of conduct that is proscribed; 3) inform administrators about the proper way to address complaints of violations of this policy; and 4) educate the community about the problems this policy addresses.

All faculty, staff, and students meeting the following criteria are required to complete an approved course offered by the University on harassment prevention.

1. All faculty, any title, who hold at least a 50 percent appointment
2. All regular staff (P&S and Merit) employed at least 50 percent or greater time
3. Medical residents and fellows: All who hold at least a 50 percent appointment during the academic year
4. Postdoctoral scholars/fellows: All who hold at least a 50 percent appointment during the academic year
5. Students (graduate/professional): All graduate/professional students who hold a teaching assistantship for a period of one semester or longer, and any other students as determined by the Provost
6. Students (undergraduate): University housing resident assistants, and any other students as determined by the Office of the Vice President for Student Life

During FY 2018, a total of 8,256 individuals completed one of the approved harassment prevention courses; of these, 69 percent completed an online training and 31 percent attended in-person training. As of June 30, 2018, 100 percent of UI employees currently covered by the educational mandate were compliant with the mandate for periodic training on harassment prevention.

**Recruitment Ambassadors Program**

The Recruitment Ambassadors Program, previously sponsored jointly by University Human Resources and the Office of Equal Opportunity and Diversity, supports the university’s strategic goals for increasing the diversity of staff. Recruitment ambassadors are current or former staff members who volunteer to help recruit diverse prospective employees. Through personal contact and participation in campus-sponsored events, Recruitment Ambassadors act as liaisons between candidates and the university, and highlight various outstanding attributes that make the University of Iowa an employer of choice.

In this program, led by EOD staff member Wanda Malden, Recruitment Ambassadors receive training and are equipped to share information about their employee experience, provide resources about UI and the local communities, and answer candidates’ questions on topics ranging from the area’s arts and culture, housing, school systems, dining and shopping, sports and recreation, and health care, to name just a few.

During FY 2019, the program is being revitalized by the Division of Diversity, Equity, and Inclusion and includes a direct collaboration with the Diversity Resources team to assist in the training and development of employees serving as recruitment ambassadors for staff searches.

For more information, visit [https://diversity.uiowa.edu/programs/recruitment-ambassadors-program](https://diversity.uiowa.edu/programs/recruitment-ambassadors-program).

**EOD Collaborations**

EOD staff participate on a wide variety of committees and initiatives in partnership with offices both within the DDEI and with other colleges and organizational units. Examples of some of the committees on which EOD staff members participate on an ongoing basis include:

◆ Title IX Team  
◆ Anti-Violence Coalition and its subcommittees on Campus Education, Policy-Procedures Success Measures Workgroup, and Strategic Plan Writing Committee  
◆ Campus Inclusion Team Advisory Board  
◆ Council on the Status of Women- ex-officio member  
◆ Council on Disability Awareness- ex-officio member  
◆ Center for Diversity and Enrichment Graduation Planning Committee  
◆ Disability Planning and Action Committee, and its Above and Beyond Award planning committee
The following are examples of a few of such initiatives and collaborations.

**UI-CERB (Cognitive, Emotion Regulation, and Behavioral skills) Program**

An example of the EOD Office’s strong commitment to its partnership with the Office of the Sexual Misconduct Response Coordinator (OSMRC) is the participation of EOD staff member, Wanda Malden, as a facilitator in their exciting new initiative called UI-CERB.

UI-CERB is an educational program for students who have been found responsible for sexual misconduct, dating violence, or stalking. The purpose of the program is to prevent reoccurrence by increasing the use of respectful, adaptive, healthy behaviors in relationships. Facilitators work one-on-one to guide a student to make different choices and to engage in behaviors consistent with the student’s personal values. Students develop cognitive, emotion regulation, and behavioral skills to observe and work with their own thoughts and feelings, as well as improve their ability to communicate and resolve conflicts.

UI-CERB is completed in approximately 16 sessions with a trained facilitator. Each session is approximately one hour long. UI-CERB may not be used as a replacement for court-ordered domestic violence counseling.

The OSMRC [UI-CERB website](#) provides additional details about the program.

**Talent Acquisition@Iowa Engage Committee**

Committee Charge: *Engage Committee Charge: Research, propose, and implement strategies and tools to engage and cultivate talent pipelines for the University of Iowa.*

The Talent Acquisition@Iowa project aims to enhance the university’s capacity to hire top faculty and staff. It proposes a comprehensive, coordinated approach to employer marketing, candidate engagement, and recruitment that informs new systems, processes, and services. The new talent acquisition strategy emphasizes strategic initiatives in three focus areas, attract, engage, and recruit, including implementation of a new system to replace Jobs@UIOWA. Three committees were formed to address the aforementioned focus areas.

