

October 25, 1974

STATUS OF NCSU AFFIRMATIVE ACTION

The North Carolina State University Affirmative Action Plan is based on a three-year period from July 1, 1973 to June 30, 1976. The progress we have made in attaining our goals on race and sex is summarized below. The EPA non-faculty and faculty summaries are based on studies made this fall, while the SPA summaries are based on studies completed on July 1, 1974.

Race Personnel Summary

EPA Non-Faculty

The full-time black EPA non-faculty numerical goal by June 1976 is 39. At the present time we have 27 blacks in this category. There is no change over 1973-74. Under "other race" category (American Indians, American Orientals, Spanish Surnames) we have four (4) full-time persons with a 1976 goal of five (5).

EPA Faculty

The full-time black EPA faculty numerical goal by June 1976 is 44. At the present time we have 17 full-time black faculty members. This is an increase of three (3) over 1973-74. Under "other race" category, at present, we have 15 with a goal of 20 by 1976. There has been no change over 1973-74.

SPA

The overall full-time black SPA numerical goal is 636 by June 1976. On July 1, 1974, the number of blacks increased from 538 to 554. Twelve of the 16 additions came in the clerical area, one (1) black addition was in the officials and managers classification, and the three (3) other additions were in the laborer classification.

Sex Personnel Summary

EPA Non-Faculty

The full-time female EPA non-faculty numerical goal by June 1976 is 89. At the present time we have 88 in this category. This is an increase of four (4) over 1973-74.

EPA Faculty

The full-time female EPA faculty numerical goal by June 1976 is 114. At the present time we have 74 females in this category. This is an increase of six (6) over 1973-74.

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SPA

The full-time female SPA numerical goal by June 1976 is 1187. On July 1, 1974, the number of females increased from 1132 to 1151. Female increases came in the classifications of officials and managers (+2), clerical (+13), laborers (+1), and service workers (+10).

Black and Female Student Enrollment

In addition, the following progress was made in black and female enrollment at the undergraduate and graduate levels:

Black Students

We have had increases in the numbers of black students at both the undergraduate and graduate levels. Our undergraduate black student enrollment for 1973-74 was 275. This fall we have 440 black students enrolled at the undergraduate level. This reflects a 60% increase. Our graduate black student enrollment for 1973-74 was 74. At the present time we have 102 black graduate students. This reflects a 37.8% increase. Combining the undergraduate and graduate enrollments, we have a 55.3% increase of black students over 1973-74.

Female Students

We have had female student increases at both the undergraduate and graduate levels. Our undergraduate female student enrollment for 1973-74 was 2,874. This fall we have 3,416 female students enrolled at the undergraduate level. This reflects a 18.9% increase. Our female graduate enrollment for 1973-74 was 520. This fall we have 678 female graduate students. This reflects a 30% increase over 1973-74. Combining the undergraduate and graduate enrollments, we have a 20.6% increase of female students over 1973-74.

ANALYSIS OF UTILIZATION AND  
IDENTIFICATION OF PROBLEM AREAS

A. METHODS OF ANALYSIS

Systematic analysis of potential problem areas related to equal opportunity on the NCSU campus began in the fall of 1970 with a study of the salary of female faculty members. Until that time the University had mainly concentrated on reviewing the numbers of people in each category. As a result of the salary analysis, adjustments were made in the salaries of several women and the review process has continued on an annual basis.

In January, 1971, HEW initiated a compliance review which culminated in a visit to the campus during the fall of 1971. In preparation for this review, NCSU developed a series of computer-generated reports on all EPA and SPA personnel. These reports are updated annually for EPA personnel and more frequently for SPA personnel. Essential quantitative information contained in the reports includes name, sex, race, rank or classification, salary, years of service, and highest degree earned. Utilization analysis have used these reports as their basis. Copies of the computer printout have been furnished HEW and University administrators.

Another analysis of utilization and salary was conducted independently during the NCSU Self Study process which spanned the period 1971-1973. In that report the faculty recognized the University's need to make progress in providing equal opportunity.

Present efforts to promote recruiting and recognition  
of faculty who are members of disadvantaged and/or minority

groups should be encouraged and expanded.  
(North Carolina State University Self Study Report,  
Chapter 7., page 27, Recommendation 8.)

B. UTILIZATION OF EPA PERSONNEL

Table 1 summarizes EPA personnel at North Carolina State University as of June, 1973, by race and Table 2 by sex. Tables 3-15 contain the same information for each of the planning units by race. Tables 16-28 summarize this same information for each of the planning units by sex. These tables indicate that NCSU needs to develop goals that will provide an increase in the number of black and female EPA employees at most ranks with particular emphasis being given to the upper faculty ranks where there are \_\_\_\_\_ black professors and \_\_\_\_\_ black associate professors and \_\_\_\_\_ female professors and \_\_\_\_\_ female associate professors. The wide variation of utilization among planning units reflects availability rather than patterns of discrimination at NCSU. The clustering of females and blacks in the lower ranks generally indicates the fact that many have been employed only recently and have not had time to be given promotion. In addition, past employment practices have tended to employ white males.

C. RECRUITMENT, PROMOTION, SALARY, AND CONDITIONS OF WORK -  
EPA PERSONNEL

Records do not exist that allow quantitative analysis of EPA recruitment procedures in the past. As part of the plan this situation will be corrected. Lack of records does not necessarily indicate lack of effort; it only reflects the traditional University procedure of keeping records related only to those individuals who are employed.

Table 29 summarizes the results of an analysis of promotion of faculty over



the past \_\_\_\_\_ years. The analysis was limited to academic departments in which females or blacks existed. The results of the study show that in the past females with the same background and degree took slightly longer to win promotion than their male colleagues. The data is so slight concerning black faculty that it is difficult to draw conclusions, but the existence of our Affirmative Action Plan should ensure that discrimination in promotion does not occur.

Tables \_\_\_\_\_ through \_\_\_\_\_ contain salary comparisons by race and sex for selected academic departments. The data reveal no salary discrimination by race, but they do reflect slightly results of past discrimination against females. Table \_\_\_\_\_ shows the special steps that have been taken since September, 1970, to correct any differences which the University could not justify on the basis of assessment of individual performance. Special attention is now given to starting salaries and annual increases in order to prevent the recurrence of discrimination in salary.

A comparison of promotion rates for the various academic ranks by race and sex indicates that in the past women may have been discriminated against in promotions. This conclusion must be tentative because there are numerous intangible factors considered in promotion decisions and these factors are not taken into account in the data. Nevertheless, it is clear that in the past it has taken females longer to gain promotion than men. Table \_\_\_\_\_ summarizes the data for departments with significant numbers of women.

Criteria for each rank as well as University policy on academic freedom and tenure, leave and other benefits are explained in the Faculty Handbook. This handbook is distributed to all EPA personnel at the time of their arrival on campus.

Evaluation for promotion and salary increases is based on subjective evaluation of individual merit related to the stated criteria. The primary evaluation occurs at the departmental level with reviews by the Dean and Provost.

As an illustration of the complexity of the decision concerning initial employment and promotion, the following outline represents the major factors which the University identified in an analysis of the decisions.

Initial Appointment to Faculty. The department head is responsible for the initial effective recommendation. Depending upon the organization of the department, the department head may consult as follows:

- a) Instructor - No one  
a personnel committee  
the entire department  
the senior faculty
- b) Assistant Professor - an elected or appointed search committee  
the entire department  
a personnel committee  
the senior faculty
- c) Associate Professor - an elected or appointed search committee  
the entire department  
a personnel committee  
the senior faculty
- d) Professor - a search committee, perhaps with members from other  
departments  
senior faculty

The approval of School Deans and the Provost is required for all appointments. For assistant professors and above, interviews with the Deans and Provost are required and the Graduate Dean is included if graduate faculty status is to be requested.

Rank is determined by the department head with the approval of the Dean and Provost. Individuals appointed to fill assistant professor positions who do not have their doctorate are appointed with the rank of instructor until they receive their degree. Usually the probable rank of a position is determined before the search is begun, i.e., a department decides it will fill an associate professorship and then begins to consider individuals.

Responsibility. The minimum requirements are those in the Faculty Handbook. The following factors are considered in making a specific offer:

- a) evidence of ability and interest in teaching
- b) evidence of potential contributions to scholarship and research
- c) experience
- d) market conditions for discipline specialty
- e) salaries in the department
- f) quality of educational background—source of highest degree and sponsor or director of dissertation
- g) recommendations
- h) publications including quality as well as quantity
- i) evidence of ability to participate in joint research projects
- j) evidence of interest in and ability for public service and extension activities
- k) compatibility with other members of the department

Depending on the mission of the department, criteria may be weighed differently. For instance, the Department of Entomology would emphasize research and extension while the Department of English would emphasize undergraduate teaching

since it does not have a doctorate level graduate program.

Criteria for Faculty Salary Decisions. There is no requirement that everyone must receive an increase, nor are there minimum criteria for allocating increases other than satisfactory performance of duties. Criteria which may be used include the following:

- a) teaching performance
- b) research contributions
- c) service to department, School, and University
- d) service to community, state and nation
- e) need to redress imbalances
- f) receipt of other offers
- g) market conditions for a particular field
- h) cost of living
- i) history of past increases
- j) general overall performance
- k) interpersonal relationships.

Workload for faculty is normally 12 credit hours of undergraduate teaching per semester with adjustments being made for teaching graduate courses and other appropriate academic duties as departmental resources permit. In essence workload is adjusted on an individual basis, but there does not appear to be any evidence of discrimination on the basis of race or sex in this area in NCSU.

Chul on P.E emales



*Mr. Simpson*

AFFIRMATIVE ACTION PLAN  
NORTH CAROLINA STATE UNIVERSITY

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Affirmative Action Plan  
North Carolina State University

PART I  
INTRODUCTION

A. THE EXTENT AND NATURE OF THE PLAN

This plan for affirmative action to provide equal employment opportunity at North Carolina State University is designed to serve two functions. First, it represents the University's compliance with Federal regulations requiring a written affirmative action plan. Second, it represents the University's response to a letter of findings of September 27, 1972, which presented the results of a compliance review by the staff of Region IV of the Office for Civil Rights. Insofar as possible, the University has attempted to incorporate the recommendations of the letter in this affirmative action plan, but the recommendations in the letter have also been addressed in a separate section of this document.

Organization of the Plan. The affirmative action plan for N. C. State University consists of three parts: Part I, Introduction; Part II, Policies and Procedures; and Part III, Analysis, Goals and Timetables.

B. EQUAL OPPORTUNITY POLICY

In accordance with section 103 of The Code of the University of North Carolina and in accordance with the aims and intent of this institution, it is our policy that admission to, employment by, and promotion in North Carolina State University shall be on the basis of merit, and there shall be no discrimination on the basis of race, color, creed, religion, sex, or national origin. It is also the policy of North Carolina State University to take positive action to further employment opportunity for women and minorities.

C. PROCEDURE USED TO DEVELOP THE PLAN

Initial steps in the development of the present affirmative action plan were taken in early November, 1972, when it was determined that the most effective method of developing a functional and effective plan for this campus would

be to follow the regular patterns of organization and administration. Accordingly, on November 8, the following affirmative action planning units were identified:

- School of Agriculture and Life Sciences
- School of Design
- School of Education
- School of Engineering
- School of Forest Resources
- School of Liberal Arts
- School of Physical and Mathematical Sciences
- School of Textiles
- Division of Student Affairs
- Library
- Office of Business Affairs
- University Extension
- Special Units

Each unit was asked to establish a planning committee which was to develop plans applicable to that unit. When combined with a general statement on policy and procedure these plans constitute the affirmative action plan for NCSU. Approaching affirmative action planning in this manner had several advantages. First, it followed normal organizational patterns of the University rather than imposing a new structure for administration of the plan on the existing structure. Second, this method of organization compelled each unit to conduct its own analysis of utilization and availability and to develop a plan that would work in that unit's context. Third, this approach meant that more individuals would be involved in developing affirmative action plans than would have been the case if a single central committee had been assigned this task. Wide participation is an important factor in the success of any endeavor in a collegial institution like the university.

The central administration of N. C. State under the direction of the acting Equal Employment Opportunity Officer, Provost Harry C. Kelly, worked with the General Administration of The University of North Carolina to provide data and other information to the planning units. Appendix A lists the material sent to the units in the process of planning.

Because of major differences in our procedures and responsibilities for professional personnel (EPA) as contrasted to staff personnel (SPA), the plan includes separate goals, timetables, and procedures for these groups of personnel even within a single unit. Such procedure is standard and practical and is



accepted by all involved at this University.

D. BASIC ASSUMPTIONS AND CONDITIONS UPON WHICH THE PLAN IS BASED

Certain basic assumptions and conditions underlie N. C. State University's affirmative action planning, and it seems prudent to list them at the beginning.

First, it is our position that N. C. State University has not been guilty of overt acts of discrimination in the past that have denied equal employment opportunity to individuals. We do acknowledge, however, that we have reflected societal patterns which have resulted in de facto if not de jure discrimination in employment. Our employment profile convinces us that we should take steps to change patterns that have developed over the years. Our focus, for this reason, has been on the future rather than on the situation as it now exists. We have concentrated on effecting changes.

Second, especially at the faculty level, many personnel decisions must be made on the basis of subjective evaluation of individual merit. For this reason, it is meaningless to attempt evaluation in terms of averages or formulas. Each case must be decided on its own merit. Although this condition means that comparisons are sometimes difficult, we think it is essential that individuals be considered as individuals and that the unique needs and circumstances of the hiring unit be taken into account. In short, we reject a formula approach to personnel decisions. We are willing to undertake the additional work necessary to continue making decisions on an individual basis. In practice this approach means that we do not think that all individuals of the same rank with the same years of service in the same department should necessarily have the same salary.

Third, as will be noted in subordinate analyses of availability, we must point out that N. C. State University's academic mission means that it emphasizes technological fields that are not at present highly attractive to females and minorities. Some reluctance to enter these fields may be the result of traditional attitudes on which this University can only attempt some change. The problem of why some students have been and are attracted to some fields of study is complex and beyond the power of the University to control. We can only work on the problem affirmatively. We cannot guarantee that our recruitment efforts will be

successful.

Fourth, like many other universities, N. C. State University is in a period of declining or stable resources. Enrollment, the basis on which we are allocated positions, is leveling off or increasing slightly. In addition, the General Assembly of North Carolina in 1971 changed the student-faculty ratio from 13.7 to 1 to 14.5 to 1. This means fewer faculty positions per 100 students. Federal support for research and student aid has declined significantly. For example, the value of our contracts and grants on July 1, 1972, was almost 40 percent lower than the previous year. Under these circumstances N. C. State University will have few new positions and because of the tight academic job market in general there will be few resignations. At the end of the 1972-73 academic year, only seven people with faculty rank resigned from our faculty of more than 1,000. Concurrently there is on this campus a high percentage of faculty holding academic tenure. In several schools nearly 80 percent of the faculty already has tenure. As a result of these factors the competition for new positions will be keen. It will be impossible to produce dramatic changes in this employment profile of all units, and promotions will be extremely difficult to obtain.

Finally, in all of our affirmative planning we are cognizant of certain basic provisions of the laws and interpretation of the laws by HEW. We have noted the prohibition against preferential treatment contained in subsection (j), section 703 of Title VII of the Civil Rights Act of 1964, As Amended:

Nothing contained in this title shall be interpreted to require any employer, employment agency, labor organization, or joint labor-management committee subject to this title to grant preferential treatment to any individual or to any group because of race, color, religion, sex, or national origin of such individual or group on account of an imbalance which may exist with respect to the total number or percentage of persons of any race, color, religion, sex, or national origin employed by any employer....

