



2020 - 2021 Equal Employment Opportunity / Affirmative Action Program

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Effective July 1, 2020

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Appendices

Note: Appendices are on file in the Office of Human Resources and are available on request in electronic or print format. As a cost saving measure, they are not included in this printed report.

- Appendix A, Workforce Analysis by Sex, Total Minority, & Individual Race/Ethnicity
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REAFFIRMATION OF COMMITMENT TO EQUAL EDUCATIONAL & EMPLOYMENT OPPORTUNITY

Black Hills State University provides equal educational and employment opportunity for all persons without regard to sex, race, color, creed, national origin, ancestry, citizenship, gender, gender identification, transgender, sexual orientation, religion, age, disability, genetic information, pregnancy, marital status, or veteran status or any other status that is or may become protected under law against discrimination – except where sex, age, or ability constitute bona fide educational or employment qualifications or where marital or veteran status are statutorily defined eligibility criteria for Federal or State benefit programs.

Further, the university seeks to promote campus diversity by enrolling and employing a larger number of women and minorities where these groups have historically been and continue to be under-represented within the university in relation to availability – as well as to veterans with qualifying service and persons with disabilities in relation to national benchmarks.

This affirmation is published in accordance with 41 CFR 60 and is in keeping with Policy 1.19 of the South Dakota Board of Regents, Title VII & Title IX of the Civil Rights Act of 1964, as amended; Executive Order 11246; the Rehabilitation Act of 1973; the Vietnam Era Veterans' Readjustment Assistance Act of 1974; the Civil Rights Restoration Act of 1988; and South Dakota Statutes. In establishing this commitment, the university aims to achieve, within all areas of the university community, a diverse student body, faculty, and staff capable of providing for excellence in the education of its students and for the enrichment of the university community.

UNLAWFUL HARASSMENT, PERSONAL DISCRIMINATION, AND RETALIATION

In keeping with its commitment to equal educational and employment opportunity, Black Hills State University is committed to maintaining a community that is free from harassment or discrimination of any kind that would interfere with an individual's ability to participate fully in the educational and employment activities of the university and expressly prohibits retaliation against any individual for speaking out in support of or participating in any of its non-harassment and non-discrimination programs. For more information on ways in which you can help nurture our multicultural learning community or if you believe you have been subjected to unlawful harassment, personal discrimination, or retaliation, please contact any supervisor or manager (for employment concerns) or any academic advisor or faculty administrator (for student concerns) – or any one of the following University officials:

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**BLACK HILLS STATE UNIVERSITY
2020 – 2021 EEO/AA PROGRAM**

As a Federal contractor by virtue of its research and student financial aid programs subject to the provisions of 41 CFR 60, Black Hills State University is required to undertake an annual evaluation of the representation of women and minorities among its employees in relation to the availability of women and minorities within reasonable recruitment areas and to assess the representation of veterans with qualifying service and individuals with disabilities in relation to national labor market benchmarks.

Beginning in 2016, under the leadership of President Tom Jackson, Jr., Black Hills State University inaugurated a new EEO/AA planning process, supported by contemporary, custom computer support software that enables the University to estimate the labor market availability of women and minorities with greater precision and accuracy than in past years and which will enable more informed decision making among University administrators.

General Purpose and Premise [41 CFR 60-2.10]

– Goal of Affirmation Action Planning

An affirmative action program is a management tool designed to ensure equal employment opportunity. ***A central premise under-lying affirmative action is that, absent discrimination, over time an employer’s work force will reflect the gender, racial, and ethnic profile of the labor markets in which the University recruits.*** Affirmative action programs are based on a quantitative analysis of the employer’s work force in relation to relevant labor markets, as documented in this report.

In the simplest of terms, the objective of the University’s EEO/AA Program over time is for our ***work force to look just like the labor market*** – that is, for the representation of women and minorities at BHSU to reflect their labor market availability, job group by job group. While fluctuations in the representation of women and minorities within the University’s employee complement occur naturally from year to year, by updating our EEO/AA Program on an annual basis, the University is able to highlight the progress we may have made in the past year as well as to identify where continuing improvement is needed.

– Notes regarding Adoption of the EEO/AA Plan Year

Black Hills State University has elected to file its annual EEO/AA plan on a fiscal year basis – from July 1 through June 30 each year – to align with the academic calendar year. The use of a fiscal year (or academic year) plan provides the following advantages in relation to other plan years:

- The University’s annual IPEDS data set is completed on or about March 1 each spring and provides the most accurate data set available for faculty and professional staff than any other reporting cycle used for institutional reporting.

- The IPEDS data set is used for all major institutional reports pertaining to academic personnel and is the primary data source for academic personnel planning. Conforming the annual EEO/AA plan to the annual IPEDS data set ensures consistency among multiple internal and external reports and promotes confidence in administrative assessments.

Workforce Analysis (Organizational Profile) [41 CFR 60-2.11]

– Representation of Women and Minorities by Major Organizational Division

The simplest analysis undertaken in AA planning is to profile the University by identifying staffing patterns of women and minorities in the aggregate, among major divisions of the institution **to identify whether women and minorities enjoy access to employment throughout the organization.**

The desired outcome of a broad organizational profile is for women and minorities to be represented in each organizational unit, provided the unit is of sufficient size to create a statistical expectation of the representation of women and minorities. For representational analysis, a unit generally must have at least 12 incumbents to create a reasonable presumption that both women and minorities will be represented.

It is notable, however, that because the representation of women and minorities in the labor market is correlated to occupational category or profession – and not to internal organizational structure – there is no presumption that the percentage of women or minorities would be uniform throughout internal divisions of the University.

Organizational Profile by Major Division	Total Employees	Number Women	Percent Women	Number Minority	Percent Minority
Office of the President	34	12	35.3%	2	5.9%
Academic Affairs	29	21	72.4%	1	3.5%
• College of Business & Natural Science	39	17	43.6%	11	28.2%
• College of Education & Behavioral Sci	42	27	64.3%	3	7.1%
• College of Liberal Arts	55	19	34.6%	6	10.9%
Student Affairs	30	22	73.3%	5	16.7%
Finance & Administration	67	29	43.3%	6	9.0%
Information Technology	20	7	35.0%	1	5.0%
University Advancement	6	4	66.7%	0	0.0%
Rapid City	11	7	63.6%	0	0.0%
Institution Totals	333	165	53.2%	35	8.6%

All major divisions of Black Hills State University, with the exception of University Advancement meet the size threshold for representational analysis. All major divisions of the University (including University Advancement, despite its smaller size) include the representation of both women and minorities, with the exception of minority representation in the Rapid City facility.