The Engage Committee, led by co-chairs Wanda Malden and Shamika Patterson from UI Carver College of Medicine, recommended to the Talent Acquisition@Iowa Governing Council to develop:

1. A professional student track for undergraduate and graduate students to use as a pipeline to employ UI graduates. The professional student track program’s purpose is twofold:
   a. To serve as a catalyst to enhance students’ knowledge acquired in the classroom by providing valuable work experience, and
b. To provide students with an opportunity to hone their skills, and meet UI search basic qualifications for entry level human resources, and diversity, equity, and inclusion positions, and to participate in a competitive career searches.

2) A more robust tuition assistance professional development program by working with UI Staff Council to propose appropriate allocations.

The Engage Committee is working with Staff Council’s HR committee, University Human Resources, and the Higher Education and Student Affairs (HESA) Capstone to propose a plan to senior leadership on ways to implement the aforementioned recommendations.

Disability Planning and Action Committee (DPAC)

The Disability Planning and Action Committee (DPAC) leads and coordinates the University of Iowa's efforts to provide access to members of the university community with disabilities. DPAC strategizes and develops long-term plans for access in areas of infrastructure and technology and monitors the institution’s ADA compliance. DPAC works in partnership with various units across the university to ensure that disability services are available for students, employees, and campus visitors. Two EOD staff members, Tiffini Stevenson Earl and Jennifer Modestou, actively participate on the DPAC.

Above and Beyond Award

Each year, the University of Iowa Disability Planning and Action Committee (DPAC) recognizes an individual(s) for their innovative and distinctive efforts to enhance the opportunities of individuals with disabilities at the University of Iowa by presenting them with the Above and Beyond Award. DPAC is seeking nominations for this year's award, which will be presented during the 2019 Annual Disability Celebration.

Annual P&S (Non-organized) Salary Equity Analysis

The University of Iowa reviews annually the equity of salaries of non-organized Professional and Scientific (P&S) staff to ensure that the university’s compensation procedures and practices are applied uniformly and consistently to each employee, regardless of sex or racial/ethnic minority status.

The salary equity committee is comprised of staff from the Office of Equal Opportunity and Diversity (Director Jennifer Modestou and Program Coordinator Jill Robinson) and the Department of Human Resources Compensation and Classification Unit (Director Trevor Glanz and Compensation Specialist Jiongting Hu). Professor Joseph Lang of the Statistics and Actuarial Science Department performs the initial statistical analyses and provides consultation for the review.

The report describes the salary equity review process, findings, and recommendations for corrective action.

Trans Inclusivity Taskforce

Jill Robinson of the EOD Office participates on the UI Trans Inclusivity Taskforce. Convened by the Chief Diversity Office and the Division of Student Life in August 2016, the UI Trans Inclusivity Taskforce continues to deepen and connect the good work happening on campus.
related to increasing inclusivity efforts for transgender (trans) communities. The taskforce is broad in its scope, boasting a multidisciplinary membership of 17 people from across campus.

Its charge is to:

◆ Identify and assess existing and needed services, supports, and policies that promote trans inclusivity, including but not limited to those for trans individuals, and for educational, curricular, and cultural climate development;
◆ Assist units to develop, implement, and assess action plans that provide needed services, supports and policies; and
◆ Provide technical assistance, education, best practices, and other supports to units.

Organization and Leadership

The EOD staff is presently comprised of seven professional and scientific (P&S) staff members and five student employees. All of EOD’s P&S staff are appointed at 100% effort. Student employees may work no more than 20 hours per week during the academic year.

Director:
Jennifer Modestou, SPHR, SHRM-SCP, AIRS-CDR, AIRS-PRC
Director and Deputy Title IX Coordinator

Complaint Investigations Unit (CIU):
Tiffini Stevenson Earl, JD
Compliance Specialist and ADA Coordinator
Connie Schriver Cervantes, JD
Compliance Coordinator
Steve Wehling, JD, MBA
Compliance Coordinator

EEO/Affirmative Action (EEO/AA) Compliance Unit:
Wanda Malden, M.S. ED.
Senior Equal Employment Opportunity Coordinator
Jill Robinson
Program Coordinator
Tobey Kelly
Administrative Services Coordinator

Student staff:
Reception: .63 FTE
Data Entry: .25 FTE

Human Resources

Professional and Scientific staff positions in EOD are filled by conducting a regular search, following the university’s standard policies and practices in the Human Resources section of the university’s Operations Manual. The department utilizes targeted recruitment resources and strategies to attract a diverse applicant pool for their staff recruitments.