We are reassured by HEW's statement that "a nondiscriminatory selection pro-

cess does not mean that an institution should indulge in 'reverse discrimination' or 'preferential treatment' which leads to the selection of unqualified persons over qualified ones." Similarly we have developed our affirmative action plan on the assumption that there is a difference between the establishment of goals and quotas as stated by HEW. Our plan is presented in the context of compliance as described in the October 1, 1972, Higher Education Guidelines, Executive Order 11246:

The achievement of goals is not the sole measurement of a contractor's compliance, but represents a primary threshold for determining a contractor's level of performance and whether an issue of compliance exists. If the contractor falls short of its goals at the end of the period it has set, that failure in itself does not require a conclusion of noncompliance. It does, however, require a determination by the contractor as to why the failure occurred. If the goals were not met because the number of employment openings was inaccurately estimated, or because of changed employment market conditions or the unavailability of women and minorities with the specific qualifications needed, but the record discloses that the contractor followed its affirmative action program it has complied with the letter and spirit of the Executive Order. If, on the other hand, it appears that the cause for failure was an inattention to the non-discrimination and affirmative action policies and procedures set by the contractor, then the contractor may be found out of compliance. It should be emphasized that while goals are required, quotas are neither required nor permitted by the Executive Order. When used correctly, goals are an indicator of probable compliance and achievement, not a rigid or exclusive measure of performance.

E. RESPONSE TO LETTER OF FINDINGS

1. Academic personnel hiring and recruitment.

Recommendation: An availability study and salary comparisons should be made to determine the validity of such statements. Further, a person should be designated as an Equal Employment Opportunity Officer to assist in assuring that the requirements of

the Executive Order are met.

This recommendation has been followed as part of affirmative action planning.

2. Non-academic personnel hiring and recruitment.

Recommendation: The Central Personnel Office should assume complete control of all personnel functions of the University. The Equal Opportunity Employer tagline should be included in all job announcements and advertisements. Equal Employment Opportunity posters should be conspicuously placed on campus.

The Division of Personnel Services has increased its control over personnel functions to the extent to which present resources permit. Changes are described in the plan. The tagline has been added; posters have been placed.

The affirmative action plan speaks to the other points as well.

3. SPA placement.

Recommendation: The University should focus its employment practices on the non-utilization and under-utilization of Black and female employees. Further, the referral-to-job method should provide assurance that referrals will be made in accordance with Executive Orders 11246 and 11375.

The affirmative action plan deals with this recommendation.

4. Academic Personnel (EPA) Salary

Recommendation: The University shall be commended for steps taken to date. Continuous salary adjustments should be made until equality has been obtained. The University should set timetables for the achievement of pay equity as well as be prepared to substantiate any differences existing after such timetables have been met and notify this office.

Salaries for females have been given special attention with the aim of making them equal to the salaries of males with equal work qualifications. The significant differences that do exist are the result of judgments about the performance of individuals or the result of length of service.



5. Testing of SPA employees.

Recommendation: Strengthening of personnel functions such as having each department head notify the Personnel Office as to why a Black or female applicant was not chosen would reflect department practices as to whether such impromptu testing may be exclusionary.

The affirmative action plan shows that this action has been taken.

6. Academic personnel (EPA) advancement.

Recommendation: The University should develop procedures that will assure that promotion practices do not exclude eligible Blacks or females and notify Office for Civil Rights.

This affirmative action plan deals with this recommendation.

7. Non-academic personnel (SPA) advancement.

Recommendation: The University should become more involved in notifying directly eligible candidates for promotion. Procedures should be developed whereby the University can assure non-discrimination. Training programs should be provided with the ultimate goal of increasing job performance and providing the opportunity for advancement.

The affirmative action plan deals with this recommendation.



PART II

POLICIES AND PROCEDURES

A. POLICY DISSEMINATION

The equal employment opportunity policy and this University's commitment to taking positive action is stated in Part I, Section B above. Specific efforts at dissemination will be as follows:

INTERNAL DISSEMINATION

<u>Action</u>	<u>Responsibility</u>	<u>Date Effective</u>
EEO Posters posted	Director of Personnel and EEO Officer	Implemented
EEO statement in <u>Faculty Handbook</u>	EEO Officer	Implemented
Periodic memoranda to supervisors	EEO Officer	Continuing (See Appendix B)
Discussion and review of affirmative action plan with Deans, Directors, and Department Heads	EEO Officer and Provost	July 1, 1973, and continuing
Annual review of plan and progress with administration	EEO Officer and Chancellor	January 1, 1974
Review of affirmative action plan with General Faculty	EEO Officer	August, 1973
Review of affirmative action plan with Faculty Senate	EEO Officer	August, 1973
Review of affirmative action plan with Student Government	EEO Officer	August, 1973
Review of affirmative action plan with SPA personnel	EEO Officer	July 1, 1973, or as soon as Officer appointed

<u>Action</u>	<u>Responsibility</u>	<u>Date Effective</u>
Discussion of plan and policy in new SPA employee orientation sessions	Director of Personnel and EEO Officer	Implemented
Discussion of policy during staff training sessions	Director of Personnel	Implemented
Summary of plan published in faculty newspaper	EEO Officer	Fall, 1973
Discussion of plan with appropriate university committees	EEO Officer	Fall, 1973
Distribution of Plan	EEO Officer	30 days after HEW approval
EEO statement included on application routing sheets sent with application forms	Director of Personnel	Implemented
EEO statement included or notices of campus vacancies	Director of Personnel and EEO Officer	Implemented

#### EXTERNAL DISSEMINATION

EEO policy statement included on all recruitment material and advertisements for students, staff, and faculty	Dean of Student Affairs Director of Personnel EEO Officer	Implemented
EEO statement included on purchase orders, contracts, etc., as required by Executive Order 11246	Vice Chancellor for Finance and Business	Implemented
National and regional minority and women's organizations, institutions, and groups informed by letter of EEO policy	EEO Officer	Fall, 1973
Local community organizations informed of EEO policy by personal contact	EEO Officer	Fall, 1973

<u>Action</u>	<u>Responsibility</u>	<u>Date Effective</u>
Subcontractors, vendors, and suppliers notified in writing of EEO policy	Vice Chancellor for Finance and Business	Implemented

B. RECRUITMENT PROCEDURES - EPA PERSONNEL

University recruitment procedures will be modified in several ways to insure affirmative action is taken in the process of recruiting. The following list represents steps all units must be able to show that they take in recruitment.

1. Use Equal Employment Opportunity slogan on all descriptions of vacancies.
2. Advertise the vacancies in ways that would reasonably lead to application by minorities and females.
3. Review files of previous applications to determine if qualified minorities or females are in these files.
4. Notify through official communication potential candidates on campus who may wish to be considered for the vacant positions.
5. Explain why the final candidate was chosen by means of an explicit comparison with other individuals considered.
6. Maintain complete records of the search process including correspondence with those candidates who decline, withdraw or are not offered the position.
7. Keep all applications on file for a period of two years.

The Provost has the responsibility for insuring that this procedure is followed and he shall be assisted by the Equal Employment Opportunity Officer.

*Continuously during the year*  
~~Annually~~, all School and other affirmative action planning units will submit reports on their recruitment efforts which shall summarize the recruitment contacts for each position filled. Appendix B contains a reporting form which will be used.

C. INCREASING THE SUPPLY OF POTENTIAL EPA PERSONNEL

As the unit plans document, lack of available female and minority faculty is one of the major difficulties encountered by an institution with academic program emphases in the scientific, technological and professional fields. N. C. State University recognizes that one solution to this problem is the development of

potential faculty through training. For this reason several School plans emphasize recruitment of students, especially graduate students. This emphasis is considered a major aspect of our affirmative action planning because it represents the best long-range positive action possible and such recruitment is considered a major element of our goals.

*Bill  
Caldwell*

D. RECRUITMENT PROCEDURES - STAFF (SPA)

Several steps have been taken in the direction of centralized control of personnel actions by the Division of Personnel Services. This Division has formalized a procedure to insure that female and minority applicants are given due consideration in filling vacancies. The basic mechanism used for this purpose is the application routing sheet which accompanies the personal information for each candidate. A copy of the routing sheet is attached as Appendix C. Each unit filling a position is required to supply the requested information for each applicant referred to them before the position can be filled. In addition, through a memorandum, the Chancellor has required all vacancies to be listed in the Personnel Office and all advertising to be placed by that office. A copy of this directive is attached as Appendix D. In order to provide opportunities for upward mobility for those females and minorities already on campus, it is now N. C. State University's policy that all staff vacancies must be listed with the Division of Personnel Services and posted campus-wide five work days before outside applicants can be considered. The Division of Personnel Services has also encouraged present minority staff members to encourage other qualified individuals to apply at NCSU when vacancies arise.

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External actions are also part of our plans for making positive action to recruit females and minorities for staff positions. The following statements indicate positive action already taken and continuing:

<u>Affirmative Action</u>	<u>Responsibility</u>	<u>Target Date</u>
Place recruitment advertising with newspapers having predominantly minority or female circulation. All	Director, Division of Personnel Services	Continuing

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<u>Affirmative Action</u>	<u>Responsibility</u>	<u>Target Date</u>
advertisements to include tagline "An Equal Opportunity Employer."		
Expand mailing lists of staff vacancies to the Durham and Johnson County State Employment Offices.	Director, Division of Personnel Services	Continuing
<i>Maintain</i> Established close working relationships with officers of various community manpower programs including W.I.N. (Work Incentive Program), Wake Opportunities, New Careers, and N. C. Manpower Development Program. Also furnished these offices lists of current job openings ("Personnel Notes").	Director, Division of Personnel Services	Continuing
<i>Maintain close</i> Established working relationships with local predominantly black institutions resulting in the exchanging of vacancies and subsequent employment of minorities at North Carolina State University.	Director, Division of Personnel Services	Continuing
Annually conduct on-campus recruitment in at least five predominantly black colleges and universities in North Carolina.	Director, Division of Personnel Services	Continuing
Periodically mail "status" letters inviting inactive minority applicants to re-apply with the University.	Director, Division of Personnel Services	Continuing
Further disseminated staff vacancies through Wake Opportunities Manpower Pilot Program throughout the local black community.	Director, Division of Personnel Services	Continuing
Verbally reaffirm periodically our interest in employing minorities to current recruitment sources including Employment Security Commission, Office of State Personnel, manpower agencies, business schools, technical institutes, and Lion's Club Industries for the Blind.	Director, Division of Personnel Services	Continuing



As a result of these plans the recruitment for staff positions at NCSU should include more female and minority candidates thereby creating a pool of talent from which campus units may recruit to reach their goals. In addition, the upward mobility of females and minority members already on campus should be improved by these processes.

E. NEPOTISM POLICY

On April 13, 1973, the Board of Governors of The University of North Carolina adopted a new nepotism policy for EPA employees which extends the permissible employment of close relatives so long as no supervisory relationship is involved. Faculty and staff have been informed of this new policy. A copy of the policy is included as Appendix E.

For staff personnel the State nepotism policy has recently been revised to make it consistent with Federal regulations. A copy of this policy is attached as Appendix F.

F. PLACEMENT, PROMOTION, SALARY, AND CONDITIONS OF WORK - EPA PERSONNEL

Criteria for each rank as well as University policy on academic freedom and tenure, leave, and other benefits are explained in the Faculty Handbook, a copy of which is included as Appendix I. This handbook is distributed to all EPA personnel at the time of their arrival on campus. Evaluation for promotion and salary increases is based on subjective evaluations of individual merit related to the stated criteria. The primary evaluation occurs at the departmental level with reviews by the Dean and Provost. In order to insure that affirmative action for females and minority faculty will occur, the Provost will require each Dean to be able to produce an explanation in writing for any personnel action taken. If in the process of review of salary increases, for example, the Provost has concerns about the increase given one individual in comparison with another, he can ask for explanations of both actions. If the explanation does not appear to be satisfactory, appropriate action will be taken. Because N. C. State University recognizes the need to provide female and minority faculty the opportunity for advancement to higher ranks, reviews of promotions will be

conducted with this need in mind. Similarly, salary increases will be reviewed carefully in order to prevent differences arising that may be related to sex since the University has now virtually succeeded in eliminating such differences.

Workload for faculty is normally 12 credit hours of undergraduate teaching per semester with adjustment being made for teaching graduate courses and other appropriate academic duties as departmental resources permit. In essence workload is adjusted on an individual basis. To this date there does not appear to be any discrimination in workload at NCSU. To paraphrase the late Vince Lombardi, "all our faculty work alike, like dogs."

There is no discrimination in the policies or application of the policies related to other benefits for EPA employees.

*Bull*  
C  
G. PLACEMENT, PROMOTIONS, SALARY, AND CONDITIONS OF WORK - SPA PERSONNEL

A statistical evaluation of present staff positions indicates that on this campus there are 303 job classifications for the 2,140 staff employees. Of the 303 job classifications, the majority are filled by whites, with fewer than five persons in any one classification. Some of the job classifications at the lower skill level are all black; no black is in a job classification receiving pay over \$9,420 per annum. As one moves through the middle classifications and pay ranges into the upper job classifications and pay ranges, the race and sex of members occupying these classes show a predominance of white males.

Job classes in which there are five or more blacks and no whites are as follows:

Floor Maintenance Man  
Housekeeping Foremen  
Mail Clerk  
Housekeeping Supervisor

Job classifications in which there are five or more whites and no blacks are as follows:

Job Title  
Statistical Aide  
Agricultural Research Technician I  
Administrative Secretary  
Clerk IV

Accounting Clerk III  
Carpenter II  
Maintenance Mechanic II  
Electrician II  
Grounds Foreman  
Statistical Analyst  
Administrative Assistant  
Air Conditioning Mechanic  
Research Mechanic II  
Maintenance Mechanic IV  
Electronic Technician II  
Computer Programmer I  
Electronic Technician III  
Instrument Maker II  
Farm Superintendent II  
Research Analyst  
Computer Programmer II  
Consulting Engineer I

Since the central State of North Carolina Office of State Personnel establishes job classifications and salary ranges for classified positions at the University and since most employees progress through the salary steps according to predetermined policy, salary and other benefit inequity is not a problem. The problem appears to be in the underutilization of minorities and women in certain job classifications as noted above.

In order to help eliminate or revise any policy or practice which in effect is discriminatory, the Division of Personnel Services commits itself to assist all campus departments through good personnel management to utilize the skills of minorities and women at all levels of classified employment in keeping with their capability and potential for development. To accomplish these tasks, efforts will continuously be made to identify and use existing talent and potential through upgrading and promoting present employees and by broadening the search for useable talent outside the University. The following specific goals and timetables will substantiate this commitment. All of these activities will be undertaken in cooperation with the campus EEO Officer.