The broad representation of both women and minorities throughout the institution suggests strongly that there are no artificial impediments to either women or minorities participating in employment throughout Black Hills State University.

[See Appendix A, Workforce Analysis, on file in the Office of Human Resources, for an organizational profile prepared according to 41 CFR 60-2.11 including a breakdown of total minority data by individual race and ethnicity.]

Job Group Definition [41 CFR 60-2.12]

– Aggregation of Positions into Job Groups based on Similarity of Job Content, Salary Range, and Opportunity for Progression

A more sophisticated approach to evaluating the representation of women and minorities within the organization is ***to divide the work force into job groups within broad occupational categories across organizational lines***. Job groups are defined on the basis of similarity of job content, salary range, and opportunity for progression within the organization.

The basic classification structure for defining job groups within higher education is the EEO-6 Report, promulgated by the Equal Employment Opportunity commission, with annual data being collected through IPEDS (Integrated Postsecondary Education Data System). EEO-6 categories are noted in the chart below.

EEO Code	Organizational Profile by EEO Category
H10	Executives
H20	Faculty
H30	Technicians/Paraprofessionals
H40	Professionals
H50	Office/Clerical
H60	Skilled Crafts
H70	Service/Maintenance

* Note: In the EEO-6 schema, professional positions are labeled “H30,” while technical and paraprofessional positions are labeled “H40.” Black Hills State University shares a common information system with the State of South Dakota which reverses these job category labels. To maintain consistency between this report and internal data systems, the job code definitions of the State of South Dakota will be retained (as listed above).

In order to provide for meaningful statistical analysis, job groups should be as discrete as possible to ensure similarity of job content, salary range, and opportunity for progression while being of sufficient size to support inferential analysis. Generally, to support inferential analysis, data groups should have 30 incumbents; while the OFCCP will accept a schema for compensation analysis provided 80% of the employee population is captured within job groups consisting of 25 incumbents (and which include at least five women and five minorities where possible).

For heuristic reasons, it is desirable to distinguish different roles among executives and among different academic disciplines for faculty, so as to match incumbent representation of women and minorities to the availability of women and minorities in the labor market – even if this results in job groups less than ideal in minimum size. Consequently, for the purpose of this EEO/AA Plan, Executives will be subdivided into “executive-level” managers and “mid-level managers”, while faculty will be organized by colleges, then by schools within college, as illustrated below.

Job Group	Job Group Definition by EEO Category
VX-10	Executives
11	• Executive-Level Managers
12	• Mid-Level Managers
VX-20	VX-Total Faculty
VX-21	VX-Liberal Arts Faculty
22	• Arts & Humanities Faculty
23	• Math & Soc Sci Faculty
VX-24	VX-Bus & Nat Sci Faculty
25	• Business Faculty
26	• Natural Sci Faculty
VX-27	VX-Education & Beh Sci Faculty
28	• Education Faculty
29	• Behavioral Sci Faculty
30	Technicians/Paraprofessionals
40	Professionals
50	Office/Clerical
60	Skilled Crafts
70	Service/Maintenance
VX-##	= Virtual Job Groups

Note: in this job group schema, it is important to note that employee source data are loaded to “natural” job groups representing actual employees within broad EEO categories. In order to provide multiple organizational “views” of complements of employee by organizational level, natural job groups in the Executive Occupational Category and Faculty Job Category are “rolled up” to create virtual job groups. For example, Executive-Level Managers (11) and Mid-Level Managers (12) are added together to create a single Executive job group (VX-10). To avoid duplicate counting, the “virtual job groups” are denoted by VX-## and are not included in institutional totals.

Among the professorate, there are six schools comprising three colleges. In order to evaluate the representation of women and minorities at the school level (for each director), at the college level (for each dean), and at the institution level (for the provost), we have created both actual and virtual job groups, as above for Executives. Faculty are assigned at the school level. Among these six schools, two schools are combined into each of three colleges. The subtotals of the three colleges are then combined into Total Faculty. The use of both “actual” and “virtual” job groups permits multi-variant analysis, which would not be possible with singular job groups encompassed in traditional EEO/AA plans, where single decision makers are exclusively responsible for achieving proportional representation of women and minorities among job groups.

Job Group Analysis [41 CFR 60-2.13]

– Placement of Incumbents in Job Groups

After defining appropriate job groups based on similarity of job content, salary range, and opportunity, the organization then inventories employees by job group **to determine the number and percentages of women and minorities in each job group**. The assignment of employees to job groups yields the following number and percentage distribution of women and minorities by job group at Black Hills State University.

Job Group	Assignment of Employees to Job Groups	Total Employees	Number Women	Percent Women	Number Minority	Percent Minority
VX-10	Executives	50	24	48.0%	2	4.0%
11	• Executive-Level Mgrs	6	3	50.0%	0	0.0%
12	• Mid-Level Mgrs	44	21	47.7%	2	4.6%
VX-20	VX-Total Faculty	126	52	41.3%	16	12.7%
VX-21	VX-Liberal Arts Faculty	43	13	30.2%	3	7.0%
22	• Arts & Humanities Faculty	27	9	33.3%	1	3.7%
23	• Math & Soc Sci Faculty	16	4	25.0%	2	12.5%
VX-24	VX-Bus & Nat Sci Faculty	50	19	38.0%	11	22.0%
25	• Business Faculty	32	13	40.6%	9	28.1%
26	• Natural Sci Faculty	18	6	33.3%	2	11.1%
VX-27	VX-Education & Beh Sci Faculty	33	20	60.6%	2	6.1%
28	• Education Faculty	15	11	73.3%	0	0.0%
29	• Behavioral Sci Faculty	18	9	50.0%	2	11.1%
30	Technicians/Paraprofessionals	13	4	30.8%	1	7.7%
40	Professionals	75	47	62.7%	9	12.0%
50	Office/Clerical	21	21	100%	2	9.5%
60	Skilled Crafts	7	2	28.6%	0	0.0%
70	Service/Maintenance	41	15	36.6%	5	12.2%
Institution Totals		333	165	49.7%	35	8.3%
VX-##	= Virtual Job Groups					

[See Appendix B, Job Group Analysis, on file in the Office of Human Resources, for a statement of the number and percentage of minority and women incumbents, as described in 41 CFR 60-2.13, including a breakdown of total minority data by individual race and ethnicity.]