The Operations Manual is the most current statement of University of Iowa policy. All revisions have been made in compliance with the Protocol for Approval of University Policies for the University of Iowa Operations Manual.
The University of Iowa is governed by state and federal law, administrative regulations, and policies of the Board of Regents, State of Iowa, which provide broad direction on university affairs. This University of Iowa Operations Manual contains university administrative, financial, and community policies, as well as certain university-level implementing procedures. These policies and procedures have been developed to supplement and clarify Regents policy and to incorporate specific requirements of federal, state, and administrative rules and regulations.

Staff recruitment decisions and offer letters are reviewed and approved by EOD and DDEI leadership, along with University Human Resources staff. EOD employees are provided access to professional development opportunities consistent with their professional role and job expectations. In accordance with university policies, P&S staff may request flexible work arrangements to permit them to balance their professional and family obligations.

Newly hired staff receive onboarding by their supervisor, by other EOD and DDEI staff as appropriate, by DDEI’s senior HR leader, and by University Human Resources. Staff are provided resources as needed to fulfill their responsibilities, including access to institutional policies, records, and technology.

Consistent with university policies, the performance of EOD staff is evaluated in writing annually, and supervisors meet at least annually with their direct reports to address any performance issues, evaluate prior year goals and develop performance goals for the coming year, and discuss related professional development needs and interests. Supervisors are encouraged to meet with their direct reports on a regular basis.

Ethics

EOD staff are bound by the university’s policies as delineated in the University’s Operations Manual, including:

- Chapter 8 – Conflict of Interest in Employment (Nepotism)
- Chapter 16 – Ethics and Responsibilities for University of Iowa Staff
- Chapter 18 – Conflicts of Commitment and Interest

As are all other DDEI staff, the EOD staff members are bound by any division or departmental work rules, such as the CDO Communications Protocol-Media Requests, CDO Communications Protocol for Responding to Hate-related Vandalism, CDO Professional Appearance Policy, and Request for Conference or Activity Attendance policy.

Law, Policy, and Governance

Consistent with university policy and the federal regulations implementing Executive Order 11246 from the OFCCP, the Office of Equal Opportunity and Diversity’s responsibilities include:

- Participating in the development of university policy pertaining to equal employment opportunity and affirmative action;
- Establishing unit and department affirmative action goals and objectives;
- Developing and assessing action-oriented programs to attain established goals and objectives;
◆ Designing and implementing audit and reporting systems to measure the effectiveness of the Affirmative Action Program;
◆ Identifying problem areas of discrimination or inequity and the determination of appropriate solutions and/or corrective action;
◆ Investigating complaints of discrimination or harassment and, where necessary, recommending to the administration of steps to be taken to resolve the complaints;
◆ Facilitating the provision of reasonable accommodations for people with disabilities;
◆ Reviewing hiring and promotion patterns to remove impediments to the attainment of goals and objectives;
◆ Monitoring the recruitment process for regular faculty and P&S positions to ensure all applicants are being fairly considered in the hiring process;
◆ Developing programs to ensure that the university's employment policies and programs are in compliance with federal and state regulations and guidelines;
◆ Conducting statistical analyses related to affirmative action and employment practices at the University of Iowa;
◆ Informing the university’s administration regarding the latest developments in the area of equal employment opportunity and affirmative action law/compliance; and
◆ Partnering with the Division of Diversity, Equity, and Inclusion and University Human Resources to provide education for university faculty, staff, and students on harassment and discrimination prevention and response.

In accordance with the regulations for federal contractors under Executive Order 11246, as amended, EOD develops and disseminates the University of Iowa’s annual Affirmative Action Plan. The ultimate responsibility for equal employment opportunity and affirmative action at the University of Iowa lies with the Board of Regents, State of Iowa, and the president of the university. Implementation and day-to-day administration of the policies are responsibilities of the associate vice president for diversity, equity, and inclusion; the director of the Office of Equal Opportunity and Diversity; the associate vice president and chief human resources officer; and the associate provost for faculty. Goals and objectives are attained, however, through the full cooperation, support, and good-faith effort of all deans, directors, departmental executive officers, supervisors, and others responsible for human resources decisions.