<u>Affirmative Action</u>	<u>Responsibility</u>	<u>Target Date</u>
Continue to work toward goal of identifying all underutilization of minority and female employees.	Director, Division of Personnel Services	Continuing
Make available to campus departments availability and work force data on recruiting area to be used for determining proper employee mix.	Director, Division of Personnel Services	Continuing
Implement a continuous review and as necessary make recommendations to Office of State Personnel to revise job specifications, especially minimum qualification requirements to achieve consistency with actual needs of the positions. (Initial review of present specifications to be completed by December, 1973.)	Director, Division of Personnel Services	Continuing
Prompt posting of all vacancies with attendant qualifications on weekly basis campus-wide in conspicuous places accessible to all employees, to include language that clearly informs candidates that commensurate job experience will be considered in filling of vacancies.	Director, Division of Personnel Services	Effective immediately and continuing
Publication and notification to all staff employees of training programs (both formal and O-J-T) available to upgrade skills.	Training Officer	Completion date - September, 1973, and continuing as new programs become available.
Training sessions at least twice a year to brief supervisors on subject of increased utilization of minorities and women at all levels of the staff work force and inclusion of the subject in all orientation sessions for new employees.	Training Officer	Continuing
All departmental tests given to staff employees to demonstrate fitness to perform job, when required or appropriate, shall be approved by Division of Personnel Services, and shall in all cases be job related.	Director, Division of Personnel Services	Effective immediately and continuing



<u>Affirmative Action</u>	<u>Responsibility</u>	<u>Target Date</u>
Campus policy on nepotism shall be implemented according to newly approved policy passed by State Personnel Board.	Vice Chancellor for Finance and Business	Effective immediately
Each list of referrals made for staff job openings in campus departments where apparent underutilization of minority and female employees exists shall include the name of at least one minority and/or one female candidate for consideration if such candidates are available.	Director, Division of Personnel Services	Effective immediately
Each referral will be accompanied by an application routing sheet which must be returned to Personnel Services with written justification why particular applicant was selected or why other applicants were not selected.	Director, Division of Personnel Services	Continuing
A comprehensive recruitment program will be expanded and implemented as designed specifically to attract minority group members and women, and will include the following activities: a. Increase on-campus recruitment activity at predominantly black colleges and universities to recruit research technicians, and at predominantly female colleges and universities to recruit females. b. Increase advertisements in media with predominantly black circulation or audiences. c. Control all advertisements for staff centrally by Division of Personnel Services.	Director, Division of Personnel Services	Effective immediately
Interview, select, and refer in accordance with equal employment concept, including continuous review of	Director, Division of Personnel Services and EEO Officer	Continuing

<u>Affirmative Action</u>	<u>Responsibility</u>	<u>Target Date</u>
recruitment procedures to assure that barriers to successful recruitment do not exist, (i.e., negative attitudes of the interviewer, assumptions about applicants' interest and presumptions of employment stability, and referral procedures that tend to channel applicants to jobs that are thought of as "female" jobs, "male" jobs and "minority" jobs).		
Monitor departmental selection, promotion, demotion, transfer, disciplinary and layoff practices through internal audit and reporting system.	Director, Division of Personnel Services	Continuing
Campus visitation program in which the Personnel Director visits all School Deans for the purposes of discussing present equal employment policies and procedures (i.e., location and posting of "Personnel Notes" and EEO posters, past employment practices of departments) and of gaining suggestions as to how the Division of Personnel Services can better serve in helping units to attain affirmative action goals.	Director, Division of Personnel Services	Continuing
Follow-up on minority referral by phone and/or visit to determine why individuals are hired or not hired.	Director, Division of Personnel Services	Immediate and continuing
Distribute letters under the Chancellor's signature encouraging minority and female employees to apply for promotional opportunities as they appear in "Personnel Notes." The letter will include a statement which requests that employees who do not have access to "Personnel Notes" notify the Division of Personnel Services so that copies can be made available to them.	Director, Division of Personnel Services	Initial completion September, 1973 - to be continued as needed



<u>Affirmative Action</u>	<u>Responsibility</u>	<u>Target Date</u>
With the goal of increasing job performance and enhancing promotional opportunities, the University will continue to provide Supervisory Development Training programs for first-line and intermediate level supervisors. Adult Basic Education courses which have already been conducted on campus during work hours for employees with less than eighth-grade level education will be continued as need arises. Approved apprenticeship training programs have been established in the Print Shop and in the Physical Plant Division to be used for training purposes. Employees are eligible for and encouraged to attend, at no cost, job-related courses on campus or at other Raleigh area colleges and universities.	Training Officer	Continuing

All of these programs will be continued with stress being placed upon enhancing promotional opportunities of women and minority groups. Additionally, if feasible to do so, a high school equivalency program will be established on campus in cooperation with the Department of Community Colleges for those employees with less than high school level education.

H. CHILD CARE

North Carolina State University does not have the resources necessary to offer a child care program for students, staff and faculty, singly or collectively.

I. TEST VALIDATION

N. C. State University does not test applicants for employment except in certain skills for certain staff positions. When such skills testing is conducted, it is done with work that is part of the regular operation of the unit and part of the regular responsibility of the position.

#### J. GRIEVANCE PROCEDURE

N. C. State University has an established grievance procedure for faculty personnel. The procedure is described in the Faculty Handbook. It has already been used to hear one grievance related to sex discrimination. Staff employees have a grievance procedure available to them which is described in Appendix G. The procedure provides means of hearing charges of sex and race discrimination. Edited copies are placed in new employee orientation packets.

In addition to these grievance procedures, several unit affirmative action plans provide for a process of handling grievances through the unit equal opportunity officer or committee.

#### K. GOALS AND TIMETABLES

Part III, Sections A through N contain the analysis of utilization and availability, goals and timetables for the affirmative action planning units at N. C. State University. Most plans provide separate goals for faculty and staff personnel and, when appropriate, students.

A review of the plans reveals a variety of methods of stating goals. In our view such diversity is a strength of this plan because it couches goals in terms that are applicable for each unit and does not impose the same rigid format on all units. Since the goals and timetables have been developed by the units themselves, successful attainment by means of good faith efforts is also likely to occur. The plans have been reviewed by the Provost and Chancellor and are forwarded with their endorsement.

#### L. RESPONSIBILITY FOR IMPLEMENTATION

Each unit plan describes the responsibility for implementation within that unit. For N. C. State University as a whole, an equal opportunity officer will be designated and assigned to the central administration by the beginning of the 1973-74 academic year. At present such responsibility is handled by the Provost along with other responsibilities. It is our intention to change this situation

so that an officer will have as his primary responsibility the monitoring of affirmative action on this campus. The implementation of this plan will proceed and be organized along the following lines.

<u>Activity</u>	<u>Responsibility</u>	<u>Timetable</u>
Disseminate policy and plan both internally and externally	EEO Officer	July, 1973, through January, 1974, and continuing thereafter
Identify problems encountered in reaching goals	EEO Officer and unit EEO Officer	Continuing
Develop mechanism for handling reports and identify need for additional reports	EEO Officer	June, 1974, and continuing
Review reports and identify problems that need attention	EEO Officer	January, 1974
Assist units in recruitment efforts	EEO Officer	Fall, 1973
Establish contact with minority and women's groups	EEO Officer	Fall, 1973
Liaison with Federal and State Government and UNC on EEO matters	EEO Officer	As soon as appointed
Attend meetings and conferences in order to keep abreast of latest development in providing EEO	EEO Officer	Continuing
Audit progress in meeting goals and taking other affirmative steps	EEO Officer	June, 1974, and continuing
Revise goals and timetables to reflect development and progress	EEO Officer in cooperation with unit officers and committees	July, 1974
Periodic review of campus' technical compliance with laws and Executive Orders 11246 and 11375	EEO Officer	January, 1974, and continuing

<u>Activity</u>	<u>Responsibility</u>	<u>Timetable</u>
Annual report on affirmative action progress	EEO Officer	July, 1974, and continuing

M. REPORTING PROCEDURE

A number of reports will be generated in order to monitor and assess the need for and progress in providing equal employment opportunity at N. C. State University. Copies of all reports will be available to the EEO Officer who will be responsible for analysis and for bringing problems to the attention of appropriate individuals. The following list includes reports currently planned. The EEO Officer will initiate additional reports as he deems them necessary.

<u>Report</u>	<u>Type of Employee Covered</u>	<u>Date</u>
Unit employment profile	EPA & SPA	December
Recruitment summary	EPA	June
Salary increase analysis	EPA	April (see Appendix H)
Promotion review	EPA	April (see Appendix H)
Application routing sheet	SPA	Continuous
Job order control sheet	SPA	Continuous
Applicant register	SPA	Continuous
Exit interviews	SPA	Continuous
Analysis of recruitment source by placement	SPA	June
Placement report	SPA	Monthly
Recruitment source evaluation	SPA	July
Affirmative Action Progress Report	EPA/SPA	July
1) Progress in meeting goals and assess		
2) Review of changes in employment profile		
3) Review of changes in analysis of availability		
4) Plans for changes in procedure and goals for next year		

N. PUBLICATION

After its approval by HEW the University will make this plan available to all personnel.

PART III

ANALYSIS, GOALS AND TIMETABLES

A. AN OVERVIEW OF AVAILABILITY

Detailed analysis of utilization and availability is contained in the separate unit plans, but it also seems appropriate to provide a general discussion of availability.

Since faculty recruitment at North Carolina State is conducted on a national basis and since the doctorate or its equivalent remains a basic requirement for faculty appointment, a review of data on doctoral degrees awarded provides a valid means of assessing availability for faculty.

TABLE 1

Doctor's Degrees Awarded in Selected Disciplines in the United States by Sex, 1961-62 through 1970-71

Discipline	Ten-Year Total	Total Female	% Female
Agriculture	5,562	131	2
Biological Sciences	23,470	3,337	14
Engineering	24,948	123	0.5
Mathematics	8,492	578	7
Physical Sciences	32,449	1,591	5
Social Sciences	25,053	3,000	12

Source: Office of Education, Bureau of Higher Education.

Table 1 shows doctorates awarded to females over a ten-year period in disciplines emphasized at NCSU. The variation among disciplines is striking with the major implication being that in many instances females are simply not available or in very short supply. Since there is no comparable data on minorities, all discussion about availability must be based on estimates which suggest that although about one percent of doctorates are held by blacks, there appears to be great variation among disciplines, as Table 2 shows.



TABLE 2

Distribution of Black Ph.D.'s by Discipline, 1969  
 (Results of Ford Foundation Survey with 1,096 respondents)

Field	Number	Percent
Education	313	29
Social Sciences	288	26
Biological Sciences	142	13
Humanities	136	12
Physical Sciences	129	12
Other (Agriculture, Business, Engineering, Home Economics, Religion)	88	8
<b>Total</b>	<b>1,096</b>	

Clearly there is a very limited supply of both blacks and females in many of the fields in which this University recruits faculty.

Closely related to availability of faculty is the question of availability of graduate students. Table 3 shows the number of females and blacks who received bachelor's degrees in North Carolina over a three-year period in selected disciplines closely related to the academic programs at North Carolina State University.

TABLE 3

Number of Bachelor's Degrees Awarded in Selected Disciplines in North Carolina by Race\* and Sex, 1968-69, 1969-70, and 1970-71

	1968-69	1969-70	1970-71
Agriculture Total	106	101	212
Black	17	13	6
Female	1	6	11



	1968-69	1969-70	1970-71
Biological Sciences Total	788	863	850
Black	129	133	144
Female	274	318	295
Engineering Total	709	754	965
Black	33	28	40
Female	3	4	6
Mathematics Total	818	774	699
Black	68	88	63
Female	370	345	315
Physical Sciences Total	555	555	540
Black	38	30	38
Female	87	71	77
Social Sciences Total	3968	4246	4352
Black	525	567	737
Female	1391	1500	1578

\* Estimate based on graduates from predominantly black institutions.

Source: Statistical Abstract of Higher Education in North Carolina, 1969-70, 1970-71, 1971-72.

Looking at this data, one can estimate the pool of potential graduate students in North Carolina. If one assumes that about ten percent of bachelor's degree holders will pursue graduate study in the field of the undergraduate major, the number of potential black graduate students is very small except in the social sciences; and the number of potential female graduate students is small except in mathematics and the biological and social sciences. Because of the increased out-of-state tuition rate imposed by the 1971 General Assembly and the decline in Federal support of graduate study and research, this campus has to rely more upon in-state students to fill its programs. If few women and blacks are available as potential graduate students, it is difficult to honestly predict that we will be highly successful in attracting more female and minority graduate students in order to develop more potential female and minority faculty.

Although our non-academic personnel recruitment area is generally considered to be local, it is informative to look at the data in Table 4 which show production of trained manpower on a state-wide basis for 1971-72.

TABLE 4

Number of Associate Degrees and Diplomas Awarded by North Carolina Community Colleges and Technical Institutes in 1971-72 by Race and Sex in Selected Disciplines

College Transfer Programs			
	Total	Black	Female
Agriculture and Natural Science	8	0	0
Engineering	20	0	0
Mathematics	13	0	7
Science	26	1	7
Textiles	0	0	0
Occupational Programs			
	Total	Black	Female
Agricultural and Biological Science Technologies	208	6	36
Engineering and Science Technologies	908	64	45
Office Technologies	1653	267	956
Trades and Industry Occupations	2391	471	455

Source: Department of Community Colleges

It is obvious that among community college and technical institute students there is very little interest in programs emphasized by NCSU, and thus a potential source of transfer students has not materialized. More significant is the data on occupational programs which show that except for the office technologies and trade and industry vocations neither blacks nor females appear to be available in significant numbers. If these data are typical, then NCSU should expect to encounter great difficulty in locating blacks and females qualified for many of

its SPA classifications in agriculture, the sciences, and engineering. Tables 5 and 6 provide a framework for assessing availability of potential SPA personnel locally.

TABLE 5  
1971 Civilian Work Force Estimate for Wake County

	Total	Female		Minority	
		#	%	#	%
Total Work Force	118,170	49,150	42	22,660	19
Employed	115,320	47,510	41	21,560	19
Unemployed	2,850	1,640	57	1,100	39

TABLE 6  
1970 Census Data Showing Personnel in Selected Occupational Groups in Wake County by Sex and Race

	Total	Female		Minority	
		#	%	#	%
Clerical and Kindred Workers	20,234	15,424	76	1,627	8
Craftsmen, Foremen and Kindred Workers	9,929	624	6	1,651	17
Laborers, except farm	3,326	306	9	1,645	49
Service Workers except private household	9,620	5,280	55	4,017	42

Although minorities are estimated to comprise about 19 percent of the work force in Wake County, the information in Tables 4 and 6 suggests that the qualified workers in every job category who are minorities do not represent 19 percent of the work force in each category. Availability at the SPA level varies as much by type of position as does EPA availability by academic discipline.

*Check the statement with Rev. Calhoun*

OFCC: Contractor Evaluation Checklist

The following checklist, issued as Attachment A to Order No. 14 (Revised) (See 401:151), was designed by the Office of Federal Contract Compliance for use by compliance officers in making an offsite review of a nonconstruction contractor's experiences under his Affirmative Action Plan.

CONTRACTOR EVALUATION  
CHECKLIST

(Off-site Review—AAP and  
Supporting Data)

Name of Contractor .....

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Address of Contractor .....

---

Date of Letter Sent Requesting AAP

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Date Receipt of AAP .....

---

Type of Review (Pre-Award, Post Award,  
Follow-up Complaint) .....

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Name and Telephone Number of Contractor  
EO Officer .....

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Part A—Essential Data

A. Section 60-2.11, Required Utilization  
Analysis

The requirements of Section 60-2.11  
are as follows:

(a) An analysis of all major job classifications at the facility, with explanation if minorities or women are currently being underutilized in any one or more job classifications (job "classification" herein meaning one or a group of jobs having similar content, wage rates and opportunities). "Underutilization" is defined as having fewer minorities or women in a particular job classification than would reasonably be expected by their availability. In making the work force analysis, the contractor shall conduct such analysis separately for minorities and women.

(1) In determining whether minorities are being underutilized in any job classification the contractor will consider at least all of the following factors:

(i) The minority population of the labor area surrounding the facility;

(ii) The size of the minority unemployment force in the labor area surrounding the facility;

(iii) The percentage of the minority work force as compared with the total work force in the immediate labor area;

(iv) The general availability of minorities having requisite skills in the immediate labor area;

(v) The availability of minorities having requisite skills in an area in which the contractor can reasonably recruit;

(vi) The availability of promotable and transferable minorities within the contractor's organization;

(vii) The existence of training institutions capable of training persons in the requisite skills; and

(viii) The degree of training which the contractor is reasonably able to undertake as a means of making all job classes available to minorities.

