

EQUAL EMPLOYMENT OPPORTUNITY POLICY

41 CFR Section 60-300.44(a), 41 CFR Section 60-741.44(a)

It is the policy at The University of Southern California to provide equal employment and advancement opportunities to all qualified individuals. To achieve this goal, The University of Southern California is dedicated to taking affirmative action to employ and advance in employment protected veterans and individuals with disabilities. All personnel actions, including compensation, benefits, recruitment, hiring, training, and promotion of persons in all job titles, are administered without regard to protected veteran or disability status, and all employment decisions are based solely on valid job requirements. In addition, employees and applicants are protected from harassment, threats, coercion, intimidation, or discrimination for:

- 1) Filing a complaint;
- 2) Assisting or participating in an investigation, compliance review, hearing, or any other activity related to the administration of Section 4212, Section 503, or any other Federal, State, or local law requiring equal opportunity for protected veteran or individuals with disabilities;
- 3) Opposing any act or practice made unlawful by Section 4212, Section 503, or any other Federal, State or local law requiring equal opportunity for protected veterans and individuals with disabilities; or
- 4) Exercising any other right protected by Section 4212, Section 503.

This EEO policy has the support of the President, who has assigned responsibility for its implementation to Catherine Spear, Vice President, Office for Equity, Equal Opportunity, and Title IX (EEO-TIX). The University of Southern California has designed and implemented an audit and reporting system to monitor and maintain its compliance with the Acts.

A copy of the Equal Employment Opportunity statement that reaffirms The University of Southern California's commitment to protected veterans and individuals with disabilities is posted in a form that is accessible and understandable to an individual with a disability at <https://policy.usc.edu/discrimination/>.

REVIEW OF PERSONNEL PROCESSES
41 CFR Section 60-300.44(b), 41 CFR Section 60-741.44(b)

The University of Southern California reviews its employment procedures to ensure careful, thorough, and systematic consideration of the job qualifications of protected veterans and applicants with disabilities for job vacancies filled either by hiring or promotion, and for all training opportunities offered or available. This review ensures that personnel procedures do not stereotype protected veterans and individuals with disabilities in a manner that limits their access to all jobs for which they are qualified. Applicants and employees with disabilities have equal access to personnel processes, including those implemented through information and communication technologies. The University of Southern California will provide necessary reasonable accommodation to ensure applicants and employees with disabilities receive equal opportunity in the operation of personnel processes. The University of Southern California periodically reviews its processes, and makes any necessary modifications to ensure its affirmative action obligations are carried out. When protected veterans are considered for employment, only that portion of the individuals' military records, including discharge papers, that is relevant to the requirements of the position will be considered.

USC has used Workday Recruiting to review its recruitment and hiring processes on an annual basis since 2017.

PHYSICAL AND MENTAL QUALIFICATIONS
41 CFR Section 60-300.44(c), 41 CFR Section 60-741.44(c)

The University of Southern California reviews all physical and mental job qualification requirements as openings occur to ensure, to the extent that qualification requirements tend to screen out qualified disabled veterans and qualified individuals with disabilities, that they are job-related and consistent with business necessity and the safe performance of the job.

To the extent that physical or mental job qualification requirements tend to screen out qualified disabled veterans and qualified individuals with disabilities in the selection of employees or applicants for employment or other changes in employment status such as promotion or training, the University of Southern California assures that the requirements are related to the specific job(s) for which the individual is being considered, and are consistent with business necessity and the safe performance of the job.

All operational units that consider specific physical and mental qualifications conduct regular and ongoing reviews of such qualifications to ensure that they are job-related and non-discriminatory.

A central audit of university employment processes is conducted annually in conjunction with the production of the University's affirmative action plans. In this centralized audit process, physical and mental qualifications are reviewed on a rotating basis to ensure job-relatedness and non-discriminatory implementation, as well as to determine if the assessments create any unfairness for particular groups of candidates, including minorities, women, veterans, and individuals with disabilities.