Availability Analysis [41 CFR 60-2.14]

– *Estimating Labor Market Availability*

Availability is ***an estimate of the number of qualified women and minorities available for employment*** in a given job group, expressed as a percentage of all qualified persons available for employment. Commonly referred to as availability or labor market analysis, the purpose of this step in AA planning is ***to form a valid basis for comparison*** to determine whether the representation of women and minorities within the University reflects the diversity of the labor markets in which we recruit. The University must consider the following two factors in determining the availability of women and minorities, on a job group by job group basis, but remains at liberty to assign appropriate weights to each factor.

- The percentage of women or minorities with the requisite skill in the reasonable recruitment area.
- The percentage of women or minorities among those promotable, transferable, and trainable within the University.

Comments on Factor 1: Availability in Reasonable Recruitment Areas

The reasonable recruitment area is determined by where the university recruits candidates for each job group. For executive-level managers (Job Group 11) and tenure track academic faculty (Job Groups 20-29), the University recruits nationally – so the reasonable recruitment area is based on national labor market data. For all other employees – including mid-level managers, professional, technical/paraprofessional, office/clerical, skilled crafts, and service maintenance employees (Job Groups 12 and 30-70) – the University recruits locally or within the State of South Dakota – so the reasonable recruitment area is the South Dakota state-wide labor market.

Once the recruitment area is determined for each job group (as above), it is necessary to identify data sources that are appropriate and representative of the job group among actual labor market areas in which the university recruits to determine the availability of women and minorities in the relevant labor market. BHSU has identified three distinct, national data sets that it believes are the most reliable and representative of its the various job groups, as indicated below.

- Executive-Level Managers (Job Group 11) consists exclusively of the president and vice presidents – who are recruited nationally among the higher education labor market. For this job group, BHSU utilizes availability data from the *Administrative Compensation Survey for Senior Executives & Chief Functional Officers* published annually by the College & University Professional Association for Human Resources (CUPA-HR), 2014 Edition.
- Faculty (Job Groups 20-29) are recruited nationally among the higher education labor market and are recruited directly out of Ph.D. graduate degree programs. Reflecting the dual sources for new faculty, it is appropriate to develop a custom data set that encompasses faculty presently at work among degree-granting, post-secondary institutions as well as individuals who are entering the academic labor market directly from graduate degree programs.

Consequently, for all faculty job groups, BHSU utilizes a 50/50 simple average of the following data sources, published by the Federal government:

- Digest of Education Statistics (DES), 2013 Edition, Table 315.80: Full-time faculty in degree-granting post-secondary institutions by race/ethnicity, sex, and program area, as of Fall 2003.
- Survey of Earned Doctorates (SED), 2014 Edition: Doctorate recipients by sex (Table 14) and race/ethnicity (Table 23) and broad field of study, Selected Years 2004 – 2014.

Table 315.80 of the Digest of Education Statistics was based on original survey data collected every five years by the U.S. Department of education from 1993 through 2003. This data has not been refreshed since 2003, but has been included in subsequent editions of the DES in 2008 and 2013, suggesting that the US DoE continues to have confidence in its relevance for the assessment of faculty employment patterns by race ethnicity and sex. It reflects all full-time faculty at work as of Fall 2003; while SEDs data reflects all individuals entering the professorate from 2004 through 2014. Taken together (with a simple 50/50 average), these two data sets demonstrably represent the availability of women and minorities in the higher education sector.

- For Mid-Level Manages (Job Group 12) and all staff job groups – including professional, technical/paraprofessional, office/clerical, skilled craft, and service maintenance (Job Groups 30-70) – employees are recruited locally or within the State of South Dakota. For these job groups, BHSU relies on census data for the State of South Dakota published by the U.S. Census Bureau every 10 years. 2010 census data are used in this report.

The University matches each job title within the job group to a detailed census occupation code. Using PeopleFluent AA planning software, we then extract labor market availability from the U.S. Census for the State of South Dakota. Availability percentages for women and minorities for each job group are then calculated by weighting the availability for each job title within the job group (in relation to the proportion of incumbents within the job group) to determine the final availability of women and minorities for each job group.

Note: It is important to keep in mind that labor market availability data are refreshed on an irregular basis. For this reason, availability data (and resulting utilization data) may show variations from year to year based on new market data (as data sets are refreshed). Such variations are statistical in nature and do not reflect substantive changes in the relative utilization of women and minorities among the University's workforce.

Comments on Factor 2: Availability within the Institution

Some job groups rely more heavily than others on internal promotions, transfers, or career progression. However, most job groups are characterized by open and competitive recruitment in which internal candidates are evaluated on an equal footing with external candidates. This openness helps BHSU attract the best qualified candidates both in the national labor market as well as the South Dakota labor market.

Even where viable internal candidates exist, weighting availability by the percent of women or minorities who may be in so-called “feeder job groups” within the institution can seriously skew availability data and distract from the overall goal of the university’s workforce reflecting the diversity of the labor market.

- For example, if women or minorities are materially under-represented in a feeder job group (such as Technicians), then including demographic data from the feeder job group in availability data for the receiving job group (such as Professionals) will understate the availability of women and minorities in the labor market where the university could recruit by opening vacancies to direct recruitment (in which employees in the so-called feeder job group are subsumed in labor market data). In such an instance, including feeder job group data separately in the availability of the receiving job group can understate under-utilization in the receiving job group.
- Conversely, if an institution has been effective in recruiting women and minorities in the feeder job group (such as Assistant Professors) where women and minorities are represented to a larger extent among entry level jobs than in the job group as a whole, exceeding labor market availability, then including demographic data from the feeder job group in availability data for the receiving job group (such as Associate or Full Professors) may overstate the availability of women and minorities in the labor market for the receiving job group. As a result, including feeder job group data in the availability of the receiving job group can create an artificially high benchmark for the receiving job group which the institution is structurally unable to achieve – and potentially overstating under-utilization in the receiving job group.

For these reasons, availability factors for all job groups are weighted 100% for reasonable recruitment area (based on actual labor market data) and 0% for internal promotions or transfers. The following chart shows the estimated availability of women and minorities by job group for Black Hills State University, based on the data sources and aggregation methods described in this section of this report.