(2) In determining whether women are being underutilized in any job classification, the contractor will consider at least all of the following factors:

(i) The size of the female unemployment force in the labor area surrounding the facility;

(ii) The percentage of the female work force as compared with the total work force in the immediate labor area;

(iii) The general availability of women having requisite skills in the immediate labor area;

(iv) The availability of women having requisite skills in an area in which the contractor can reasonably recruit;

(v) The availability of women seeking employment in the labor or recruitment area of the contractor;

(vi) The availability of promotable and transferable female employees within the contractor's organization;

(vii) The existence of training institutions capable of training persons in the requisite skills; and

(viii) The degree of training which the contractor is reasonably able to undertake as a means of making all job classes available to women.

Yes\* No Unknown\*\*

1. a. Is there a utilization analysis for minorities? ..... \_\_\_\_\_

b. Does it consider the points itemized in Section 60-2.11(a) (1)? ..... \_\_\_\_\_

c. Describe any deficiencies with the analysis ..... \_\_\_\_\_

The Compliance Office should use a narrative in addition to this checklist approach whenever necessary to adequately respond to the following inquiries.

2. a. Is there a utilization analysis for women? ..... \_\_\_\_\_

b. Does it consider the points itemized in Section 60-2.11 (a) (2)? ..... \_\_\_\_\_

c. Describe any deficiencies with the analysis ..... \_\_\_\_\_

\*If question is not applicable to the contractor, note N/A

\*\*Where information needed to complete this checklist is unavailable, use this column



B. Section 60-2.12, Establishment of Goals and Timetables

Yes No Unknown

1. Are the goals the contractor has set significant and attainable? \_\_\_\_\_
2. Will the goals correct deficiencies? ..... \_\_\_\_\_
3. Are these separate goals and timetables for minorities and women to the extent required by Section 60-2.10? ..... \_\_\_\_\_
4. Has the contractor provided all evidence requested to demonstrate that all levels of management have been involved in the goal setting process? ..... \_\_\_\_\_
5. Has the contractor considered the expansion, contraction and turnover of the work force in developing its goals and timetables?.... \_\_\_\_\_
6. If the contractor has not established a goal, does his AAP analyze the factors in Section 60-2.11? ..... \_\_\_\_\_

C. Section 60-2.23, Identification of Problem Areas

1. Complete the following:

- a. Describe goal setting method used by contractor.
- b. Review the contractor's degree of attainment of his current affirmative action plan goals and note any problems.
- c. Complete Table Q of the Coding Sheet. If an on-site review is to be conducted, Table Q may be left until the on-site review, but suitable worksheets should now be developed.



d. Minority Representation Table (express as percentage)

Listing of Major* Job Classifications	AAP Goal	End of Last Period	Current	Percent of Goal Attain.
Official/Manager .....	_____	_____	_____	_____
Professional .....	_____	_____	_____	_____
Technician .....	_____	_____	_____	_____
Sales Worker .....	_____	_____	_____	_____
Office/Clerical .....	_____	_____	_____	_____
Craftsman .....	_____	_____	_____	_____
Operative .....	_____	_____	_____	_____
Laborer .....	_____	_____	_____	_____
Service Worker .....	_____	_____	_____	_____
Total .....	_____	_____	_____	_____

\*These would be subdivided into groupings of common job classifications, earnings ranges or common skill groups for each category.

e. Female Representation Table (express as percentages)

Listing of Major* Job Classifications	AAP Goal	End of Last Period	Current	Percent of Goal Attain.
Official/Manager .....	_____	_____	_____	_____
Professional .....	_____	_____	_____	_____
Technician .....	_____	_____	_____	_____
Sales Worker .....	_____	_____	_____	_____
Office/Clerical .....	_____	_____	_____	_____
Craftsman .....	_____	_____	_____	_____
Operative .....	_____	_____	_____	_____
Laborer .....	_____	_____	_____	_____
Service Worker .....	_____	_____	_____	_____
Total .....	_____	_____	_____	_____

\*These would be subdivided into groupings of common job classifications, earnings ranges or common skill groups for each category.

- 2. What is the percent of minority applicants? ..... \_\_\_\_\_
- 3. What is the availability of minorities in the local work force expressed as a percentage of the local work force? ..... \_\_\_\_\_
- 4. What is the percent of female applicants? ..... \_\_\_\_\_
- 5. What is the availability of women in the local work force expressed as a percentage? ..... \_\_\_\_\_
- 6. Are there written job descriptions? ..... \_\_\_\_\_
- 7. Does your review of the application form indicate any problem? ... \_\_\_\_\_
- Please explain ..... \_\_\_\_\_

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- 8. Have all tests that are used been validated to the extent required by the OFCC Testing Order? ..... \_\_\_\_\_
- 9. a. What percent of hires by major job classification have been minority? ..... \_\_\_\_\_
- b. Is this improving the utilization condition for underutilized areas? ..... \_\_\_\_\_
- 10. a. What percent of hires by major job classification have been women? ..... \_\_\_\_\_
- b. Is this improving the utilization condition for underutilized areas? ..... \_\_\_\_\_
- 11. What percent of total promotions have been minority? ..... \_\_\_\_\_
- 12. Is this equal to or greater than the percent of the minority representation in the contractor's work force? ..... \_\_\_\_\_

Yes No Unknown

13. What percent of total promotions have been women? .....

\_\_\_\_\_

14. Is this equal to or greater than the percent of the female representation on the contractor's work force? .....

\_\_\_\_\_

15. a. Are there inhibiting factors to equal opportunity for minorities in the transfer system? .....

\_\_\_\_\_

b. Please explain: .....

\_\_\_\_\_

16. a. Are there inhibiting factors to equal opportunity for women in the transfer system? .....

\_\_\_\_\_

b. Please explain: .....

\_\_\_\_\_

17. Does it appear that the facility and company sponsored events are open to all and participated in by all? .....

\_\_\_\_\_

18. a. Are there inhibiting factors to equal opportunity in the seniority practices of the company? .....

\_\_\_\_\_

b. Please explain: .....

\_\_\_\_\_

19. Are minorities significantly underrepresented in apprenticeship or other training programs? .....

\_\_\_\_\_

Please explain: .....

\_\_\_\_\_

Yes No Unknown

20. Are women significantly underrepresented in apprenticeship or other training programs? .....  
Please explain .....

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21. Does the company focus on issues affecting minorities and women as set forth in Section 60-2.23 and does it address steps to meet such as those suggested in Section 60-2.24; i.e., housing, child care, transportation, etc., as they impact recruiting/employment? .....  
Please explain .....

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D. Section 60-2.1, Corrective Action Programs

1. Has the contractor developed a corrective action program to the extent required by Section 60-2.1? .....

2. Was this included as part of the contractor's AAP or a separate program? .....  
What relief has the contractor suggested for members of an identified affected class? .....

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Part B — Additional Data

A. Section 60-2.20, Development or Reaffirmation of Policy

1. Does the contractor's AAP include an EEO policy statement or reaffirmation thereof? .....

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2. Does the Policy Statement address those items noted in 00.2.20, paragraphs 1 through 4 in their entirety? .....

\_\_\_\_\_

a. If no, in what respects is the statement deficient .....

\_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

B. Section 60-2.21, Dissemination of the Policy

1. Has the contractor provided substantiation of the Policy Statement in the contractor's policy manual? .....

\_\_\_\_\_

2. Are there examples of it being publicized in company publications? .....

\_\_\_\_\_

3. Has the contractor provided substantiation that management meetings have been held relative to the requirements of Sec. 60-2.21? ...

\_\_\_\_\_

4. Has the contractor provided substantiation that employees have attended meetings relative to the requirements of Sec. 60-2.21? .....

\_\_\_\_\_

5. Has the contractor provided substantiation that EO is covered in new employee orientation and management training? .....

\_\_\_\_\_

6. Has the contractor provided substantiation that union officials have been informed of the policy? .....

\_\_\_\_\_

7. Are there nondiscrimination clauses in all union contracts? ...

\_\_\_\_\_

8. Have there been articles published on EO programs, progress reports, etc.? .....

\_\_\_\_\_

9. If employees are featured in image or product advertisements, do they show minorities and women? .....

\_\_\_\_\_



Yes No Unknown

10. Is there evidence of communications to employees concerning the contractor's AAP? ..... \_ \_ \_

11. Have all recruiting sources the contractor uses been informed verbally and in writing of company policy? ..... \_ \_ \_

12. Is the EO Clause incorporated in the contractor's Purchase Order? ..... \_ \_ \_

13. Has the contractor provided substantiation that it is notifying minority/female organization in writing of the company policy? ..... \_ \_ \_

14. Is there evidence that the contractor communicates to prospective employees the existence of the AAP? ..... \_ \_ \_

15. Are minority and female employees shown in consumer or help wanted advertising? ..... \_ \_ \_

16. Has the contractor provided substantiation that it notifies sub-contractor, vendor and suppliers of company EO policy? ..... \_ \_ \_

C. Section 60-2.22, Responsibility for Implementation

1. Is there evidence that an executive has been appointed as director or manager of the Company EO program? ..... \_ \_ \_

2. a. Is there a description of the executive responsibilities? ... \_ \_ \_

b. Does it include those elements as noted in Section 60-2.22, paragraph (a)? ..... \_ \_ \_

3. Is there a description of line management responsibilities? ... \_ \_ \_

4. Does line management identify problem areas and establish local goals and objectives? ..... \_ \_ \_

Yes No Unknown

5. Is local management active in minority and female organizations and/or community programs? ..... \_\_\_\_\_

6. Does local management conduct periodic audits of training, hiring, promotions, etc.? ..... \_\_\_\_\_

7. Does the local senior management conduct discussions with other management to ensure that the policies are being followed? ..... \_\_\_\_\_

8. Does management review qualifications to ensure minorities and women are given full opportunities for transfer and promotions? ..... \_\_\_\_\_

9. Is career counseling available for all employees? ..... \_\_\_\_\_

10. Does management conduct periodic audits to ensure posters are displayed, facilities are desegregated, minority and female employees get a full opportunity in company sponsored educational training and recreational activities? ..... \_\_\_\_\_

D. Section 60-2.24, Development and Execution of Programs\*

1. Is there evidence that the contractor reviews position descriptions? ..... \_\_\_\_\_

2. Are worker specifications consistent for the same job? ..... \_\_\_\_\_

3. Are position descriptions available to all members of management? ..... \_\_\_\_\_

4. Are recruiters trained in EO? ..... \_\_\_\_\_

5. Is there evidence of an active involvement with minority organizations? ..... \_\_\_\_\_

\* Note: Certain items in Sec. 60-2.24 are omitted as they are most appropriate for on-site review, if one is done.

Yes No Unknown

6. Is there evidence of an active involvement with female organizations? .....

\_\_\_ \_\_\_ \_\_\_

7. Do minority and female employees refer applicants? .....

\_\_\_ \_\_\_ \_\_\_

8. Are there minority and female employees on the personnel relations staff? .....

\_\_\_ \_\_\_ \_\_\_

9. Does the company participate in job fairs or career days? .....

\_\_\_ \_\_\_ \_\_\_

10. Is there evidence of an active recruiting program at minority schools? .....

\_\_\_ \_\_\_ \_\_\_

11. Is there evidence of an active recruiting program at female schools? .....

\_\_\_ \_\_\_ \_\_\_

12. Is the percent of terminations for minorities higher than for majorities? .....

\_\_\_ \_\_\_ \_\_\_

13. If so, is there a valid rationale? .....

\_\_\_ \_\_\_ \_\_\_

Please explain: .....

\_\_\_ \_\_\_ \_\_\_

14. Is the percent of terminations for females higher than for males? .....

\_\_\_ \_\_\_ \_\_\_

15. If so, is there a valid rationale? .....

\_\_\_ \_\_\_ \_\_\_

Please explain: .....

\_\_\_ \_\_\_ \_\_\_

E. Section 60-2.25, Internal Audit and Reporting System

1. Is there evidence that the contractor monitors its affirmative action program? .....

\_\_\_ \_\_\_ \_\_\_

Yes No Unknown

2. Does the contractor require formal reports from managers on the accomplishment of goals? .....

\_\_\_ \_\_\_ \_\_\_

3. Is top management aware of the progress of the EO program? ....

\_\_\_ \_\_\_ \_\_\_

F. Section 60-2.26, Support of Action Programs

1. Is the contractor management involved in external affirmative action programs? .....

\_\_\_ \_\_\_ \_\_\_

2. Are employees encourage to participate in outside organizations? .....

\_\_\_ \_\_\_ \_\_\_

3. Does the contractor support outside training programs? .....

\_\_\_ \_\_\_ \_\_\_

4. Does the contractor support schools in order to assist minorities and females? .....

\_\_\_ \_\_\_ \_\_\_

5. Does the contractor publicize EO achievements? .....

\_\_\_ \_\_\_ \_\_\_

6. Does the contractor support organizations such as NAB, etc? ...

\_\_\_ \_\_\_ \_\_\_

G. Section 60-2.13, Additional Ingredients of AAP

1. Has the contractor provided evidence to support the fact that the contractor is abiding by the Sex Discrimination Guidelines (41 CFR pt. 60-20)? .....

\_\_\_ \_\_\_ \_\_\_

2. Is there evidence that the contractor is considering minorities and women not in the work force? .....

\_\_\_ \_\_\_ \_\_\_

H. Explain Contractor's performance against previous goals: .....

\_\_\_ \_\_\_ \_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

D - Transfer and Promotion Practices

Should this paragraph be included?

~~Grant~~



The ratio of minorities or women referred to the hiring supervisor has been reported by the University.

D. Analyze: "Transfer and promotion practices." *omit*

~~The University administration will respond to transfer and promotion practices as it applies to SPA employees.~~ There are two <sup>FEMALE</sup> EPA employees in the School of Engineering that fall in the ~~minority category, both of these being women.~~ Their situation has been repeatedly and carefully analyzed with regards to promotion and also with regards to possible transfer. Both have been accorded full consideration for promotion. Every possible consideration has been extended to these individuals and that the procedures per se do not operate to favor one group over another.

E. Analyze: "Facilities, company sponsored recreation and social events, and special programs such as education assistance."

The School does not have company sponsored recreation and social events. The School does have funds available for professional development. On an overall basis, the women professional employees have received more than prorata share of these funds during the past five years.

F. Analyze: "Seniority practices and seniority provision of union contracts."

There are no unions among faculty or SPA employees within the School of Engineering; ergo, there are no union contracts.

G. Analyze: "Apprenticeship programs."

There are no apprentice programs within the School of Engineering; therefore, this section does not apply.

Rights and Benefits - Salary

Delete?

1. "Compliance of personnel policies and practices with the Sex Discrimination Guidelines of 41 CFR Part 60-20."

The University plan will contain information concerning this item.

2. "In hiring decisions, assignment to a particular title or rank may be discriminatory. For example, in many institutions women are more often assigned initially to lower academic ranks than are men."

The University plan will contain information concerning this item.

3. "Anti-nepotism policies."

The central plan will contain information concerning this item.

4. "Rights and Benefits-Salary."

Current groupings within the School are such that SPA employees follow University and State guidelines regardless of sex, color or race. There are two <sup>FEMALE</sup> minority group EPA employees, one of whom makes significantly less than others carrying the same job title. This case has been repeatedly reviewed at several administrative levels, and those concerned are convinced that the differential is justified on a performance basis.

Is this statement ok?  
Last sentence of 1st paragraph.

Delete where marked.

Turnover among this group is much lower than among the SPA clerical force. Based on estimates of retirement and on statistics of recent turnover, we would expect to have three vacancies per year during the next three years. The technical institutes are graduating people with one year and two year certificates or degrees, some of which are appropriate to the skills and abilities needed by the School of Engineering (Appendix I, item No. 3). The School sets as its goal, for this entire group, three black people in this area by 1976. (We do not see great pressures for employing women in these positions; *Debit* for many of the jobs are physically demanding; ~~however,~~ Women will be given every consideration, though the technical institute data indicate that extremely low numbers of women select engineering technology fields.