EOD is charged with monitoring the effectiveness of the university’s affirmative action plan. That responsibility includes:

◆ Annually updating the university’s Affirmative Action Plan;
◆ Analyzing the university's workforce by organizational unit and job group to determine whether there are issues with utilization (employment in the department or job group) or distribution (placement in the different jobs within the unit or group) of women or minorities;
◆ Analyzing the university’s applicant flow, hires, terminations, promotions and other human resources actions to determine whether there are selection disparities;
◆ Analyzing the university’s compensation system to determine whether there are disparities based on sex or race/ethnicity;
◆ Analyzing the university’s selection, recruitment, referral, and other human resources procedures to determine whether they result in disparities in the employment or advancement of women or minorities;
◆ Developing and implementing monitoring and reporting systems to measure the effectiveness of the university’s Affirmative Action Program;
◆ Reviewing the results of the monitoring and reporting system with all levels of management and advising top management of program effectiveness;
◆ Submitting recommendations to improve unsatisfactory performance if it occurs; and
◆ Serving as liaison between the university and civil rights enforcement agencies.

Applicable federal laws/regulations include:

◆ Equal Pay Act of 1963 (EPA)
◆ Title IV of the Civil Rights Act of 1964 (Title IV)
◆ Title VI of the Civil Rights Act of 1964 (Title VI)
◆ Title VII of the Civil Rights Act of 1964 (Title VII)
◆ Executive Order 11246 of 1965, as amended (EO 11246) Affirmative Action Plan
◆ Age Discrimination in Employment Act of 1967 (ADEA)
◆ Title IX of the Education Amendments Act of 1972 (Title IX)
◆ Sections 503 and 504 of the Rehabilitation Act of 1973, as amended (Section 503/Section 504) Affirmative Action Plan for Individuals with Disabilities
◆ Pregnancy Discrimination Act of 1978 (PDA)
◆ Americans with Disabilities Act of 1990 as amended (ADA) and
◆ Genetic Information Nondiscrimination Act of 2008 (GINA)
◆ Lily Ledbetter Fair Pay Act of 2009

Applicable state laws/regulations include:

◆ Iowa Civil Rights Act of 1965 (ICRA)
◆ Iowa Executive Order #15 of 1973
◆ Iowa Executive Order #46 of 1982
◆ Iowa Code, Chapter 35C, Veterans Preference

Applicable University of Iowa Community Policies or statements (See UI Operations Manual):

◆ Chapter 3 – Human Rights
◆ Chapter 4 – Sexual Harassment
◆ Chapter 5 – Consensual Relationships Involving Students
◆ Chapter 6 – Nondiscrimination Statement
◆ Chapter 7 – Disability Protection Policy and Accessibility Statement
◆ Chapter 8 – Affirmative Action and Equal Employment Opportunity Statement of Policy and Purpose; Statement on Diversity
◆ Chapter 10 – Violence
◆ Chapter 11 – Anti-Retaliation
◆ Chapter 14 – Anti-Harassment

Applicable University of Iowa Human Resources Policies (see UI Operations Manual):

◆ Chapter 3 – Professional and Scientific Staff
  3.3 Guidelines for Employment of Professional and Scientific Research Staff Members
◆ Chapter 9 – Hiring and Appointments
  9.6 Affirmative Action Employment Guidelines
  9.8 Diversity in Employment Guidelines
**Oracle Talent Acquisition in the Cloud (OTAC)**

EOD staff have participated extensively in UHR’s Talent Acquisition@Iowa project. The university’s new system for managing job advertising, applications, and searches launched Sept. 10, 2018, initially affecting regular staff and health care positions.

The Talent Acquisition@Iowa project aims to enhance the university’s capacity to hire top faculty and staff. It proposes a comprehensive, coordinated approach to employer marketing, candidate engagement, and recruitment that informs new systems, processes, and services. Talent Acquisition@Iowa responds to the UI strategic plan’s focus on faculty and staff recruitment and the Talent@Iowa task force’s emphasis on talent acquisition as the university’s highest human resources priority.

The Talent Acquisition@Iowa project includes purchase and implementation of Oracle Talent Acquisition Cloud, or OTAC, which will replace functions currently provided by the Jobs@UIowa system.

UHR has recently developed and issued a new Talent Acquisition Procedures Manual to the HR recruiters and senior HR leaders who have responsibility for initiating and managing recruitments for staff positions at UI. These standard operating procedures provide the basic policy and guidance for regular P&S and Merit staff recruitment. A Compliance Roadmap for recruitment and employment practices for the university is included in the manual and includes substantial information about EOD’s compliance responsibilities in this area.