Job Group	Labor Market Availability for Women & Minorities	Avail Pct Women	Avail Pct Minority
VX-10	Executives	46.3%	8.9%
11	• Executive-Level Mgrs	34.4%	10.6%
12	• Mid-Level Mgrs	47.9%	8.7%
VX-20	VX-Total Faculty	47.0%	21.5%
VX-21	VX-Liberal Arts Faculty	47.3%	19.3%
22	• Arts & Humanities Faculty	47.9%	18.0%
23	• Math & Soc Sci Faculty	46.2%	21.8%
VX-24	VX-Bus & Nat Sci Faculty	42.5%	43.3%
25	• Business Faculty	40.1%	23.8%
26	• Natural Sci Faculty	45.5%	22.7%
VX-27	VX-Education & Beh Sci Faculty	51.3%	22.2%

28	• Education Faculty	56.9%	23.3%
29	• Behavioral Sci Faculty	45.1%	21.0%
30	Technicians/Paraprofessionals	25.7%	15.7%
40	Professionals	54.5%	12.7%
50	Office/Clerical	79.7%	7.6%
60	Skilled Crafts	12.0%	10.6%
70	Service/Maintenance	38.0%	19.6%
VX-##	= Virtual Job Groups		

[See Appendix C, Availability Analysis & Availability Data for Executive Officers and Faculty, together with source data and methodology notes, on file in the Office of Human Resources.]

Utilization Analysis [41 CFR 60-2.15]

– Comparing Incumbency to Estimated Availability

After determining work force percentages and availability percentages, the next step in the AA planning process, commonly referred to as utilization analysis, is ***to compare the work force percentages to estimated availability percentages to determine whether women and minorities at BHSU are represented in proportion to their availability in the labor market.*** Under-utilization of women or minorities exists in a job group when the percentage of employees is less than the percentage that would reasonably be expected by their availability.

In addition to comparing the percentage of women and minorities in the workforce to the availability of women and minorities in the labor market, the utilization charts generated by PeopleFluent AA planning software show the actual number of women and minorities that would reasonably be expected in the workforce, if the workforce looked just like the labor market. This helps academic decision makers scale the representation of women and minorities by knowing how many employees the university would need to hire in relation to the composition of the current work force to bring the representation of women or minorities in the work force into parity with the labor market, job group by job group.

The two charts that follow show the number and percentage of women and minorities, respectively, within the BHSU workforce compared to the estimated availability of women and minorities in the workforce based on the reasonable recruitment area for each job group. The charts then calculate the number of women or minorities that would reasonably be expected if the percentage of women and minorities within the workforce reflected the workforce availability percentages precisely. Finally, the charts calculate the number of whole employees by which women or minorities at BHSU are above or below labor market parity. For those job groups where the number of women or minorities is below labor market availability, the chart flags the job group if the representation of women or minorities at BHSU is greater than or equal to two standard deviations below market availability.

Incumbency v. Estimated Availability for Women

Job Group	Incumbency v. Estimated Availability for Women	Total Employees	BHSU Number Women	BHSU Percent Women	Available Percent Women	Expected Number Women	Over (Under) Market	≥ 2 Std Dev
VX-10	Executives	50	24	48.00%	46.3%	23	1	
11	• Executive-Level Mgrs	6	3	50.00%	34.4%	2	1	
12	• Mid-Level Mgrs	44	21	47.73%	47.9%	21	-	
VX-20	VX-Total Faculty	126	52	41.27%	47.0%	59	(7)	Yes
VX-21	VX-Liberal Arts Faculty	43	13	30.23%	47.3%	20	(7)	Yes
22	• Arts & Humanities Faculty	27	9	33.33%	47.9%	13	(4)	Yes
23	• Math & Soc Sci Faculty	16	4	25.00%	46.2%	7	(3)	Yes
VX-24	VX-Bus & Nat Sci Faculty	50	19	38.00%	42.5%	21	(2)	
25	• Business Faculty	32	13	40.63%	40.1%	13	-	
26	• Natural Sci Faculty	18	6	33.33%	45.5%	8	(2)	
VX-27	VX-Education & Beh Sci Faculty	33	20	60.61%	51.3%	17	3	
28	• Education Faculty	15	11	73.33%	56.9%	9	2	
29	• Behavioral Sci Faculty	18	9	50.00%	45.1%	8	1	
30	Technicians/Paraprofessionals	13	4	30.77%	25.7%	3	1	
40	Professionals	75	47	62.67%	54.5%	41	6	
50	Office/Clerical	21	21	100.00%	79.7%	17	4	
60	Skilled Crafts	7	2	28.57%	12.0%	1	1	
70	Service/Maintenance	41	15	36.59%	38.0%	16	(1)	
Institution Totals		333	165	49.69%	NA	NA	NA	

Shaded cells represent Job Groups where BHSU representation of women is ≥ 2.0 Std Dev below availability.

Incumbency v. Estimated Availability for Minorities

Job Group	Incumbency v. Estimated Availability for Minorities	Total Employees	BHSU Number Minority	BHSU Percent Minority	Available Percent Minority	Expected Number Minority	Over (Under) Market	≥ 2 Std Dev
VX-10	Executives	50	2	4.00%	8.9%	4	(2)	
11	• Executive-Level Mgrs	6	0	0.00%	10.6%	1	(1)	
12	• Mid-Level Mgrs	44	2	4.55%	8.7%	4	(2)	
VX-20	VX-Total Faculty	126	16	12.70%	21.5%	27	(11)	Yes
VX-21	VX-Liberal Arts Faculty	43	3	6.98%	19.3%	8	(5)	Yes
22	• Arts & Humanities Faculty	27	1	3.70%	18.0%	5	(4)	Yes
23	• Math & Soc Sci Faculty	16	2	12.50%	21.8%	3	1	
VX-24	VX-Bus & Nat Sci Faculty	50	11	22.00%	23.3%	12	(1)	
25	• Business Faculty	32	9	28.13%	23.8%	8	1	
26	• Natural Sci Faculty	18	2	11.11%	22.7%	4	(2)	
VX-27	VX-Education & Beh Sci Faculty	33	2	6.06%	22.2%	7	(5)	Yes
28	• Education Faculty	15	0	0.00%	23.3%	3	(3)	Yes
29	• Behavioral Sci Faculty	18	2	11.11%	21.0%	4	(2)	
30	Technicians/Paraprofessionals	13	1	7.69%	14.6%	2	(1)	
40	Professionals	75	9	12.00%	12.7%	10	(1)	
50	Office/Clerical	21	2	9.52%	7.6%	2	-	
60	Skilled Crafts	7	0	0.0%	10.6%	1	(1)	
70	Service/Maintenance	41	5	12.20%	19.6%	8	(3)	Yes
Institution Totals		333	35	8.30%	NA	NA	NA	

Shaded cells represent Job Groups where BHSU representation of minorities is ≥ 2.0 Std Dev below availability.

