ESTABLISHMENT OF GOALS

[41 CFR 60-2.12 and 2.13(e)]
Effective: January 1, 2009

In establishing the affirmative action goals for the current program year, the following steps were performed:

1. Job Group Analysis
   o   Job categories for the University's full-time permanent employees were determined.
2. Availability Analysis
   o   Availability data concerning personnel pools for positions in the University's job categories were analyzed.
3. Comparison of Incumbency to Availability and Goal Setting
   o   Ratios of minorities and women in the University's present work force were compared with ratios of minorities and women in the available pools. Those ratios were analyzed for statistical significance to determine whether females and/or minorities are represented by less than would reasonably be expected. Placement goals were set where females or minorities were not represented as would be reasonable expected.

Job Group Analysis

In compliance with regulations [C.F.R. 60 2.12 (b)] of the Office of Federal Contract Compliance Programs (OFCCP), the oversight agency for Executive Order 11246, all the University's job titles (EHRA and SHRA) were reviewed and grouped on the basis of the following: (1) similar work content, (2) similar rates of pay and (3) similar opportunities. Data on the work force on September 30 of the most recent year were used. Each of the identified job groups has been assigned a three digit code. The job categories relate to subdivisions of the Occupational Activity (OA) Code Classification, which is the system used in the University's routine reports to the Office of Civil Rights.

A description of the job groups is included as Section A. The jobs are ranked from lowest to highest according to pay.

Availability Analysis

An availability analysis was performed to determine the availability of females and minorities for each job group. The Office of Federal Contract Compliance Programs has published regulations which require that the availability analysis be based on the following two factors:

Factor Description

1. The percentage of minorities and women with requisite skills in the reasonable recruting area. The reasonable recruiting area is defined as the geographical area from which the contractor usually seeks or reasonable could seek workers to fill the positions in question.
2. The percentage of minorities and females among those promotable, and transferable within the contractor's organization.

Availability of the employee pool based on these two factors was determined for each of the University's job groups. For Factor 1 information was gathered from the 2000, customized from six (6) North Carolina counties; Alamance, Davidson, Forsyth-Stokes, Guilford, Randolph, and Rockingham; from the state of North Carolina, and two (2) Virginia counties; Henry-Patrick/Martinsville and Pittsylvania/Danville; from the state of Virgina, and the United States. In addition, we reference the most current Survey of Earned

Doctorates (SED) about doctoral recipients in the United States. Each of the University's job titles within the identified job groups was analyzed with reference to the Alphabetical Index of Industries and Occupations, which is published by the United States Department of Commerce, Bureau of Census. A code (census code) was assigned to each job title which matches a number used in reports of the United States Census Office. These census codes appear in labor market reports for the counties listed above, North Carolina, and the United States. This code links the University's job titles within each job group to relevant information in the United States Census Report.

Availability in internal pools (Factor 2) was based largely on an analysis of feeder job groups and informal and formal training programs.

After availability was determined, values were then assigned to reflect the relative importance of the two factors. The exact value weights that apply to Job Groups for the purposes of determining current goals are explained in "Value Weights by Job Groups" which appears in Section B, The "Availability Analysis by Job Groups", Section C in that same appendix, demonstrates the effect of the value weights on raw availability data to produce relevant availability statistics.

Utilization and Goal Setting

"Underutilization" of minorities and women exists in a job group when the actual number of employees is less than the number that "would reasonably be expected by their availability" (OFCCP Revised Order No. 4, 41 CFR 60?2). "Utilization Analysis - Work Force v. Availability Percentages" (Appendix III) shows a comparison by job group of the University's work force by race and sex with the estimated availability of women and minorities for the positions within that job group.

As noted above, the OFCCP's definition of "underutilization" relies on a standard of reasonableness. Numerous interpretations of that standard have been introduced and utilized by business, industry, government, and educational institutions. The names of some of these are the "80 Percent Rule," "Two and Three Standard Deviation Rule," and the "Any Difference-Whole Person Rule."

The University's goals have been set by applying the most commonly used analysis, the "Two Standard Deviation Rule." In using this measure for determining underutilization you effectively deal with the imprecision associated with personnel data and work force shifts. The A Two Standard Deviation Rule" is based on the observation that if the employer pays no attention at all to race or sex in placing people in jobs, there would be some natural degree of departure from perfect parity, both above and below, and that only extreme departures below parity should be construed as evidence of possibly discriminatory practices. If the difference between actual utilization and the availability percentages results in two points from the mean, then the difference may be significant and a goal should be set. If the difference is three or more points from the mean, then the difference is certainly significant and a goal must be set.

The "Two Standard Deviation Rule" is useful in balancing the unavoidable uncertainty in an availability estimate. Much of the information in the "Availability Analysis" is based on the most recent census data, which may not be at all reliable at points well into the decade. It also takes into account the relatively few opportunities available for correction in a small job group.