**University of Iowa Recruitment Systems and Practices**

The EOD Director and staff continue to provide support to UHR, HR recruiters and senior HR leaders who have responsibility for initiating and managing recruitment and selection for staff and faculty positions. EOD staff consult and provide recommendations to ensure that fair and equitable selection and hiring practices are implemented in accordance with the Uniform Guidelines on Employee Selection Procedures adopted jointly by the Equal Employment Opportunity Commission, the Civil Service Commission, the Department of Labor, and the Department of Justice.

**Diversity, Equity and Access**

In its provision of programs and services, the EOD office and its staff adhere to all applicable federal and state laws/regulations and University of Iowa / Board of Regents policies, including the university’s Human Rights and Anti-harassment policies, that prohibit discrimination or harassment on the basis of race, creed, color, religion, national origin, age, sex, pregnancy, disability, genetic information, status as a U.S. veteran, service in the U.S. military, sexual orientation, gender identity, associational preferences, or any other classification that deprives the person of consideration as an individual, and provides that equal opportunity and access to facilities shall be available to all.
Institutional and External Relations

Internal Relations

EOD staff members participate on numerous committees at the university to establish and promote effective relations with other administrative offices and governance groups at the university. This work helps to garner support for DEI initiatives and proposals with others within the university administration.

See the section above on EOD Collaborations, Section III- Overview of Standards, on page 14, for a representative listing of committee and organizations with which EOD staff serve/participate.

External Relations

External organizations with which EOD staff routinely participate include the Iowa Bar Association, American Association for Access, Equity, and Diversity, Association of Title IX Administrators, Big Ten Academic Alliance, Society for Human Resources Management (SHRM), Iowa SHRM, and the American Association of University Women.

Financial Resources

The EOD staff follow all applicable university policies and practices in the delivery of their programs and services. The DDEI finance director and the AVP-DEI review budget requests prior to allocation of funds to EOD. Staff who are issued a procurement card for purchasing must complete online training from the university prior to use of their credit card. Monthly reconciliation of credit card statements is required and processed by staff in the university’s Shared Services Center.

Similarly, EOD staff who travel on university business must follow all applicable university policies on travel, including adhering to per diem limits for travel expenses. Travel expense vouchers must be completed following business travel if requesting reimbursement of travel expenditures. Travel expense vouchers are reviewed and approved by supervisory personnel and Shared Services staff.

FY 2019 Budget for the Office of Equal Opportunity and Diversity:

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<thead>
<tr>
<th>Description</th>
<th>Amount</th>
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<td>Salaries and Fringe Benefits</td>
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<tr>
<td><strong>Grand Total</strong></td>
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Technology

In addition to standard Microsoft Office desktop tools, the EOD staff utilize several specialized programs for their EEO/AA compliance work including PeopleFluent AAPlanner, Broadbean, Oracle Talent Acquisition in the Cloud (OTAC), Oracle Business Intelligence, LocalJobNetwork, and online harassment prevention education content from a contracted external vendor.
EOD has responsibility for providing an online educational program on harassment prevention and response, which it offers in collaboration with UHR and Information Technology Services (ITS) staff and an external vendor. The modules from the external vendor, called Intersections, are embedded in an ICON course available via UI’s Compliance and Qualifications system. Technical support for the online modules is managed by EOD in collaboration with ITS, Compliance Support, UIHC Compliance Support, and the external vendor.

Staff utilize the departmental website, along with that of the DDEI, to provide information to prospective visitors on EOD’s services, location, staffing, programs, and contact information. Access to web portals for the communication of sensitive information are restricted to a select number of departmental staff who have training on handling confidential data.

Per policies and guidance from the university’s Information Technology Services (ITS) department, EOD’s computerized records are backed up regularly on a secure server. EOD staff must sign ITS’s confidentiality agreements annually that restrict the sharing of confidential data and information.

Facilities and Equipment

The EOD suite is located in 202 Jessup Hall, one of the administrative buildings on the UI’s Pentacrest. Other administrative offices with whom the EOD staff collaborate frequently that are also located in Jessup Hall include the Office of the General Counsel, Office of the President, Office of the Provost, and Office of the Vice President for Finance and Operations. The Jessup Hall location is also convenient for UI faculty, staff, and students who may wish to schedule a meeting with one or our investigators. Jessup Hall is located near several campus and community bus stops, public parking ramps, and the downtown area.