[See Appendix D, Incumbency v. Estimated Availability, on file in the Office of Human Resources, for availability calculations that include a breakdown of total minority data by individual race and ethnicity.]

Annual Placement Goals [41 CFR 60-2.16]

OFCCP guidelines require the university to establish annual placement goals wherever the work force percentage for women or minorities is materially less than the availability percentage for each job group and where the percentage difference is deemed to be statistically significant. Placement goals serve as objectives or targets for our subsequent recruitment processes that should be reasonably attainable by means of applying every good faith effort to reach out to qualified women and minority candidates in the labor market.

In recent years, the OFCCP has moved entirely away from numeric goals, requiring only that placement goals be at least equivalent to the availability percentages for those job groups in which women or minorities are under-represented in relation to labor market availability and the degree of under-representation is deemed to be statistically significant. This emphasis on percentage goals reflects the repudiation of quotas or set-asides commonly adopted in the early years of affirmative action planning as a means of increasing the representation of women and minorities in the work force, but whose literal application resulted in some instances of reverse discrimination against non-minority or male applicants.

The OFCCP specifically cautions that placement goals may not be rigid and inflexible quotas (which are expressly forbidden); may not be considered as either a ceiling or a floor; may not create set-asides for specific groups; and may not be used to “supersede merit selection principles.” Current OFCCP guidelines, thus, emphasize that ***all affirmative action efforts must occur under the over-arching umbrella of equal opportunity***, with consideration for every candidate, regardless of personal demographics, noting in particular that, “In all employment decisions, the (employer) must make selections in a nondiscriminatory manner.”

As described in more detail in subsequent sections of this report, Black Hills State University has adopted a threshold of two standard deviations to determine that the under-representation of women or minorities is deemed to be statistically significant. As documented in the Incumbency v. Estimated Availability charts for women and minorities in the preceding section, the University has adopted placement goals for job groups where the representation of women or minorities is below market availability and the difference rises to the level of two standard deviations below market availability. Accordingly, the University hereby adopts the following placement goals for 2016-2017.

Placement Goals for Women

None applicable.

Note: Annual placement goals are assigned to natural job groups, where recruitment activity occurs. They are not assigned to virtual job groups, which simply different organizational views of the same employee population.

Placement Goals for Minorities

- | | |
|-----------------------------|--------------------|
| ▪ Arts & Humanities Faculty | 18.0% of New Hires |
| ▪ Natural Sciences Faculty | 22.7% of New Hires |
| ▪ Education Faculty | 23.3% of New Hires |

[See Appendix E, Annual Placement Goals, on file in the Office of Human Resources, for an organizational profile prepared according to 41 CFR 60-2.16, including a breakdown of total minority data by individual race and ethnicity.]

Comments regarding Transaction vs. Outcome Measures

The OFCCP's percentage placement goals will be recognized as ***transaction measures***. By requiring that the placement of women or minorities in job groups where they are currently under-utilized at least match their availability in the labor market, the placement goal essentially represents race or sex neutral recruitment. If women and minorities are recruited at least in proportion to their labor market availability, it would be a fair observation that our current recruitment processes were non-discriminatory with respect to race or sex.

While the OFCCP disclaims that placement goals are intended to achieve proportional representation or equal results [§60-2.16(e) (3)], the OFCCP does affirm that "A central premise underlying affirmative action is that, absent discrimination, over time, a contractor's work force, generally, will reflect the gender, racial, and ethnic profile of the labor pools from which the contractor recruits and selects." [§60-2.10(a) (1)] This affirmation is consistent with the stated objective of the University's EEO/AA Program for our ***work force to look just like the labor market*** – that is, for the representation of women and minorities at BHSU to reflect their labor market availability, job group by job group.

Identification of Problem Areas [41 CFR 60-2.17(b)]

While a preceding section of this report details the representation of women and minorities at BHSU in relation to labor market availability, this section is intended to note major findings with respect to areas of concern.

Observations regarding Standard of Reasonableness

When evaluating the representation of women and minorities within the University in relation to labor market availability, it is important to adopt a standard of reasonableness – since OFCCP guidelines require the adoption of specific hiring goals and good faith efforts to recruit women and minorities when their representation within the university is "less than reasonably expected" based on labor market availability. OFCCP guidelines afford the University broad discretion to select among one of three standards of reasonableness – the "any difference test," the "80/20 test", or a "two-standard deviations test."

The any difference test defines under-utilization anytime the percentage of women and minorities is not exactly equal to labor market availability (and where the difference is at least one full person). This test is unduly sensitive to normal labor market variation, particularly among executives and faculty who are typically subject to an annual recruitment cycle.

The 80/20 Test is similar to the EEOC's historical preliminary review of recruitment patterns; that is, if the recruitment of women or minorities is at least 80% of the recruitment pattern for men or non-minorities, the institution's recruitment practices are deemed to be non-discriminatory. The 80/20 test is an "observational" test and does not reflect sufficient intellectual rigor to infer cause and effect, so is sub-optimal in determining that the under-utilization of women or minorities in relation to availability is a function of discrimination.

The Two Standard Deviations Test provides the necessary intellectual rigor to infer that recruitment outcomes are not simply random or coincidental and warrant substantive review by the institution. For this reason, Black Hills State University adopts the Two Standard Deviations Test for its affirmative action planning and commits to undertaking specific affirmative action efforts – including the adoption of recruitment goals – wherever this test reveals that women or minorities are represented within the University "less than reasonably expected" in relation to labor market availability.

Observations regarding the Utilization of Women

Black Hills State University has organized its workforce into 13 natural job groups, among seven EEO-6 occupational categories. In two occupational categories, the University has identified five additional "virtual" job groups (consisting of the arithmetic amalgamation of subordinate natural job groups) so as to provide academic administrators with multiple "views" of the institution. For example, the Executive job group (VX-10) is a virtual job group that represents the amalgamation of two natural job groups, Executive-Level Managers (11) and Mid-Level Managers (12). Similarly, Total Faculty (VX-20) is a consolidation of the three colleges (VX-21, 24, & 27) which are in turn consolidations of each of the two schools housed within each college.