REASONABLE ACCOMMODATION

41 CFR Section 60-300.44(d) , 41 CFR Section 60-741.44(d)

The University of Southern California makes reasonable accommodations to the physical and mental limitations of employees or applicants to the extent that such accommodations do not impose an undue hardship on the conduct of its business. When an employee, known to be a disabled veteran or is an employee with a known disability, has significant difficulty performing his or her job, and it is reasonable to conclude that the performance problem may be related to the known disability, the employee is confidentially notified of the performance problem, and asked if the problem is related to the disability. If the employee indicates that the performance problem is related to his or her disability, the employee is asked if reasonable accommodation is needed.

HARASSMENT

41 CFR Section 60-300.44(e), 41 CFR Section 60-741.44(e)

The University of Southern California develops and maintains policies and procedures to ensure that its employees are not harassed because of their status as a protected veteran, or on the basis of a disability. These policies and procedures are accessible online and will be provided upon an employee's request. See the University's Policy on Prohibited Discrimination, Harassment, and Retaliation at <https://policy.usc.edu/discrimination/>.

EXTERNAL DISSEMINATION OF POLICY
41 CFR Section 60-300.44(f), 41 CFR Section 60-741.44(f)

The University of Southern California undertakes appropriate outreach and positive recruitment activities that are reasonably designed to effectively recruit protected veterans and individuals with disabilities, such as the following:

- 1) The University of Southern California incorporates the Equal Opportunity Clause regarding protected veterans and individuals with disabilities in its purchase orders, leases, and contracts as required by law, executive order, and regulation. Written notification of the Equal Opportunity Policy is sent to all subcontractors, vendors, and suppliers requesting appropriate action on their part. See notice here: <https://businessservices.usc.edu/for-suppliers/forms/affirmative-action/>.
- 2) The University of Southern California notifies all applicants of the EEO policy, and invites them to self-identify. Application forms state The University of Southern California's commitment to equal employment opportunity. All employment advertisements and notices to recruitment sources state this EEO policy.
- 3) Outreach and recruitment activities that may be undertaken as needed by The University of Southern California include enlisting the assistance and support of the following persons and organizations in recruiting, and developing on-the-job training opportunities for protected veterans and individuals with disabilities, in order to fulfill its commitment to provide equal employment opportunity for such individuals:
 - The Local Veterans' Employment Representative in the local employment service office (One-Stop) nearest the contractor's establishment;
 - The Department of Veterans Affairs Regional Office nearest the contractor's establishment;
 - The veterans' counselors and coordinators ("Vet-Reps") on college campuses;
 - The service officers of the national veterans' groups active in the area of the contractor's establishment;
 - Local veterans' groups and veterans' service centers near the contractor's establishment;
 - The National Resource Directory's Veterans Job Bank, or any future service that replaces or complements it;
 - The Department of Defense Transition Assistance Program (TAP), or any subsequent program that, in whole or in part, might replace TAP; and
 - Any organization listed in the Employer Resources section of the National Resource Directory (<http://www.nationalresourcedirectory.gov/>), or any future service that replaces or complements it.
 - The State Vocational Rehabilitation Service Agency (SVRA), State mental health agency, or State developmental disability agency in the area of the contractor's establishment;
 - The Employment One-Stop Career Center (One-Stop) or American Job Center nearest the contractor's establishment;
 - The Department of Veterans Affairs Regional Office nearest the contractor's establishment (www.va.gov);
 - Entities funded by the Department of Labor that provide recruitment or training services for individuals with disabilities, such as the services currently provided through the Employer Assistance and Resource Network (EARN) (www.earnworks.com);

- Targeted job postings through JobTarget, which posts on job boards directed towards women, minorities, individuals with disabilities, and veterans, respectively;
- Local disability groups, organizations, or Centers for Independent Living (CIL) near the contractor's establishment;
- Placement or career offices of educational institutions that specialize in the placement of individuals with disabilities;
- Private recruitment sources, such as professional organizations or employment placement services that specialize in the placement of individuals with disabilities;
- USC Veteran referral program (<https://talent.usc.edu/recruitment/vets/>);
- USC academic programs, such as The USC Marshall School of Business, which are working to increase the pipeline of qualified, educated veterans through programs such as the Master of Business for Veterans ("MBV") program, which may be found here: (<https://www.marshall.usc.edu/programs/specialized-masters-programs/master-business-veterans>);
- Administrators who hold annual recognition events for students, staff, and faculty who are veterans; and
- The University's Veterans Association and Veterans Resource Center, which provide resources and support to the veteran community.