Jessup Hall is accessible to persons with disabilities via an elevator on the east side of the building.

EOD staff offices utilize locked filing systems for paper records, along with electronic filing systems that are accessible only to EOD personnel who have been granted access by departmental administration and ITS. EOD computers are maintained by ITS personnel and replaced typically every 3-4 years.

Assessment and Evaluation

EOD’s educational programs that are coordinated with UHR’s Learning and Development Staff utilize an online evaluation form administered by UHR staff. Program instructors receive the results of the online satisfaction surveys.

EOD’s online harassment prevention program has a communications portal through which participants may submit their comments about the program. The EOD director reviews the comments to guide feedback to our IT partners and our external courseware vendor for the program, and to assess the advisability of continuing the partnership with the external vendor.
IV. Key Issues

Internal Challenges

◆ Sufficient staffing to address Title IX and other civil rights complaints in a more timely manner. Given the workload and increasing demands on the CIU, EOD is in the process of hiring an additional investigator.

◆ Ensuring support for the continued inclusion of the EOD office within the DDEI administrative structure. The staff firmly believes this organizational structure provides the best alignment for the services of the Complaint Investigations and EEO/Affirmative Action compliance units.

◆ Developing compliance reports from the new OTAC system. EOD’s ability to obtain data from the OTAC system in order to prepare required compliance reports has proven more challenging than anticipated. Efforts are underway to assess whether a new software program or consultant services will be necessary in order to extract the needed data in a format that is usable for higher education institutions.

◆ Improving the user experience with the online harassment prevention educational program. Employees in some areas of campus, particularly those who work in patient care areas of the hospital, report difficulty in accessing this online course. Efforts continue to work with the vendor, our university IT partners, and external vendors for UI’s learning management system to identify and implement improvements. Resolving the technical support issues for the online courses would help to reduce the burden on EOD staff.

◆ One of the current goals identified in UI Anti-Violence Coalition’s Two-Year Plan that EOD staff will participate on is to evaluate UI community policies and Student Judicial Procedure to identify opportunities for clarifying, simplifying, and aligning language across policies for consistency; aligning appeal processes and procedures; reviewing the procedures for interim measures; educational/training requirements; post-investigation procedures, including sanctioning; the intersection of complementary policies (HR, work rules, departmental policies); and the utilization of joint investigations between the Office of Equal Opportunity and Diversity and University Human Resources.

◆ Funding of employee accommodations under the ADA. EOD and UHR are working to identify funding sources in order to develop a central pool of funds for disability accommodations requests from UI employees, in order to relieve some of the financial stress on smaller departments.

◆ Garnering greater support for incorporating concepts of universal design into UI construction and renovation projects.

External Challenges

◆ Increased pressure both locally and nationally to address the issues of sexual violence, dating/domestic violence, and stalking on college campuses, along with other areas of protected class harassment and discrimination.
We should expect continued scrutiny from student and governance groups at UI and from local and national media on UI’s efforts to address the problem of sexual violence. The university’s Anti-Violence Plan is the guide for our current strategies and priorities. We continue to monitor the campus and national environment, working with the OSMRC, UI Anti-Violence Coalition, Association of Title IX Administrators / National Center for Higher Education Risk Management Group, and our counterparts at the Big Ten Academic Alliance, the University of Northern Iowa, and Iowa State University, to consider best practices to increase safety and the effectiveness of UI’s response teams.

◆ Changing federal laws/ regulations on Title VII, Title IX, the ADA, and OFCCP compliance

Over the past ten years, there has been an increasing number of regulations for federal contractors issued by the OFCCP and the U.S. Department of Labor. We continue to monitor the federal regulatory environment and collaborate with University Human Resources and the General Counsel’s Office to modify university policy and procedures in line with any newly issued federal regulations. Consultants who specialize in the OFCCP and the federal contracting regulatory environment report that we should anticipate continued attempts by the federal administration to roll back Obama-era regulations and a decreased interest in promulgating new regulations that are perceived to restrict the freedom of small businesses and corporate entities.

Similarly, proposed regulatory changes to Title IX suggest that considerable changes to policies and procedures at higher education institutions could be necessary if the proposed changes are promulgated by the U.S. Department of Education as currently written. EOD staff continues to work closely with OSMRC and the AVC to monitor developments in this area.
Appendix

A. EOD Organizational Chart

B. Talent Acquisition Procedures Manual, including the Compliance Roadmap