As illustrated in the chart on page 10 women are represented at or above labor market availability in 10 out of 13 natural job groups and are below market availability in three natural job groups. While directors, deans, and academic administrators may reasonably undertake affirmative outreach efforts anytime women are represented below market availability, it is notable that among the job groups where women are represented below market availability, none of these variations is statistically significant at the level of two standard deviations. Consequently, ***none of the job groups at BHSU are deemed to be under-utilized for women.***

Utilization of Minorities

As illustrated in the chart on page 11, minorities are represented at or above labor market availability in five out of 13 natural job groups and are below market availability in eight natural job groups. Among those job groups where minorities are represented below labor market availability, this variation is statistically significant to the level of two standard deviations among

only three job groups. For this reason, ***the following job groups at BHSU are deemed to be under-utilized for minorities:***

- Job Group 22 – Arts & Humanities Faculty
- Job Group 26 – Natural Science Faculty
- Job Group 28 – Education Faculty

Each of these faculty job groups comprises one of two schools in each of the three colleges. It is of interest, however, that under-representation of minorities in one school within a college may be offset or ameliorated in part by the representation of minorities at or above market availability in another school within the same college. The following observations are offered for consideration of College Deans and the Provost, respectively:

- In the College of Liberal Arts, the statistically significant under-representation of minorities in the School of Arts & Humanities is moderated by the fact that minorities among faculty in the School of Mathematics & Social Sciences are represented slightly above market availability. As a result, the aggregate representation of minorities in the College of Liberal Arts – while still somewhat below market availability – is not deemed to be statistically significant.
- In similar fashion, in the College of Business and Natural Sciences, the statistically significant under-representation of minorities in the School of Natural Sciences is moderated by the fact that minorities among faculty in the School of Business are represented slightly above market availability. As a result, the aggregate representation of minorities in the College of Business and Natural Sciences – while still somewhat below market availability – is not deemed to be statistically significant.
- In the College of Education and Behavioral Sciences, the statistically significant under-representation of minorities in the School of Education is exacerbated by moderate under-representation of minorities in the School of Behavioral Sciences (even though the under-representation of minorities in the School of Behavioral Sciences, on its own, is not deemed to be statistically significant). As a result, over-all under-representation of minorities among the College of Education and Behavioral Sciences is deemed to be statistically significant.
- Among total faculty, the cumulative under-representation of minorities among the professorate – while moderate in some instances and above market availability in some instances – fails to reasonably reflect the availability of minorities in the national higher education labor market at a level which is deemed to be statistically significant.

A final observation with respect to the representation of minorities among the professorate at Black Hills State University relates to the “aspirational” nature of benchmarking BHSU faculty to the national academic labor market. While metropolitan research universities and national universities typically have the institutional recognition, urban setting, and financial wherewithal to recruit faculty on a national scale, regional universities such as Black Hills State University often

must rely on regional recruitment efforts, despite a commitment to open and competitive national recruitment. As a consequence, the racial and ethnic profile of BHSU faculty may reflect the racial and ethnic profile of the upper mid-West, which is demonstrably less diverse than more heavily populated, urban sectors of the country where educational institutions are concentrated.

This observation is not intended to distract from the under-representation of minorities in certain segments of the BHSU professorate, but may add an element of perspective that will assist academic administrators in defining recruitment strategies that would address the under-utilization of minorities among faculty. As for the three job groups for which minorities are deemed to be under-utilized to a significant degree, this EEO/AA plan commits the university to establish good faith hiring goals and to identify affirmative efforts to identify strategies that will enhance the likelihood of attracting qualified minorities to BHSU in future recruitment efforts.

Academic Deans, School Directors, and Search Committees should continue to give particular attention to recruitment and outreach strategies that target women and minorities in disciplines, in which women or minorities are represented below market availability – with particular attention to those three job groups where minorities are deemed to be under-utilized at a level which is statistically significant.

Observations regarding representation among “Total Minorities” v. representation by “Individual Race/Ethnicity”

OFCCP guidelines provide that the University’s EEO/AA plan document the percentage of “total minorities” within the University’s workforce and in relation to labor market availability. Total minorities includes individuals who self-disclose race or ethnicity in the following categories:

Ethnicity

- Hispanic, regardless of race.

Race

- American Indian or Alaskan Native
- Asian
- Black or African American
- Native Hawaiian or Other Pacific Islander (combined with Asian prior to 2010 Census)
- Two or more Races

Where under-utilization exists for total minorities in a job group, the recruitment of any minority will moderate total under-utilization. It is notable, however, that the US Census Bureau and US Department of Education collect individual race/ethnicity in labor market surveys and it is legitimate to emphasize outreach to particular race/ethnic populations in many circumstances. PeopleFluent affirmative action planning software calculates estimated labor market availability by individual race/ethnicity as well as by total minority representation.

To the extent that it may be of interest to BHSU administrators, among faculty job groups that reflect the under-utilization of minorities, Blacks/African Americans are under-utilized to a level that is statistically significant in the virtual job groups for “Total Faculty” and the “College of Education and Behavioral Sciences” – even though they are not under-utilized in the natural job groups that comprise these virtual job groups. Among staff job groups, American Indians are under-utilized to a level that is statistically significant in the Service/Maintenance job group (70), even though total minorities are not deemed to be under-utilized in this job group. No other individual race or ethnic group reflects under-utilization at a statistically significant level.

ADDITIONAL REQUIRED EEO/AA PROGRAM ELEMENTS [41 CFR 60-2.17]

This section of the University’s EEO/AA Plan describes additional required elements of AA Programs, as specified at 41 CFR 60-2.17, which include: (a) ***designation of responsibility***, (b) ***identification of problem areas***, (c) ***action oriented-programs and other “good faith efforts,”*** and (d) ***internal audit and reporting system***.

Designation of Responsibility [41 CFR 60-2.17(a)]

The University President has assigned institution-wide responsibility to the Director of Human Resources for implementation of the University’s equal employment opportunity and affirmative action program under 41 CFR 60 for all faculty, professional, and classified staff employees. In discharging the functions of the institutional EEO/AA Officer, the Director of Human Resources has direct access to all senior officers, as necessary, to ensure effective program implementation.

The Office of Human Resources is charged with responsibility for ensuring compliance with equal employment opportunity and affirmative action program policies related to recruitment and compensation programs. With respect to the investigation of harassment or sexual misconduct complaints, the Director of Human Resources coordinates directly with the Assistant to the Vice President for Student Affairs who serves as the University’s Title IX Coordinator.