Students:

The School of Engineering has 1.7% of its undergraduates as blacks, about the same percentage as for the University as a whole. The School has four black graduate students or 1.0%, whereas the University has 42 or 1.8%. These figures include both full and part-time students. Information is based on enrollment statistics reported by the University for compliance with Title VI of the Civil Rights Act of 1964.

Enrollment of blacks is not large enough either at the School or University level. Through release time funds made available by the Provost's office, a faculty member devoted part of his time during the spring 1973 semester to the recruiting of undergraduate black students.



- C. 2 "Application and related pre-employment forms not in compliance with federal legislation"

The application forms used by North Carolina State University for recruiting SPA employees are supplied by the Central Office of State Personnel. These forms were recently reviewed and necessary changes made by that office to conform with federal EEO legislation.

- C. 4 "Tests and other selection techniques not validated as required by the OFCC Order on Employee Testing and other selection procedures."

No pre-employment testing is utilized for SPA personnel in connection with selection and referral procedures used by the Division of Personnel Services. In certain circumstances, applicants are requested to take the typing skills test administered by the local Employment Security Commission Office. These tests have been validated according to ESC officials.

- C. 5 "Referral ratio of minorities or women to the hiring supervisor or manager indicates a significantly higher percentage are being rejected as compared to non-minority and male applicants."

Records are not currently available indicating whether or not on referrals a significantly higher percentage of minorities or women are being rejected by the hiring supervisor or manager. Efforts are being made to accumulate this data in the months ahead.

- D. Analyze: "Transfer and promotion practices"

An analysis of lateral and/or vertical movement of minority or female employees does not indicate that such movement is occurring at a significantly lesser rate (compared to workforce mix) than that of non-minority or male employees. For example, an analysis of lateral and promotional transfer actions handled by the Division of Personnel Services from July, 1973 through October, 1973 (July, 1973 was initiation date for this type of record) revealed that minority employees received almost one-third of this activity while representing approximately one-fourth of the SPA workforce. Promotional transfer activity for minority employees exceeded one-third of all promotional activity for the period. This analysis would indicate that positive and affirmative efforts have been made on behalf of the minority SPA workforce.

G. Analyze: "Apprenticeship programs"

Five apprenticeship positions have been established in Physical Plant to enable SPA employees of that division to train for trade skill positions such as painters, bricklayers, carpenters, and plumbers.

H. Analyze: "All company training programs formal and informal"

Review of training programs, both formal and informal, does not indicate that minorities or women are significantly underrepresented.

1. Employees may take University courses (tuition free) to upgrade knowledges and skills.
2. Supervisory Development Training program is available to all supervisors.
3. High School Diploma program is available to eligible employees without regard to race or sex.
4. Orientation training sessions are attended by all new employees.

I. All personnel in the Division of Personnel Services involved in recruiting, screening, and referral of applicants to SPA positions in the various schools and departments have been carefully selected and trained to insure that equal opportunity for employment is given to all applicants. This means that Interviewers are carefully screened before employment as to their attitudes and personal opinions concerning employment of minority group members and females. After employment Interviewers are made fully aware of legislation, executive orders, and guidelines concerning equal employment opportunity. Awareness is accomplished through on-the-job training and workshops and seminars that are offered at various locations from time to time.

K. Several formal techniques have been established for evaluating the effectiveness of EEO programs pertaining to SPA employment. Among these techniques can be listed the:

1. EEO-1 annual report
2. Job Order Control Sheet (indicates job vacancies and how they are finally filled)
3. Application Routing Sheet (sent with all referrals, completed and returned to Personnel Services indicating reasons why applicant was or was not hired)
4. Records maintained on transfers.
5. Annual Affirmative Action report
6. Records on applicant responses to newspaper advertising and referral of weekly vacancy lists to selected recruiting sources.

Ag + LP

---

COMPONENTS OF AFFIRMATIVE ACTION PLAN: ORDER NUMBER 4

A. Analyze: "Composition of the workforce by minority group status and sex."

The composition of the School's workforce is presented in this Plan as follows: EPA Faculty by departments and a School summary; EPA Non-Faculty and SPA in School summaries. These are broken down by academic rank and job categories.

B. Analyze: "Composition of applicant flow by minority group status and sex."

For EPA the composition of the applicant flow by minority group status and sex is reported by means of an affirmative action recruitment report filed with the Dean of the School and the University Affirmative Action Officer each time a position is filled.

For SPA the applicant flow is handled by the University Personnel Office and a report is filed with that office each time a position is filled.

C. Analyze: "The total selection process including position descriptions, position titles, worker specifications, application forms, interview procedures, test administration, test validity, referral procedures, final selection process, and similar factors."

1. "The selection process eliminates a significantly higher percentage of minorities or women than nonminorities or men."

The Faculty Handbook published by the University sets forth in terms of education and experience the overall requirements for a position by rank. These and the exact duties of the position are advertised in the seeking of applicants. Final selection is made through a composite judgment of departmental faculty and administrative personnel, all of whom are acutely aware of the responsibility of the University to give consideration to minorities.

SPA are recruited through the University Personnel Office. Applicants are recruited and selected in accordance with the duties of each position. No standardized testing is required at either the department or school levels.

2. "Application and related pre-employment forms not in compliance with Federal legislation."

Application and related forms are handled at the University level.

3. "Position descriptions inaccurate in relation to actual functions and duties."

Description of faculty and EPA non-faculty positions are written in the departments based on the Faculty Handbook and specific duties of each position. Each description is reviewed by the appropriate Associate Dean(s) and the School Dean before forwarding to the Provost for approval to recruit. Therefore, the position descriptions are screened initially as to their accuracy. Position descriptions for all other jobs are carefully reviewed each time a position is to be filled to be sure that they correctly reflect the needs of the job and that the requirements are not inflated.

4. "Tests and other selection techniques not validated as required by the OFCC Order on Employee Testing and other Selection Procedures."

No special tests are given at the department or school levels.

5. "Referral ratio of minorities or women to the hiring supervisor or manager indicates a significantly higher percentage are being rejected as compared to nonminority and male applicants."

Reported by the University.

- D. Analyze: "Transfer and promotion practices."

The University administration has addressed these practices as it applies to SPA employees. For EPA employees every effort is being made so as not to favor one group over another.

- E. Analyze: "Facilities, company sponsored recreation and social events, and special programs such as educational assistance."

The School does not have company sponsored recreation and social events. The School does encourage and provide financial assistance for professional development on an individual basis without regard for sex, race or ethnic group.



F. Analyze: "Seniority practices and seniority provisions of union contracts."

No unions among EPA or SPA employees.

G. Analyze: "Apprenticeship programs."

No apprentice programs as such. However, some Research Technicians, who have the education but are short of the experience requirements of the job classification, are appointed as a Trainee at a reduced salary until meeting the experience requirement. University administration will elaborate on this authorized practice.

H. Analyze: "All company training programs, formal and informal."

There are no formal training programs. One example of informal training program are the provisions that employees may take one course per semester while working full time. The University administration will speak to this policy, which is applied without regard to race, sex or ethnic group.

I. Analyze: "Workforce attitude."

Each department has appointed an individual to nurture and enhance the aims and purpose of our Affirmative Action Plan. From the individuals the School maintains an Affirmative Action Committee that works with the Dean in the interest of Equal Employment Opportunities.

J. Analyze: "Technical phases of compliance, such as poster and notification to labor unions, retention of applications, notification to sub-contractors, etc."

1. "Posters not on display."

It is the responsibility of the individual identified in Section I to see that posters are appropriately displayed.

2. "Purchase orders do not contain EEO clause."

Handled by University administration.

3. "Labor unions and subcontractors not notified of their responsibilities."

Handled by University administration.

- K. In addition to the foregoing specific points which are treated correlatively in both section (a) and (b) of 60-2.23, the following miscellaneous "problems" are noted in 60-2.23(b) which, if they exist, should receive corrective attention:

1. "No formal techniques established for evaluating effectiveness of EEO programs."

The University will respond to this question.

2. "Lack of access to suitable housing inhibits recruitment efforts and employment of qualified minorities."

A central office of the University has this responsibility.

3. "Lack of suitable transportation (public or private) to the work place inhibits minority employment."

University administration will address this item.

- L. Various sections of the Revised Order No. 4, other than 60-2.23, and of the HEW Higher Education Guidelines treat "problem areas" which must be analyzed and which may require remedial action; they are treated here for purposes of comprehensive consideration of the total "self-analysis" exercise in which the institution must engage.

1. "Compliance of personnel policies and practices with the Sex Discrimination Guidelines of 41 CFR Part 60-20."

Responded to in the University Plan.

2. "In hiring decisions, assignment to a particular title or rank may be discriminatory. For example, in many institutions women are more often assigned initially to lower academic ranks than are men."

The University Plan will speak to this.

3. "Anti-nepotism policies."

See University Plan.

4. "Rights and Benefits-Salary"

Under University Plan.

11/15/73

Dr. Schlu,

These are the two memos which are pertinent to the HEW EEO report. After some discussion - in person and by phone - the "listed first" changed to a separate listing because that was so much easier to do with the existing program.

Barbara

NORTH CAROLINA STATE UNIVERSITY AT RALEIGH

OFFICE OF THE PROVOST

P. O. Box 5067, RALEIGH, N. C. 27607

27 October 1972

MEMORANDUM

TO: Barbara Byrd

FROM: Clauston Jenkins *g*

Enclosed is a list of administrators, stating where they should be placed in the EEO EPA data. At this time there is no need to include tenure status on the print-out. In addition a list is attached of "departments" which should be included under the school title, "Chancellor." The departments don't necessarily have to be in the order listed. I would like academic administrators and administration listed first so that they can be removed easily from the rest of the print-out.

Enclosure  
CLJ:es



ADMINISTRATORS

<u>NAME</u>	<u>Move from Department</u>	<u>New "Department"</u>
Littleton, I. T.	Library	Administration
Talley, B. C.	Student Affairs	Administration
Jones, E. W.	Continuing Education	Administration
Matrone, G.	Biochemistry	Academic Admin.
Toussaint, W. D.	Ag. Economics	Academic Admin.
Williamson, J. C.	Ag. Economics	Academic Admin.
Hassler, F. J.	BAE	Academic Admin.
Carperter, W. L.	Ag. Information	Academic Admin.
Porterfield, I. D.	ANS	Academic Admin.
Legates, J. E.	ANS	Academic Admin.
Noggle, G. R.	BO	Academic Admin.
Harvey, P. H.	CS	Academic Admin.
Knight, K. L.	Entomology	Academic Admin.
Roberts, W. M.	Food Science	Academic Admin.
Mann, T. J.	Genetics	Academic Admin.
Donoho, C. W.	Horticultural Sciences	Academic Admin.
Evans, J. B.	Microbiology	Academic Admin.
Apple, J. L.	PP	Academic Admin.
Ellis, D. E.	PP	Academic Admin.
Cook, R. E.	PO	Academic Admin.
Glazener, E. W.	PO	Academic Admin.
Mayo, S. C.	SOC	Academic Admin.
McCanto, C. B.	SSC	Academic Admin.
McCracken, R. J.	SSC	Academic Admin.
Davis, D. E.	ZO	Academic Admin.
Kamphoefner, H. L.	ARC	Academic Admin.
Coster, J. K.	AGE	Academic Admin.



ADMINISTRATORS (Page 2)

Scarborough, C. C.	AGE	Academic Admin.
Hanson, D. M.	ITE	Academic Admin.
Dolce, C. J.	Dean's Office	Academic Admin.
Smith, H. B., Jr.	CHE	Academic Admin.
Ferrell, J. K.	CHE	Academic Admin.
Dean, D. L.	CE	Academic Admin.
Fadum, R. E. 204106327	CE 4/28	Academic Admin.
Langfelder, L. J.	CE	Academic Admin.
Hoadley, G. B.	EE	Academic Admin.
McDonald, P. H.	EM	Academic Admin.
Canada, J. R.	IE	Academic Admin.
Anderson, C. A.	IE	Academic Admin.
Carson, R. G.	IE	Academic Admin.
Zorowski, C. F.	MAE	Academic Admin.
Austin, W. W., Jr.	MAT	Academic Admin.
Murray, R. L.	NE	Academic Admin.
Davey, C. B.	FOR	Academic Admin.
Saylor, L. C.	FOR	Academic Admin.
Goldstein, I. S.	WPS	Academic Admin.
Ellwood, E. L.	WPS	Academic Admin.
Hines, T. I.	RRA	Academic Admin.
Champion, L. S.	ENG.	Academic Admin.
Tilman, R. O.	PS	Academic Admin.
Hugus, Z. Z.	CH	Academic Admin.
Mason, D. D.	ST	Academic Admin.
Rose, M. J.	MA	Academic Admin.
Seagondollar, W. J.	PY	Academic Admin.
Menius, A. C.	PY	Academic Admin.

ADMINISTRATORS (Page 3)

Memory, J. D.	PY	Academic Admin.
Lewis, P. E.	CSC	Academic Admin.
Link, D. A.	CSC	Computer Center
Leith, C. J.	GY	Academic Admin.
Rutherford, H. A.	TxCh	Academic Admin.
Bogdan, J. F.	TxT	Academic Admin.
Hamby, D. S.	TxExt	Academic Admin.
Chaney, D. W.	Dean's Office	Academic Admin.
Boone, E. J.	ADE	Academic Admin.
Burt, M. P.	Ft. Bragg	Academic Admin.
Carnesale, A.	University Studies	Academic Admin.
Burns, R. P.	ARC	Academic Admin.
Wilkinson, R. R.	LAR	Academic Admin.
Foote, V. M.	PD	Academic Admin.
Hopke, W. F.	GPS	Academic Admin.
Miller, H. G.	PSY	Academic Admin.
Toole, W. B.	ENG	Academic Admin.
Seegers, L. W.	HI	Academic Admin.
Gonzalez, A. A.	MFL	Academic Admin.
Bryan, R. S.	PHI	Academic Admin.
Drews, F. R.	PE	Academic Admin.
Block, W. J.	PS	Academic Admin.
Hammond, R. H.	Fr. Engr.	Academic Admin.
Craig, H. B.	FS	Academic Admin.
Hyatt, G.	ANS	Administration
Caldwell, J. <sup>T</sup> <del>H</del>	Other Explain	Administration
Kelly, H. C.	Other Explain	Administration

*already updated*

Winstead, N. N.	Other Explain	Administration
Peterson, W. J.	Other Explain	Administration
Rigney, J. A.	Other Explain	Administration
Jenkins, C. L.	Other Explain	Administration
Simpson, W. H.	Other Explain	Administration
Pate, R.	Other Explain	Administration
Edwards, E. L.	Other Explain	Administration
Wood, R. N.	Other Explain	Administration
Harris, E. F.	Other Explain	Administration
Smith, R.	Other Explain	Administration
Younts, B. R.	Other Explain	Administration
Huffman, D. G.	Other Explain	Administration
<i>Littleton, J. J.</i>	<del>Library</del>	<del>Admin</del>
<i>Casey, W. R.</i>	<i>Athletics</i>	<i>Admin.</i>
<i>Varsley, George L.</i>	<i>Business Affairs</i>	<i>Admin</i>
<i>Wright, J. D.</i>	<i>Business Affairs</i>	<i>Admin.</i>
<i>Martin, L. B.</i>	<i>Computer Center</i>	<i>Admin</i>
<i>Jones, E. W.</i>	<i>Continuing Educ</i>	<i>Admin</i>
<i>Drossler, Earl G.</i>	<i>Research Adm.</i>	

NORTH CAROLINA STATE UNIVERSITY AT RALEIGH

P. O. Box 5067, RALEIGH, N. C. 27607

OFFICE OF THE PROVOST AND VICE-CHANCELLOR

November 20, 1972

To: Barbara Byrd  
From: Clauston Jenkins *CJ*  
Subject: Comments on Report 9622-11

I have gone through the report and found a few minor changes that need to be made. Most of these stem, I think, from coding or errors of omission on my part in giving you the individuals to be placed in the special administrative files. A list of these is attached. I do have one additional question, how were part-time personnel counted in determining averages?