4) All employment openings (except executive and top management, positions that are filled from within, and positions lasting three days or less) are listed at the appropriate state employment services office. Formal briefing sessions and facility tours may be conducted with representatives from recruiting sources to explain current and future job openings, position descriptions, worker specifications, and the selection process. Follow-up with these resources, and feedback on disposition of applicants are conducted when appropriate.

5) The University of Southern California develops internal communication of these outreach efforts in a manner that fosters understanding, acceptance, and support among executive management, supervisors, and all other employees.

6) Meaningful contacts are established with veteran's service organizations and organizations for individuals with disabilities for such purposes as advice, technical assistance, and referral of potential employees. Such assistance may consist of advice concerning proper placement, recruitment, training, and reasonable accommodation.

7) Protected veterans and applicants with known disabilities are considered for all available positions for which they may be qualified.

8) Recruitment at educational institutions includes efforts to reach students who are protected veterans.

9) Recruitment programs established with schools incorporate efforts to reach students with disabilities. Efforts may be made to participate in work-study programs with rehabilitation facilities and schools that specialize in training or educating individuals with disabilities.

10) When appropriate, efforts may be made to participate in work-study programs with Department of Veterans Affairs rehabilitation facilities that specialize in training or educating disabled veterans.

11) Efforts are made to include individuals with disabilities when employees are pictured in consumer, promotional, or help wanted advertisements.

USC provides written notice of its Equal Employment Opportunity and Affirmative Action policy to subcontractors upon entering the contracting relationship, and requests they adhere to the policy.

ASSESSMENT OF EXTERNAL OUTREACH AND RECRUITMENT EFFORTS

41 CFR Section 60-300.44(f)(3), 41 CFR Section 60-741.44(f)(3)

The University of Southern California each year reviews the outreach and recruitment efforts it has taken over the previous twelve months to evaluate its effectiveness in identifying and recruiting qualified protected veterans and qualified individuals with disabilities. Each evaluation is documented, including at a minimum the criteria used to evaluate the effectiveness of each effort and the conclusion as to whether each effort and the totality of the efforts are effective. Among these criteria are the Data Collection Analysis for the current year and the two most recent previous years. If the University of Southern California concludes the totality of its efforts are not effective in identifying and recruiting qualified protected veterans and qualified individuals with disabilities, alternative outreach and recruitment efforts are identified and implemented.

The University of Southern California concludes that each and the totality of its efforts are effective in identifying and recruiting qualified protected veterans and qualified individuals with disabilities.

INTERNAL DISSEMINATION OF POLICY
41 CFR Section 60-300.44(g), 41 CFR Section 60-741.44(g)

The University of Southern California has developed the following internal procedures to communicate its obligation to engage in affirmative action efforts to employ and advance in employment protected veterans and qualified individuals with disabilities. These procedures are designed to foster understanding, acceptance, and support among executive, management, supervisory, and other employees, and to encourage such persons to take the necessary actions to meet this obligation.

1) The University of Southern California Notices. The EEO policy statement is posted on the employee bulletin board and available online at <https://eeotix.usc.edu/notice-of-non-discrimination/>. This notice states the name of the Vice President for the Office for Equity, Equal Opportunity, and Title IX (EEO-TIX), the support of top-level management toward this policy, and to whom questions, comments, or complaints should be directed. A statement is included that employees are protected from coercion, intimidation, interference, or discrimination for filing a complaint or assisting in an investigation under the Acts. All required state and federal EEO notices are also posted on bulletin boards.