Identification of Problem Areas [41 CFR 60-2.17(b)]

The principle strategy for identifying problem areas is included in the University’s annual analysis of workforce percentages and availability percentages for the entire employee population – and the identification of job groups in which women or minorities are under- represented at BHSU in relation to labor market availability.

As an inaugural EEO/AA plan using new EEO/AA planning software, it is not possible to “look back” at hiring patterns by job group over the past year; however, it is notable that PeopleFluent AA planning software provides the capacity to compare the recruitment of women and minorities on a percentage basis in relation to their representation among recruitment pools over time and to determine whether women and minorities are recruited in proportion to their representation in applicant pools. Such analysis will be included in future EEO/AA plans.

Action-Oriented Programs [41 CFR 60-2.17(c)]

OFCCP guidelines require that the university develop and execute action-oriented programs designed to correct problem areas and to attain established goals and objectives. Action-oriented programs may include substantive review of personnel policies or procedures which have previously produced inadequate results or consist of good faith efforts to remove identified barriers, expand employment opportunities, and produce measurable results.

All executive level officers – including vice presidents, deans, and school and department directors – are responsible for fostering and sustaining an environment of inclusiveness that empowers all to achieve their highest potential without fear of prejudice or bias. Black Hills State University is committed to building an exemplary educational community that offers a nurturing and challenging intellectual climate, a respect for the spectrum of human diversity, and a genuine understanding of the many differences-including race, ethnicity, gender, gender identity, sexual orientation, age, socioeconomic status, disability, religion, national origin or military status that enrich a vibrant university community.

Examples of Action-Oriented Employment Programs include:

- All faculty vacancies are advertised on HigherEdJobs.com to ensure national reach and exposure of all recruitment efforts. Individual faculty vacancies may also be advertised in discipline-specific academic journals as determined by School Directors or Deans.
- BHSU partners with the South Dakota Board of Regents, the South Dakota Department of Labor, and South Dakota Workforce Initiatives to ensure the broadest public dissemination of all staff vacancies.

Examples of Action-Oriented Academic Programs include:

- Black Hills State University supports and maintains the “Center for American Indian Studies” within the College of Liberal Arts. Dr. Urla Marcus, director of the Center for American Indian Studies, recently served as the National Chair-Elect for the Indigenous Peoples Knowledge Community.
- Black Hills State University provides a “Certificate in Diversity” within the Social Sciences program. The certificate program is designed to help prepare students specifically for working in multicultural environments.
- The University’s over-all curriculum includes a number of courses (specific to various academic areas of interest) that focus on aspects of diversity and which challenge students to understand the role diversity plays in business, social, educational, and personal communities, particularly in the areas of humanities, business, education, and behavioral sciences in addition to social sciences.

Examples of Action-Oriented Student Programs include:

- International Food Festival is a week-long festival hosted by the Office of International Relations and Global Engagement each spring in collaboration with Student Dining Services that highlights culture, costume, and food traditions from across the world.
- The International Student Organization at BHSU serves as a cultural exchange and establishes links between international and domestic students to give an understanding of different cultures to the BHSU campus and community.

Internal Audit and Reporting System [41 CFR 60-2.17(d)]

OFCCP guidelines require the University to develop and implement an auditing system that periodically measures the effectiveness of its total affirmative action program, including the specific components addressed in this section.

1. ***Monitoring records of all personnel activity.*** The Director of Human Resources is responsible for preparing an annual statistical analysis of workforce and labor market availability that undergirds the preparation of the University's EEO/AA Plan, as well as preparing adverse impact analyses used to identify potential problem areas including new hires, transfers & promotions, position reclassifications, involuntary separations, and appointment with tenure.
2. ***Requiring internal reporting on a scheduled basis.*** All EEO/AA related reports and assessment activities noted above are conducted at least annually on a fiscal year / academic year basis, culminating in the publication of the University's EEO/AA Plan.

The Director of Human Resources, serving as the University's EEO/AA Officer, is responsible for ensuring that Human Resources undertakes the annual assessment of personnel activity (above) and that division, college, and school level annual reports, planning, and assessment processes include an assessment of equal opportunity issues pertaining to employment.

3. ***Reviewing report results with all levels of management.*** The Director of Human Resources has immediate access to and will brief vice presidents and academic deans on report results. In addition, copies of the University's annual EEO/AA Plan are posted to the university's website for ready access by all university community members.
4. ***Advising senior officers on program effectiveness and recommending program improvements.*** The Director of Human Resources advises senior officers on program effectiveness and recommends program improvements for their respective areas of responsibility.

OBLIGATIONS REGARDING SPECIAL DISABLED VETERANS, VETERANS WITH QUALIFYING SERVICE, RECENTLY SEPARATED VETERANS, AND INDIVIDUALS WITH DISABILITIES

[41 CFR 60-250 and 41 CFR 60-741]

In accordance with the provisions of 41 CFR 60-250 and 41 CFR 60-741, Black Hills State University affirms that the obligations and commitments reflected in the University's EEO/AA Program shall be inclusive of and expressly apply to Special Disabled Veterans, Veterans with Qualifying Service, Recently Separated Veterans, and Individuals with Disabilities.

Black Hills State University will not discriminate because of an individual's status as a special disabled veteran, veteran with qualifying service, recently separated veteran, or individual with a disability and will take affirmative action to employ and advance in employment qualified special disabled veterans, veterans with qualifying service, recently separated veterans, and individuals with disabilities at all levels of employment, including the executive level.

With respect to physical and mental qualifications for employment, Black Hills State University expressly affirms that:

- The University will establish and adhere to a schedule for the periodic review of all physical and mental job qualifications to ensure job-relatedness for the position;
- Special disabled veterans and individuals with disabilities shall be afforded an opportunity to complete for vacant positions for which they are qualified either with or without accommodation (without disclosing in advance of selection if accommodations could be required for successful job performance);
- Once selected for a position, special disabled veterans and individuals with disabilities may request accommodation that would enable their successful job performance;
- The University shall provide all reasonable accommodations requested by special disabled veterans and individuals with disabilities to enable their successful job performance, without prejudice to the special disabled veteran or individual with a disability of any kind whatsoever.
- All terms and conditions of employment – including selection, promotion, compensation, benefits, professional development, opportunity for career progression, and participation in university activities – for special disabled veterans, veterans with qualifying service, recently separated veterans, and individuals with a disability shall be identical in scope and nature to the terms and conditions of employment for all other employees; provided, however, that veterans shall be extended preference in initial employment with Black Hills State University among substantially equally qualified candidates.