In general the report appears to be satisfactory, although I was disappointed that after waiting for the report, the 9 and 12 month employees were not listed together and an equated 9 month salary for all was not included.

CJ/mg

Attachment

cc: Mary Strickland

*There may be other problems that I  
have not located. I have not checked  
every bit of data.*

12 Month Employees

Page 5

1. Under School Chancellor

Department Other

Move - Ballinger, Ac. Ed.  
Dane  
Ondriyek  
Pena

To - Education, Dean's Office page 41

*Coding incorrect in record  
Program modification required  
can do for next run*

Page 12

2. Place the department, Biochemistry, under School, ALS

Page 17

3. Move Blalock, T.C. from ANS to Ag. Extension, page 34

*Coding*

Page 27

4. Check marital status and race codes for all members of microbiology.

*Coding - not ACS responsible*

Page 39



5. Move Speece, H.E. from MS&ED to Academic Administration

*need SSN*

Page 46



6. Move Canada, John R. to Academic Administration

*need SSN - incorrect one given*

Page 33

7. Add "O" as race for Mathies, J.B.

*Coding - record incorrect*

9 Month Employees

Page 1

1. "other" should be University Studies and personnel on page 4 should be included here as well

*don't understand*

Page 5

2. Biochemistry should be included in School 1, ALS

*prog. mod*

Page 44

3. The Politics Department is out of alphabetical order -

*Sorted on codes - not words  
not practical, would require an additional program to change code a sort, and change in file list for this program*



9 Month Employees (continued)

Pages 46 - 51

4. The departments in PAMS, School 6, are not in alphabetical order

*Sorted on codes, not Alpha -*

Page 14

5. Add Jackson, Barry SS# 077-26-2634

*coding*

Finally in the summaries for 9 and 12 month employees, the grand total summaries are incorrectly labeled with school names:

Page 77 for 12 month

Page 61 for 9 month

*program error - corrected*

April 10, 1973

TO: Chancellor Caldwell  
FROM: Clauston Jenkins  
SUBJECT: Clarification of matters related to Affirmative Action

Dr. Kelly sent you two different items at once. The second item "Affirmative Action Plan for Additional Administrative Units" is the temporary title assigned to the plan developed to cover all the units on campus that were too small to generate a separate plan of their own and yet needed to be included in a plan for the University as a whole.

Dr. Carnesale coordinated the work among these 13 units and developed the plan which should not be confused with a plan for the administration. University Studies was included among this group because Dr. Carnesale did not want to become too closely identified with any School and feared he might if he were included with one for Affirmative Action purposes. The term research assistants and research associates in Table 1 refer to EPA positions, not graduate students. "Other" refers to EPA positions not included in the above titles.

The first item is a draft of a statement that was intended to help you formulate a statement related to University administrators. For purposes of Affirmative Action planning we pulled out Deans, Assistant Deans, Directors, Department Heads, Vice Chancellors, etc., and put them in a separate group totaling 96 individuals. We had two purposes: 1) to establish a workable group of administrators that could be discussed at one time 2) to reduce the average salary for white male faculty. The printout of those included is attached. Part of our problem in developing this list is that the computer lists individuals by rank rather than title. No doubt there are individuals who are mainly considered administrators who are not included in the 96 but that total does include all the key administrators on campus.

As I noted before the draft was really designed to serve as a starting point for you in developing your own statement of what our goals should be for changing the administration from a bastion of white male supremacy.

One final point. Since we have protested so long and vigorously that we have not discriminated in the case of Joesting, Mueller, and Bireline, we should maintain that position in our statement. Maybe we can plead guilty to "institutionalized discrimination."

CJ/mg  
Attachment

11

*North Bond*

NORTH CAROLINA STATE UNIVERSITY AT RALEIGH

OFFICE OF THE DEAN  
Box 5036 ZIP 27607

SCHOOL OF LIBERAL ARTS

December 11, 1973

MEMORANDUM

TO: Mr. William H. Simpson

FROM: Dean Robert O. Tilman *RT*

We have begun to receive a number of letters such as these requesting information on possible applicants from the ranks of women and minorities. Would it make sense for the School of Liberal Arts to broadcast some such letters about for purposes of satisfying HEW demands? I am not sure what the results of these letters might be, but at least it would help us to demonstrate our good faith.

Let me hear your reactions.

Enclosures

*PHD depts. only*



DEPARTMENT OF ENGLISH

BERKELEY, CALIFORNIA 94720

November 26, 1973

Professor Larry S. Champion  
Chairman  
Department of English  
University of North Carolina at Raleigh  
Raleigh, N.J. 27607

Dear Professor:

Concerned by the fact that blacks and other minorities play so small a part in academic life, the English department of the University of California at Berkeley appointed a committee to study the problems of minorities in the department and to search for applicants for our graduate program. I am writing as the chairperson of that committee to solicit applications from undergraduates at your school. We would like to urge any undergraduate with a strong academic record and with an interest in pursuing any advanced degree in English literature to apply to Berkeley. Although our committee is not empowered to admit students, we have been charged by the department to seek ways of increasing the number of minority students in our graduate program and to deal with difficulties minority students may encounter once they are enrolled. If any student has questions about graduate life at Berkeley, our committee would be delighted to answer them candidly. Interested students may obtain applications from the Graduate Office, Department of English, University of California, Berkeley, California 94720. Applications from students wishing to be considered for financial aid are due by March 1st. All questions regarding admissions should be directed to Paul Alpers, the chairman of the graduate program. The committee will gladly forward information about sources of financial aid outside the university to applying students.

Sincerely yours,

A handwritten signature in cursive script that reads "Carol T. Christ".

Carol T. Christ

UNIVERSITY OF CALIFORNIA, BERKELEY

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SANTA BARBARA • SANTA CRUZ

DEPARTMENT OF ENGLISH

BERKELEY, CALIFORNIA 94720

November 12, 1973

Professor Larry S. Champion  
Chairman  
Department of English  
North Carolina State University  
Raleigh, North Carolina 27607

Dear Professor Champion:

I am writing as the chairman of a search committee that is trying to locate a pool of minority applicants to be among those considered for a number of ladder positions, beginning and advanced, in the English Department of the University of California at Berkeley. It would be preferable if candidates could teach Afro-American Studies but not absolutely necessary. Our greatest academic needs are in American Literature, Contemporary British Literature, and Creative Writing. Do you know any finishing graduate student that would be an appropriate candidate or any advanced professor who might be interested in applying to Berkeley?

Sincerely yours,

*Carol T. Christ*

Carol T. Christ

so



*file with other  
minority letter  
Secretary to  
my later  
reference*



GEORGE MASON UNIVERSITY

November 21, 1973

Mr. Larry S. Champion  
Chairman, Department of English  
North Carolina State University  
Raleigh, North Carolina 27607

Dear Mr. Champion:

We are hoping to replace three members of our English Department faculty, beginning with the 1974-75 school year, and we are seeking applications from candidates whose academic qualifications are appropriate and who belong to racial or ethnic minorities.

Although we have been swamped with applications we have not received many from members of minority groups, and we are anxious to move toward a more representative faculty.

In qualifications, we are looking for candidates with the Ph.D. or at the A.B.D. level, probably for the Assistant Professor rank. We seek people who excel in their own fields and who are flexible enough to teach courses in other areas as well. We are looking for outstanding candidates in any field, but as our entry in the M.L.A. Job Information List notes, we do not need help in 16th, 17th, 18th, or 20th century English Literature or in Victorian poetry. We do need particular help in Black or Third World Literature. We offer six 200 level literature courses and two 100 level writing courses, and we ask all department members to show an interest in these courses.

On behalf of the Appointments Committee, I am writing to ask your help. Please refer this request to possible candidates; we would like to hear from them as soon as possible. While we plan to hold interviews at the M.L.A. convention in December, we are willing to make other arrangements.

Sincerely yours,

*Winifred G. Keaney*

Winifred G. Keaney  
Appointments Committee

WKG/ak

X Some appointments are by school - not by department

check to see if EPA Non-Faculty should be included in School or department report or are these going to be compiled separately.

why can't General Administration furnish availability data for each campus.

- need to be uniform in existence figures

Exclusions

does testing apply to EPA and SPA? Both <sup>primarily SPA</sup>

clarification of section F, p. 27

Time Period - June for EPA, Oct. for SPA (Both June)

Number of full-time -

Letter to Row. about.  
====

EEO-6 next year or continue with EEO-1 report.

Has not been finalized as yet.

What are we now.

U. S. DEPARTMENT OF LABOR  
BUREAU OF LABOR STATISTICS  
John Fitzgerald Kennedy Federal Building

November 1973  
Announcement #657-S

Boston, Massachusetts 02203  
Phone: 617-223-6761

PUBLICATIONS OF THE BUREAU OF LABOR STATISTICS  
SALE PUBLICATIONS LIST

## Characteristics of Agreements Covering 1,000 Workers or More July 1, 1972

*This bulletin is the third in a series presenting a wide array of data on major collective bargaining agreements, classified by identifying characteristics and substantive provisions.*

     / Bulletin 1784    Price: \$1.00

## EMPLOYMENT OF SCIENTISTS AND ENGINEERS 1950-70

*Comprehensive data on the employment of scientists and engineers from 1950 to 1970 and includes estimates of major scientific occupational group in all sectors of the economy. Also are presented estimates for those primarily engaged in research and development.*

     / Bulletin 1781    Price: \$1.25

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*Industry indexes of output per man-hour and output per employee for the industries currently included in the U. S. Government's productivity measurement program. Data cover the year 1939 and each year from 1947 to 1972. Indexes for steel foundries and ready-mix concrete industries are added for the first time.*

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Price: \$1.80

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### Life Insurance December 1971

     / Bulletin 1791  
Price: \$ .85

*Provides data on wages and related benefits for employees in home offices and regional head offices of the life insurance industry. Included are average weekly earnings for selected occupations by regions, occupational earnings for fourteen metropolitan areas, as well as establishment practices and supplementary wage provisions.*

TO ORDER: Please complete and return the form on the reverse side.

## ORDER FORM

NAME \_\_\_\_\_

STREET ADDRESS \_\_\_\_\_

CITY AND STATE \_\_\_\_\_ ZIP CODE \_\_\_\_\_

 Remittance enclosed for \$ \_\_\_\_\_ Make checks payable to Superintendent of Documents. Charge \$ \_\_\_\_\_ to my Deposit Account No. \_\_\_\_\_.

Please send:

\_\_\_\_\_ Bulletin 1784, Characteristics of Agreements @ \$1.00 each

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U.S. DEPARTMENT OF LABOR  
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OFFICIAL BUSINESS

Mr. Clouston L. Jenkins  
 North Carolina State Univ.  
 Provost's Office  
 201 Holladay Hall  
 Raleigh, N. C. 27607

566B

	WHITE						WHITE			BLACK		
	MALE			FEMALE			ESC Res %	SPD Boord %		ESC % Res. /o	SPD Boord %	
	ESC RES %	*SPD Boord %	**	ESC RES %	*SPD BO. %	**		*	**		*	**
OFFICIALS & MANAGERS	84	64.9	70	16	35.1	30	90	93.4	90	4	9.6	10
PROFESSIONALS	53		70	47		30	88		88	12		12
TECHNICIANS	82		75	18		25	95		90	5		10
SALES												
CLERICAL	27	12.2	20	73	87.7	80	92	89	85	8	11	15
CRASMAN		99.9%			.04			3.9			6.1	
OPERATIONS (semi skills)		↓			↓			↓			↓	
LABORERS		↓			↓			↓			↓	
SERVICE WORKERS		59.7			40.3			39.7			61.3	
<p>* Percentage figures reflect state government workers only.  ** Goals for office of general administration.  1971 Workplace Statistical DATA shows:  20% of labor non-white (7.8% non-white unemployment rate)  41% of labor female (5.6% female unemployment rate)</p>												



# Administrative Availability

EPA - Non Faculty

(Page 5)

Availability on Administration -	Availability				1976
	White	Female	Black		Goals
President & Chancellors	M	28	M	F	0
Academic Deans, Provost	-	109			2 - June white males
Assessors & Assistant Academic Deans	-	15			0
Financial and Adm. Offices		70			0

Official  
Memorandum

Page 22 - Number 2

check with Bill Calloway - SPA form

We do not have EIA Application

Page 25 - Number 5

Check with Bill Calloway -

Page 25 - D

Check with Bill Calloway.

EIA finally met - formal breakdown. Check with Mary -

Page 27 - G

H

Check with Bill Calloway

Page 28 - J-2

(Wilton Fleming)

J-3

Bill Calloway to check with Glenn Mason.

Check with John Wright. Need copy of J-2 and J-3.

Page 28 K-1

Program of how we evaluate effectiveness of EEO such as from a  
all appointments must be filled out before filling a position

Check with Bill Calloway.

K-2

Board Naylor Council

Before then will handle off campus rental at owner

must sign form that housing is open to all.

Code of Bel Rules for Housing.

Page 29 - 3

Comment on local bus schedule in <sup>Public</sup> Policy. Bus cover  
the city in residential areas and lines run adjacent to  
NCSU campuses. Check with school of design.  
Print report on bus system.

Page 30 - 1

- Attach policy on maternity leave.  
Check maternity leave policy (Recently on instruction)
1. Check with Clanton on this.
  2. Check with Clanton on this.
  3. Attach Board of Governor's Policy.

30-2. Need

30-3 - Bd of Gov Policy - anti-nepotism

Page 32

Clanton

<sup>Manual</sup>  
Page 31 - Salary Print Out  
Salary Analysis

Check on this  
Explanation of any difference.  
70 percent men and women.

Profile Analysis

update data  
on compensation  
from National and NC.

To Do

Bill Calloway - Write statement

Availability of SIA. Expand from what we have

See Appendix C / ~~to~~ on Aff Action Plan  
for model

January 10, 1974

MEMORANDUM

TO: Mr. Simpson

FROM: N. N. Winstead *N. N. Winstead*

RE: Your Memorandum of January 9, 1974

While we have a larger proportion of females at lower ranks than the proportion of men at lower ranks, I am convinced that we do not practice the assignment of women to lower academic ranks than men. In all cases, ranks are determined on the basis of educational background, other qualifications, and experience. While the proposal of rank for all individuals originates as a recommendation of the department head and school dean, we do review the suitability of the rank for each individual.

I don't know whether this is something that Dr. Gehle could survey or not. I suspect it would be extremely difficult to prove one way or the other from data. It would always be possible, I suppose, for an individual to disagree with my comment.

NNW/sbe

## Chapter V

D. Recruitment Procedures - SIA Personnel

• Negotiation Policy - SIA Personnel — Over the bar and involved  
elsewhere under negotiable class  
in 1  
VIII

E. Placement, Promotion, Salary, and Conditions of Work - SIA

F. Identification of Public Area - SIA



60-223 (a) 2  
B. Analyze: "Composition of applicant flow by minority group status and sex."

For personnel Exempt from the State Personnel Act (EPA), ~~the~~ composition of ~~the~~ applicant flow by minority group status and sex is reported by means of an affirmative action recruitment report filed with the University Equal Employment Opportunity Officer and the School Dean's office each time a position is filled. For personnel Subject to the State Personnel Act (SPA), the applicant flow is handled by the University Personnel Office and a report is filed with that office each time a position is filled. This manner of reporting on the number of applicants, race, and sex has only been in effect during the 1972-73 year.