2) Union Contracts. A non-discrimination clause is included in any union contracts and any such contracts are reviewed to ensure that they are non-discriminatory. The University of Southern California notifies union officials and/or employee representatives of the University's policy, and requests their cooperation.

3) Other procedures that may be implemented as needed:

a. The University of Southern California's overall commitment, top-level management support, and implementation of the plan are discussed with management personnel, making clear the President's support for the affirmative action policy;

b. All employees and prospective employees are informed of the University of Southern California's commitment to engage in affirmative action to increase employment opportunities for protected veterans and individuals with disabilities;

c. The University of Southern California's affirmative action policy is available online;

d. The policy is discussed thoroughly in both employee orientation and management training programs;

e. When employees are featured in employee handbooks or similar publications for employees, The University of Southern California includes protected veterans and individuals with disabilities.

AUDIT & REPORTING SYSTEM
41 CFR Section 60-300.44(h), 41 CFR Section 60-741.44(h)

The University of Southern California has designed, implemented, and documented an audit and reporting system that:

- 1) Measures the effectiveness of the affirmative action program.
- 2) Indicates any need for remedial action.
- 3) Determines the degree to which the objectives have been attained.
- 4) Determines whether protected veterans and individuals with known disabilities have the opportunity to participate in all company sponsored educational, training, recreational, and social activities.
- 5) Measures compliance with the affirmative action program's specific obligations.
- 6) Documents the actions taken to comply with subparagraphs 1) through 5) and retains the documents as employment records.

Where the affirmative action program is found to be deficient, corrective action is taken to bring the program into compliance.

RESPONSIBILITY FOR IMPLEMENTATION
41 CFR Section 60-300.44(i), 41 CFR Section 60-741.44(i)

Vice President of the Office for Equity, Equal Opportunity, and Title IX (EEO-TIX) Catherine Spear has been designated to direct the activities of the affirmative action program. Vice President Spear has the support of the President in carrying out the University of Southern California affirmative action policy. Specifically, Vice President Spear is responsible for:

- 1) Developing policy statements, affirmative action programs, and internal and external communication to include discussions with managers, supervisors, and employees to ensure the policies are followed;
- 2) Advising managers and supervisors that their work performance is evaluated, in part, on the basis of their affirmative action efforts;
- 3) Identifying and discussing with management any problem areas;
- 4) Developing with management solutions for any identified problem areas;
- 5) Serving as a liaison between the University of Southern California and community groups, governmental agencies, and vocational rehabilitation organizations;
- 6) Maintaining an audit and reporting system to monitor the progress of the affirmative action program;
- 7) Informing management of the latest developments in the affirmative action and equal employment opportunity area;
- 8) Serving as a liaison between The University of Southern California and organizations for protected veterans and individuals with disabilities;
- 9) Assisting in career counseling for protected veterans employees and employees with disabilities;
- 10) Ensuring that the policy statement and required posters are posted on bulletin boards and/or electronic postings; and
- 11) Ensuring that employees placed through these policies are not harassed.

TRAINING

41 CFR Section 60-300.44(j), 41 CFR Section 60-741.44(j)

All personnel involved in recruitment, screening, selection, promotion, discipline, and related processes are trained to ensure the implementation of our commitments made in this affirmative action program.

DATA COLLECTION ANALYSIS
41 CFR Section 60-300.44(k), 41 CFR Section 60-
741.44(k)

The University of Southern California documents the following computations or comparisons pertaining to applicants and hires on an annual basis, and maintains them for a period of three (3) years:

- 1) The number of applicants who self-identified as protected veterans pursuant to § 60-300.42(a), or who are otherwise known as protected veterans;
- 2) The number of applicants who self-identified as individuals with disabilities pursuant to § 60-741.42(a), or who are otherwise known to be individuals with disabilities;
- 3) The total number of job openings and total number of jobs filled;
- 4) The total number of applicants for all jobs;
- 5) The number of protected veteran applicants hired;
- 6) The number of applicants with disabilities hired; and
- 7) The total number of applicants hired.