Incumbency v. National Goal for Veterans

Job Group	Incumbency v. National Goal for Veterans	Total Employees	BHSU Number Veterans	BHSU Percent Veterans	National Benchmark Veterans	Expected Number Veterans	Over (Under) Market	≥ 2 Std Dev
VX-10	Executives	50	4	8.0%	7.0%	4	-	
11	• Executive-Level Mgrs	6	0	0.0%	7.0%	1	(1)	
12	• Mid-Level Mgrs	44	4	9.09%	7.0%	3	1	
VX-20	VX-Total Faculty	126	9	7.14%	7.0%	9	-	
VX-21	VX-Liberal Arts Faculty	43	4	9.3%	7.0%	3	1	
22	• Arts & Humanities Faculty	27	3	11.11%	7.0%	2	1	
23	• Math & Soc Sci Faculty	16	1	6.25%	7.0%	1	-	
VX-24	VX-Bus & Nat Sci Faculty	50	0	0.0%	7.0%	4	(4)	Yes
25	• Business Faculty	32	0	0.0%	7.0%	2	(2)	
26	• Natural Sci Faculty	18	0	0.0%	7.0%	1	(1)	
VX-27	VX-Educ & Beh Sci Faculty	33	5	15.15%	7.0%	2	3	
28	• Education Faculty	15	4	26.66%	7.0%	1	3	
29	• Behavioral Sci Faculty	18	1	5.55%	7.0%	1	-	
30	Technicians/Paraprofessionals	13	0	0.0%	7.0%	1	(1)	
40	Professionals	75	5	6.66%	7.0%	5	-	
50	Office/Clerical	21	0	0.0%	7.0%	1	(1)	
60	Skilled Crafts	7	0	0.0%	7.0%	1	(1)	
70	Service/Maintenance	41	4	9.76%	7.0%	3	1	
Institution Totals		333	26	7.81%	7.0%	23	3	

Shaded cells represent Job Groups where BHSU representation of veterans is ≥ 2.0 Std Dev below goal.

Incumbency v. National Goal for Individuals with a Disability

Job Group	Incumbency v. National Goal for Individuals with a Disability	Total Employees	BHSU Number Disabled	BHSU Percent Disabled	National Benchmark Disabled	Expected Number Disabled	Over (Under) Market	≥ 2 Std Dev
VX-10	Executives	50	4	8.0%	7.0%	4	-	
11	• Executive-Level Mgrs	6	0	0.0%	7.0%	1	(1)	
12	• Mid-Level Mgrs	44	4	9.09%	7.0%	3	1	
VX-20	VX-Total Faculty	126	5	3.97%	7.0%	9	(4)	Yes
VX-21	VX-Liberal Arts Faculty	43	3	6.98%	7.0%	3	-	
22	• Arts & Humanities Faculty	27	2	7.41%	7.0%	2	-	
23	• Math & Soc Sci Faculty	16	1	6.25%	7.0%	1	-	
VX-24	VX-Bus & Nat Sci Faculty	50	0	0.0%	7.0%	4	(4)	Yes
25	• Business Faculty	32	0	0.0%	7.0%	2	(2)	
26	• Natural Sci Faculty	18	0	0.0%	7.0%	1	(1)	
VX-27	VX-Educ & Beh Sci Faculty	33	2	6.06%	7.0%	2	-	
28	• Education Faculty	15	2	13.33%	7.0%	1	1	
29	• Behavioral Sci Faculty	18	0	0.0%	7.0%	1	(1)	
30	Technicians/Paraprofessionals	13	0	0.0%	7.0%	1	(1)	
40	Professionals	75	1	1.33%	7.0%	5	(4)	Yes
50	Office/Clerical	21	0	0.0%	7.0%	1	(1)	
60	Skilled Crafts	7	0	0.0%	7.0%	1	(1)	
70	Service/Maintenance	41	6	14.63%	7.0%	3	3	
Institution Totals		333	16	4.80%	7.0%	23	(7)	Yes

Shaded cells represent Job Groups where BHSU representation of disabled persons is ≥ 2.0 Std Dev below goal.

Observations regarding the Representation of Veterans and Individuals with a Disability

Recent changes to OFCCP guidelines require Federal Contractors to compare the percentage of employees who disclose veteran status or disability status with national benchmarks of the proportion of the total civilian, working-age population with veteran status or disability status. PeopleFluent affirmative action software calculates the expected number of veterans or individuals with a disability by job group and estimates the number of additional veterans or disabled persons that the University would need to recruit to achieve the national benchmark value, similar to the calculations for the representation of women and minorities.

As the chart on page 21 illustrates, BHSU has 23 employees who have disclosed veteran status in relation to a total employment population of 379 – representing 6.1% of the total workforce in relation to a national benchmark of 7.0%. The percentage variation is not deemed to be statistically significant, except among “Total Faculty.” It is notable that Black Hills State University – together with all SD Board of Regents institutions – provides an express preference in hiring to special disabled veterans, veterans with qualifying service, and recently separated veterans among substantially equally qualified candidates.

As the chart on page 22 illustrates, BHSU has 19 employees who have disclosed a disability in relation to a total employment population of 379 – representing 5.0% of the total workforce in relation to a national benchmark of 7.0%. None of the percentage variations among individual job groups are deemed to be statistically significant.

[See Appendix F, Veterans & Disability Benchmark Reports, on file in the Office of Human Resources, for an assessment of incumbency v. national benchmarks for veterans and individuals with disabilities, prepared according to 41 CFR 60-250 741, respectively.]

Dissemination of EEO/AA Plan

To promote awareness of our EEO/AA Program, the Office of Marketing and Communications is responsible for distributing a copy of the University’s annual ***Reaffirmation of Commitment to Equal Employment and Educational Opportunity*** to all faculty, staff, and students. The Director of Human Resources is responsible for providing copies of this report to all Executive officers and presenting an overview of the ***EEO/AA Program*** to University constituency groups.

Conclusion

Black Hills State University reaffirms its commitment to equality of educational and employment opportunity in its relationships with all members of the university community and its commitment to the elimination of any documented historical and continuing under-utilization of women and minorities among the student body or employee complement. Black Hills State University is committed to this program and is aware that with its implementation, positive benefits will be received from the greater utilization and development of previously underutilized human resources.