In some of the technical schools such as Engineering, Design, Textiles, and Forest Resources, ~~there are few~~, if any, <sup>minority</sup> blacks or women <sup>apply</sup> faculty applicants due to their scarcity of availability in these fields. In the School of Liberal Arts, there were more applicants from minorities and females. For example, In English <sup>e</sup> ~~there were~~ approximately 600 white males and 200 white females <sup>during 1972-73</sup> who submitted applications ~~over the period of the year~~. In Philosophy and Religion 228 white males applied for faculty openings compared to 35 white females. Modern Languages was another example where approximately 50 percent of the applicants were females. In Physical Education ~~there were~~ 37 white male applicants, 18 white females, and one <sup>minority</sup> black male <sup>applied</sup> for ~~these~~ positions.

The School of Physical and Mathematical Sciences <sup>received</sup> had 259 white male applicants, 6 white female, and 1 <sup>minority</sup> black male <sup>applicant</sup> for four chemistry positions.

Mathematics had 3 assistant professor openings and received 360 white male applications to 16 white female.

In the School of Education there were 200 white male, 6 white females, and 1 <sup>minority</sup> ~~black~~ male applicants for an assistant professor position. In Guidance and Personnel Services, 34 white male applicants, 8 white females, and 1 <sup>minority</sup> ~~black~~ male applied for an assistant professor position.

The School of Agriculture and Life Sciences had a smattering of minority and female applicants for some of their departmental openings. Botany received 80 white male, 14 white female applicants, and 1 <sup>minority</sup> ~~black~~ male applicant for one assistant professor position. Zoology had 38 white male, two white female, and one <sup>minority</sup> ~~black~~ male applicants apply for an assistant professor position.

~~There were several blacks and/or females who were offered positions and rejected them. Then the position was accepted by a white male. Also there were several acceptances by both <sup>minority</sup> blacks and females of job offers.~~   
 ~~The position was accepted by a white male after its position offer was rejected by a minority group member.~~

where here?

In other University units such as the Library, Student Affairs, and University Extension, the number of minorities and/or women applications were representative of the availability for these various professional positions.

~~In Student Affairs a one-year appointment for a Musician-in-Residence was rejected by three <sup>minority</sup> black males prior to acceptance by a white male. Also in Student Affairs for a guidance counselor position, applications were received from 34 white males, 8 white females, and 1 <sup>minority</sup> ~~black~~ female.~~

The D. H. Hill Library for one position opening for a professional librarian had applications from 18 white males, 15 white females, and 4 <sup>minority</sup> ~~black~~

females. Another opening had 50 white males, 43 white females, and 1 ~~black~~ <sup>minority</sup> female apply.

University Extension, for example, had 3 white males, 11 white females, 2 ~~black~~ <sup>minority</sup> females, and 1 ~~black~~ <sup>minority</sup> male apply for an assistant director post.

✓ An analysis of applicant flow for SPA personnel indicates that minority group applications approximate the number of minority persons with the primary recruiting area for the University.

60-11-2 (1) 3 and 4, 5  
C. (1) "The selection process eliminates a significantly higher percentage of minorities or women than nonminorities or men."

A review of the North Carolina State University selection process does not indicate that it eliminates a significantly higher percentage of minorities or women than nonminorities or men. ~~Comments~~ <sup>C</sup> Comments on this topic by the various reporting units confirm the above statement.

The School of Engineering indicates that job descriptions do not reflect a bias of any type, and ~~they have been reviewed~~ <sup>the descriptions are carefully reviewed to make certain that they</sup> to include only those criteria necessary for the performance of the job.

In the School of Agriculture and Life Sciences the requirements and the exact duties <sup>of</sup> ~~for~~ faculty positions are advertised in the seeking of applicants. <sup>described in all material used to solicit applications</sup> Final ~~selection~~ <sup>selection of faculty candidates</sup> is made through a composite judgment of departmental faculty and administrative personnel (department heads, school dean), all of whom are acutely aware of the responsibility of the University to give consideration to minorities and women.

*One of the smaller schools, Design, feels the selection process <sup>is not a</sup> discriminatory act. The difficulty rests in not having available a large pool of minorities and women from which to recruit.*

*In the School of Forest Resources, information on minority status frequently is not available or known during the initial screening of applicants (especially faculty), so discrimination at that stage is not likely. Later <sup>through formal intake work</sup> interviews, ~~exercises~~, tests (typing for clerks as an example and seminars for faculty) are conducted and evaluated openly and in such a manner as to eliminate discrimination.*

*One of the smaller schools*

*Handled in 1/24/68*

9.

6. (2) "Application and related pre-employment forms not in compliance with Federal legislation."

The application forms used by North Carolina State University for recruiting STA employees are supplied by the Central Office of State Personnel. These forms were recently reviewed and necessary changes made by that office to conform with Federal EEO legislation.

The University does not have application forms or pre-employment forms for faculty applicants. A prospective faculty member sends his or her résumé initially. University forms are not completed until the <sup>candidate</sup> applicant

*Blindly reviewed* → (~~has been offered~~ <sup>to</sup> and accepted the position.

60-2.23 (S) 3 and (S) 5

~~C.~~ (3) "Position descriptions inaccurate in relation to actual functions and duties."

*(make as as possible)*  
~~The~~ University position descriptions are accurate, <sup>in relation to the</sup> actual functions and duties. The criteria for the various academic ranks <sup>are described</sup> ~~are spelled out~~ in the Faculty Handbook (see following pages). The <sup>School of Agriculture and</sup> ~~School of Agriculture and~~ University units <sup>is</sup> all indicated that their position descriptions <sup>is</sup> reviewed by the appropriate associate dean and dean before forwarding to the Provost for approval to recruit. Therefore, position descriptions are screened initially as to their accuracy.

~~Qualifications for Subject to Personnel Act (SPA) position classifications are specified by the Central Office of State Personnel.~~ The School of Engineering, as an example, stated that position descriptions for all SPA jobs are carefully reviewed each time a position is to be filled to be sure that they correctly reflect the needs of the job and that the requirements are not inflated.

Position descriptions for SPA (Subject to State Personnel Act) positions are reviewed by the University Personnel Office and the Central Office of State Personnel for accuracy to assure that written descriptions reflect actual assigned duties and responsibilities. Qualification standards for each class of work are established by the Office of State Personnel and reflect the specific minimum training and experience needed to perform work in a given class.



60-2.23 (a) 3 and (b) 8

C. (5) "Referral ratio of minorities or women to the hiring supervisor or manager indicates a significantly higher percentage are being rejected as compared to non-minority and male applicants."

Records ~~are~~ <sup>do not</sup> currently available <sup>to</sup> indicate whether ~~there are~~ <sup>minority and female referrals for SPA pos.</sup> ~~referrals~~ a significantly higher percentage of ~~minorities and women~~ <sup>which are</sup> ~~are~~ being rejected by the hiring supervisor or manager. However, effective January 1, 1974, a procedure for maintaining cumulative data on applicant traffic by race, sex and EEO classification was implemented. Prior to January 1, this data had been recorded on the applicant register but had not been maintained on a cumulative basis.

C. (4) "Tests and other selection techniques not validated as required by the OFCC Order on Employee Testing and other Selection Procedures."

*As a general rule,*

No pre-employment testing is utilized for Subject ~~or~~ to Personnel Act (SPA) personnel in connection with selection and referral procedures used by the University Division of Personnel Services. In certain circumstances, applicants are shorthand and requested to take the/typing skills tests administered by the local Employment Security ~~Office~~. These tests have been validated according to the Employment

~~XXXXXX~~ Security Commission <sup>office</sup> officials.

*as required by the OFCC Order on Employee Testing and other Selection Procedures,*

In some of the University units simple performance ~~tests~~

*and* job-related tests are used for SPA prospective employees. Such tests might consist of recording and typing a typical letter in the case of clerical personnel; *used in the particular unit to which the prospective employee has made application*

There are no tests per se for faculty, although, in some schools and departments all applicants interviewed on campus may be asked to present a seminar to the selection committee and/or faculty members of the department.

60-2,22 (A) 3 and (A) 6

### Test Validation

*As noted above,* The Division of Personnel Services ~~as a general rule~~ does not test applicants for employment. At certain times (e.g. Typists and Stenographers who have been out of the workforce for a long period of time) may be requested to take the Clerical Skills Test administered by the local Employment Security Commission Office. These tests have been validated according to ESC officials. Skills tests may be given <sup>to SPA employees</sup> at times by various departments on campus; however, to the best of knowledge, these tests are directly related to the particular job to be performed.

D. Analyze: "Transfer and promotion practices."

An analysis of lateral and/or vertical movement of minority or female employees does not indicate that such movement is occurring at significantly lesser rates (compared to workforce mix) than that of nonminority or male employees. <sup>but to the contrary.</sup> For example, an analysis of lateral and promotional transfer actions handled by the Division of Personnel Services from July, 1973, through October, 1973, (July, 1973, was initiation date for this type of record) revealed that minority employees received almost one-third of this activity while representing approximately one-fourth of the SPA workforce. Promotional transfer activity for minority employees exceeded one-third of all promotional activity for the period. This analysis would indicate that positive and affirmative efforts have been made on behalf of the minority SPA workforce.

Generally for faculty members, ~~there are~~ <sup>occur</sup> no transfers from one School to another. Promotions are based on established criteria such as teaching performance, scholarly productivity, and other contributions to the profession and the University. <sup>Answers of its affirmative action program by department and then</sup> Race and sex are not a factor in such promotion decisions. *but school the national 201*

~~E. Analyze:~~ "Facilities, company sponsored recreation and social events, and special programs such as educational assistance."

All University units report that facilities, departmental and/or <sup>and main programs such as educational assistance</sup> School functions such as recreational and social events are open to all employees without regard to race or sex.

The D. H. Hill Library indicates that the Library Staff Association is the agency through which nearly all social functions are planned. Women and minorities belong to this association, hold office, and serve on planning committees. Social events quite often include the families of employees, and they are well attended by both sexes and minorities.

The University has an off-campus scholarly assignment program for faculty. On the recommendation of a department head and with the approval of the ~~School Dean~~, the Provost, the Chancellor, and the Board of Trustees, a faculty member may be granted an "off-campus scholarly assignment" for one semester at full salary or for one academic year at half salary.

All full-time employees with the supervisor's consent are allowed to take one course a semester at the University for a nominal fee of \$7.00.

Educational assistance in the form of Adult Basic Education classes for employees with less than an eighth-grade education has been provided at no cost during normal work hours for all employees.

So? —

All University Unit report ~~that there is~~ no evidence of exclusion of minorities or females and no problem seems to exist.

5. (1) "Minorities or women are excluded from or are not participating in company sponsored activities or programs."

All University minorities and women are included in and do participate in departmental, School, and University-sponsored activities and programs. ↩

*(as an example)*

The School of Design reported that one female faculty member was given special funding last summer to attend a computer workshop at M. I. T. The <sup>three</sup>women and one <sup>graduate</sup>black faculty member have also had available to them travel funds to aid their education on an equal basis to other faculty.

60-2.23(a) 5 and 10

E. (2) "De facto segregation still exists at some facilities."

There is no evidence that de facto segregation ~~do~~ exist<sup>s</sup> at any  
University facilities.



60-2.23(a) 6/2/51

F. Analyze: "Seniority practices and seniority provision contracts."

North Carolina State University does not have seniority practices and seniority provisions of union contracts, <sup>H</sup> ~~since~~ <sup>"</sup> There are no labor unions on ~~the~~ campus. However, the policy of the State Personnel Act which applies to SPA employees has six advancement steps for each job classification. The first three steps are automatic salary increases, usually given at the end of each year of employment. Steps four to six are based on merit and since each unit only receives two-thirds the amount for eligible ~~employees receive~~ merit increases each year, not all eligible employees receive merit increases. There is no indication that any discrimination exists on the basis of sex or race. All SPA employees are eligible for longevity pay after 15 years service with an automatic increase every five-year period thereafter.

All salary increases among EPA employees are <sup>administered</sup> ~~based solely~~ on merit and ~~once again~~ we do not find any indication that discrimination now exists on the basis of sex or race.

Initial appointments of faculty at the rank of instructor, assistant professor, and associate professor are provisional appointments of one, three, or five years respectively. Initial appointments ~~include~~ include experience and evaluation of educational background, performance, and other qualifications in determining initial rank <sup>and salary.</sup>

*W.D.?*

H. Analyze: "All company training programs, formal and informal."

Review of training programs, both formal and informal does not indicate that minorities or women are ~~significantly~~ underrepresented.

- (1) Employees may take University courses (tuition free) to upgrade knowledge and skills.
- (2) Supervisory Development Training program is available to all supervisors.
- (3) High School Diploma program is available to eligible employees without regard to race or sex.
- (4) Orientation training sessions are attended by all new employees.

✓ What is "significantly" ?  
✓ Are they in fact underrepresented?

~~X~~ Analysis: "Workforce attitude."

The various University units have indicated that the workforce attitude has generally been positive in the support of affirmative action and equal employment opportunities. All units have <sup>an</sup> affirmative action offices<sup>n</sup> and/or affirmative action committees and in most cases the individual departments within the units have their own affirmative action programs.

All personnel in the Division of Personnel Services involved in recruiting, screening, and referral of applicants to SPA positions in the various Schools and departments have been carefully selected and trained to insure that equal opportunity for employment is given to all applicants. This means that interviewers are carefully screened before employment as to their attitudes and personal opinions concerning employment of minority group members and females. After employment, interviewers are made fully aware of legislation, executive orders, and guidelines concerning equal employment opportunity. Awareness is accomplished through on-the-job training and workshops and seminars that are offered at various locations from time to time.

The academic Schools are working regularly on helping their workforce attitude. For example, in the School of Agriculture and Life Sciences each department has appointed an individual to nurture and enhance the ~~plan~~ and purposes of our Affirmative Action Plan. From ~~the~~ <sup>these</sup> individuals the School maintains an Affirmative Action Committee that works with the Dean in the interest of equal employment opportunities. Similar <sup>programs which are concerned with</sup> ~~such statements can be said about~~ the organization of affirmative action programs in the other seven Schools.

The units also <sup>affirm</sup> ~~state~~ that personnel involved in ~~their~~ recruiting, screening, selection, promotion, disciplinary, and related processes have been carefully selected and trained to help insure elimination of bias in all personnel actions.

Workforce attitude toward affirmative action is <sup>being tried</sup> ~~being tried~~ on a grass roots level from the smallest <sup>to the largest</sup> departments ~~onward~~ <sup>it is hoped</sup> ~~that a~~ <sup>that a</sup> positive attitude toward equal opportunities and employment will permeate ~~throughout~~ the University.

"No formal techniques established for evaluating effectiveness of EEO programs."

There are two basic levels of responsibility for implementing North Carolina State University's Affirmative Action Plan. At the broadest level, the responsibility rests on the central administration and has been delegated to the Equal Employment Opportunity Officer (EEO Officer). The responsibilities of the University EEO Officer may be found in Chapter IV, Sections (a) and (b).

*The second*  
~~Another~~ level exists at the ~~unit~~ unit level. Each unit's method of implementation and delegation of authority and responsibility is ~~outlined~~ *decided* in each unit's plan.

*The*  
Each unit's EEO Officers (total of 13) make up the University Affirmative Action Committee with the University EEO Officer serving as chairman. This committee has met periodically during the current school year and will continue to do so in the future. In turn, the unit EEO Officers meet *with and* disseminate information to their individual *departmental affirmative action* ~~department~~ representatives.

*instruments*  
Several formal techniques have been established for evaluating the effectiveness of EEO programs at this University. Among these *instruments* ~~techniques~~ can be listed the following:

EPA (Exempt from Personnel Act)

- (1) unit employment profile
- (2) recruitment reports from units of all prospective hires through the year
- (3) salary increase analysis
- (4) promotion review

*Subject State*  
SPA (Exempt to Personnel Act)

- (1) EEO-1 annual report

- (2) Job Order Control Sheet (indicates job vacancies and how they are finally filled)
- (3) Application Routing Sheet (sent with all referrals, completed and returned to Personnel Services indicating reasons why applicant was or was not hired)
- (4) records maintained on transfers
- (5) records on applicant responses to newspaper advertising and referral of weekly vacancy list to selected recruiting sources.

An annual affirmative action report from each unit will include the following:

- progress in meeting goals and assessment
- review of changes in employment profile
- review in analysis of availability
- plans for changes in procedure and goals for the next year.



~~(2)~~ "Lack of access to suitable housing inhibits recruitment efforts and employment of qualified minorities."

Low income housing is in short supply and is much needed in the City of Raleigh at this time. The University through the Department of Urban Affairs in University Extension works regularly with city officials on this problem. ~~to~~

*The City of Raleigh has*  
~~creation of~~ city is a Raleigh Community Relations Council. One focus of this

Committee is ~~for~~ *directs toward* the establishment of a non-profit housing corporation which could purchase property, redevelop it, and make it available to new tenants on a possible subsidized renting basis. This ~~involves~~ *effort* involves several faculty members. ~~participates~~ *participates*

A member of our faculty and staff ~~participates~~ in HOME (Housing Opportunities Made Equal). The purpose of this organization is to help prepare neighborhoods for integration that is about to ~~occur~~ *take place*.

Goals for Raleigh, still another organization, through its Housing subcommittee, is studying strategy for dealing with housing problems in Raleigh.

*Rewrite*

*The City of Raleigh and its Housing sub-committee had*  
The subcommittee had contact through the City of Raleigh with faculty members

to do a housing submarket analysis. The project ~~was~~ *planned* to look at housing demands and problems and then ~~project~~ *project* housing needs over the next five, ten, and fifteen years. This study has ~~now~~ *recently* been completed.

A new organization, ~~with~~ *ULTRA, which involves* a number of faculty and staff involved in it, to

ULTRA which deals with landlord-tenant relationships. ~~A~~ *of ULTRA* current project is to

~~have introduced~~ *the preparation of* legislation ~~improving~~ *to strengthen* the rights of tenants, ~~in this relationship.~~

K. (3) "Lack of suitable transportation [public or private] to the work place inhibits minority employment."

Public transportation in the City of Raleigh is grossly inadequate at the present time and is in need of much improvement. This inadequate service is particularly true in various minority areas <sup>of the city</sup> and could inhibit their means <sup>prevent these citizens</sup> of getting to the University. ~~that~~ <sup>and from employment with the</sup> ~~the~~ <sup>located in the</sup> ~~vehicles~~ <sup>are</sup> ~~are~~ <sup>formidably</sup>

The University through its Department of Urban Affairs in University Extension <sup>DW</sup> has cooperated with the City of Raleigh ~~XXXX~~ in efforts to improve public transportation.

<sup>a</sup> In 1973 <sup>(see Voohees study)</sup> a Public Transit Study was made, entitled the Voohees Study. A number of faculty served as consultants on this study. The <sup>results of that study</sup> study has just been <sup>are now available and have</sup> published and ~~it~~ <sup>has</sup> been endorsed by city officials. At the present time an application is being prepared to request federal funding for improvement of the transportation system. One recommendation <sup>is</sup> of the study ~~was~~ to set up a Transportation Authority for Raleigh. ~~Full~~ <sup>Implementation</sup> of this project ~~will~~ <sup>would</sup> greatly enhance public transportation in the south side of the City where many minority <sup>citizens</sup> people live. <sup>if fully implemented,</sup> the plan ~~when~~ <sup>the</sup> fully implemented <sup>would</sup> should double services in the City and improve <sup>the</sup> quality and quantity of buses.

The Goals for Raleigh organization through its Transportation Committee is also studying the Voohees Study and any possible short term improvements in public transportation that may be accomplished in the near future. ~~There are~~ <sup>There are</sup> numerous faculty members participating in the program.

Approximately two years ago several faculty members conducted, through <sup>the</sup> <sup>University</sup> Urban Affairs, <sup>Reports</sup> with the City of Raleigh a study of needs of the elderly and how their transportation needs <sup>might</sup> ~~may~~ best be met. A lack of funds has <sup>placed</sup> ~~put~~ this study in limbo at the present time.

The University through Urban Affairs is cooperating with Wake County officials and the City of Raleigh on a proposal for a Wake County study of residents the in/county who are transportation poor. This study involves our University ~~personnel~~ and ~~people~~ county agencies such as Social Services and Health, <sup>North Carolina</sup> A&T State University, a predominately black institution, is serving in a consultative capacity in this project.

60-2.23 (a) 10 and 11

~~(3)~~ "Labor unions and subcontractors not notified of their responsibilities."

North Carolina State University <sup>has no</sup> ~~does not~~ <sup>contracts,</sup> have labor unions. All  
construction contracts involving Federal funds (let by the University) <sup>include</sup> ~~have a~~  
<sup>(with)</sup> compliance statement, ~~or being~~ (an equal opportunity employer). When the con-  
tractor signs the contract, he is indicating that he is in compliance with  
this policy.

The signature of the contractor on  
the contract indicates that he has complied  
with equal employment policies.

60-2.23(a) 10 and 4/18

~~\_\_\_\_\_~~ "Purchase orders do not contain EEO clause."

~~A~~ The University purchase orders do contain the equal employment opportunity clause, and ~~A~~ a sample copy is attached below.

SHIP TO

1019

60-2.23 (a) 10 and (b) 19

~~7-~~ (1) "Posters not on display."

All University units indicate that appropriate equal employment opportunity posters are ~~appropriately~~ <sup>displayed in conspicuous areas accessible to</sup> displayed on their ~~various~~ <sup>several</sup> bulletin boards.

*all employees.*



60-2.13 Additional request independent of affirmative action program  
W 60-2.13 (A)

1. (1) "Compliance of personnel policies and practices with the Sex  
Discrimination Guidelines of 41 CFR Part 60-20."

It is felt that North Carolina State University's policies are consistent with  
the requirements on sex discrimination as stated in the Sex Discrimination  
Guidelines of 41 CFR Part 60-20.

- (2) to bring decision ---
- (3) Anti-Nepotism ---
- (4) Rights and Benefit Handling.

*has a number  
previous page no. 100000*  
(2) (1) "In hiring decisions, assignment to a particular title or rank may be discriminatory. For example, in many institutions women are more often assigned initially to lower academic ranks than are men."

Currently <sup>the</sup> this University has a larger proportion of female faculty members at lower ranks than the proportion of men, but we do not practice the assignment of women to lower academic ranks than men. In all cases, ranks <sup>are</sup> determined on the basis of educational background, other qualifications, and experience. *including quality of the experience, essential minimum* Each academic rank has certain criteria which must be met in *general assignment of rank, as well as availability of salary funds* order to be considered for a position. Although the proposal of rank for ~~an~~ *any* individual originates as a recommendation of the department head and School Dean, the Provost and Vice Chancellor, who is the chief academic officer in the University, reviews each recommendation as to the qualifications of the individual to that particular rank.

A major reason for a large proportion of women faculty members at lower ranks is that more of these appointments have been made in recent years.

(2)

(3)

"Anti-nepotism policies."

*in my opinion*

Attached is The University of North Carolina Board of Governors' stated policy on nepotism as well as the State of North Carolina nepotism policy.

*change*

Campus implementation of the anti-nepotism policy. ~~The inherent responsibility~~ rests with the Deans, directors, and department heads to exercise common sense and prudence in avoiding complications which may arise from employing relatives in situations where their relationship could produce favoritism, discrimination, or other disrupting phenomena. The Chancellor appointed the Associate Provost to review for the University administration the Dean's (or other unit head's) justification in each case of the prospective EPA appointment of a relative in advance of the appointment (1) to insure that we avoid the possibility of favoritism based on family relationship and (2) to insure that the decisions concerning employment are based on consideration of individual merit, and (3) to enable us to maintain data as required.

With respect to University employees who are subject to the State Personnel Act (SPA), applicable restrictions concerning the concurrent service of related persons ~~shall~~ <sup>OK</sup> be those adopted by the State Personnel Board.

The Chancellor reports annually to the Board of Trustees, at the regular meeting falling closest to the date of commencement, concerning all specific cases during the preceding year in which the terms of this policy were applied.

(3)

D. ~~(4)~~ "Rights and Benefits-Salary."

The analysis <sup>presented</sup> ~~is~~ <sup>conducted</sup> by the Division of Student Affairs on rights and benefits - salary adequately summarizes the other units' appraisal of these points. <sup>The analysis</sup> ~~it~~ states that for EPA and SPA positions, ~~the analysis of compensation patterns indicates~~ that differentials between men and women doing the same work is the result of differentials in longevity and/or judged performance between individuals and is not <sup>determined</sup> ~~determined~~ on the basis of race or sex.

Several years ago it became evident that some female faculty members' salaries were lower than many males at the same faculty rank and experience <sup>with</sup> the same department. Additional funds were made available to the various schools to <sup>remedy individual irregularities</sup> ~~improve~~ such situations where they existed. Each year department heads and Deans are reminded to check for any such situations and give <sup>such</sup> ~~particular~~ cases special attention. Where such differentials exist, <sup>the administrator</sup> ~~they~~ are required <sup>to</sup> ~~to be able to justify any such salary discrepancy~~ on the basis of performance.

NCSU AFFIRMATIVE ACTION RECRUITMENT REPORT  
(Fill out for each EPA position filled)

Department of: \_\_\_\_\_

EPA position filled: \_\_\_\_\_  
(rank and area of specialization if appropriate)

Fulltime \_\_\_\_\_; Part time \_\_\_\_\_; Date employment effective \_\_\_\_\_

Number of groups, institutions, etc. notified about vacancy: \_\_\_\_\_  
(list on back specific efforts to locate females and minorities)

Number of applications received:

Male	Female	
		Black
		White
		Other

Number of candidates invited to campus:

Male	Female	
		Black
		White
		Other

Offers made to (list in order):

	Name	Sex	Race	Present Employer	Accepted	Rejected
1.	_____	_____	_____	_____	_____	_____
2.	_____	_____	_____	_____	_____	_____
3.	_____	_____	_____	_____	_____	_____
4.	_____	_____	_____	_____	_____	_____

Do you have files documenting your efforts to take affirmative action to locate female and minority candidates for this position?                
Yes No

Can you provide an explanation for the offers made by explicitly comparing the qualifications of those offered the position with those not offered the position?                
Yes No

Signed \_\_\_\_\_ Date \_\_\_\_\_  
Department Head

NCSU HEADCOUNT ENROLLMENT SPRING '73 AND '74

	Spring 1973	Spring 1974 Total	1974 Black	1973 - 74 Percentage change	Black as % of '74 total
<b>AGRICULTURE &amp; LIFE SCIENCES</b>					
Undergraduate	1857	2167	30	+ 16.7	1.4
Graduate	520	533	10	+ 2.5	1.9
Total	2377	2700	40	+ 13.6	1.5
<b>DESIGN</b>					
Undergraduate	457	426	7	- 6.8	1.6
Graduate	94	115	1	+ 22.3	0.9
Total	551	541	8	- 1.8	1.5
<b>EDUCATION</b>					
Undergraduate	659	574	26	- 12.9	4.5
Graduate	432	437	22	+ 1.2	5.0
Total	1091	1011	48	- 7.3	4.7
<b>ENGINEERING</b>					
Undergraduate	2450	2422	39	- 1.1	1.6
Professional	10	17	0	+ 70.0	0
Graduate	362	322	4	- 11.0	1.2
Total	2822	2761	43	- 2.2	1.6
<b>FOREST RESOURCES</b>					
Undergraduate	774	788	7	+ 1.8	0.9
Graduate	62	57	1	- 8.1	1.8
Total	836	845	8	+ 1.1	0.9
<b>LIBERAL ARTS</b>					
Undergraduate	2545	2924	88	+ 14.9	3.0
Graduate	194	200	5	+ 3.1	2.5
Total	2739	3124	93	+ 14.1	3.0
<b>PHYSICAL &amp; MATHEMATICAL SCIENCES</b>					
Undergraduate	950	909	32	- 4.3	3.5
Graduate	216	226	8	+ 4.6	3.5
Total	1166	1135	40	- 2.7	3.5
<b>TEXTILES</b>					
Undergraduate	579	608	20	+ 5.0	3.3
Graduate	58	61	2	+ 5.2	3.3
Total	637	669	22	+ 5.0	3.3
<b>INTERINSTITUTIONAL</b>					
AG. INSTITUTE	111	139	9	+ 25.2	6.5
OTHER GRADUATES	227	217	5	- 4.4	2.3
	272	305	24	+ 12.1	7.9
<b>TOTAL</b>					
Undergraduate	10,609	11,174	263	+ 4.5	2.4
Professional	10	17	0	+ 70.0	0.0
Graduate	2,220	2,256	77	+ 1.6	3.4
TOTAL	12,829	13,447	340	+ 4.8	2.5



UNDERGRADUATE APPLICATION STATUS AS OF FEB. 5, 1974

	February 1973		February 1974		Percentage change	
	TOTAL	ACCEPTED	TOTAL	ACCEPTED	TOTAL	ACCEPTED
New Freshmen						
Male	3070	2155	3504	1984	+ 14.1	- 7.9
Female	1029	752	1340	853	+ 30.2	+ 13.4
In-state	3326	2504	3975	2514	+ 19.5	+ 0.4
Out-state	773	403	869	323	+ 12.4	- 19.9
TOTAL	4099	2907	4844	2837	+ 18.2	- 2.4
Transfer						
Male	366	141	411	96	+ 12.3	- 31.9
Female	172	85	229	77	+ 33.1	- 9.4
In-state	418	196	504	147	+ 20.6	- 25.0
Out-state	120	30	136	26	+ 13.3	- 13.3
TOTAL	538	226	640	173	+ 19.0	- 23.5
Total						
Male	3436	2296	3915	2080	+ 13.9	- 9.4
Female	1201	837	1569	930	+ 30.6	+ 11.1
In-state	3744	2700	4479	2661	+ 19.6	- 1.4
Out-state	893	433	1005	349	+ 12.5	- 19.4
TOTAL	4637	3133	5484	3010	+ 18.3	- 3.9

## BLACK APPLICATION STATUS AS OF JAN. 26, 1974

	Accepted	Denied	Pending	Total
<b>AGRICULTURE &amp; LIFE SCIENCES</b>				
BLS	2	3	2	7
SWB	1	-	-	1
SDM	3	2	5	10
S	1	1	1	3
A	1	1	1	3
SZO	3	1	2	6
SBE	-	-	1	1
SZM	3	-	1	4
SPV	1	-	-	1
SAS	-	$\frac{1}{8}$	-	$\frac{1}{8}$
	<u>14</u>	<u>8</u>	<u>18</u>	<u>35</u>
<b>DESIGN</b>				
EDA	-	4	3	7
EDF	-	-	$\frac{1}{4}$	$\frac{1}{4}$
	-	$\frac{4}{4}$	$\frac{4}{4}$	$\frac{8}{8}$
<b>EDUCATION</b>				
PSY	$\frac{1}{1}$	$\frac{1}{1}$	$\frac{4}{4}$	$\frac{6}{6}$
<b>ENGINEERING</b>				
E	16	1	15	32
ME	1	-	2	3
CE	-	-	1	1
EE	6	1	1	8
IE	-	-	1	1
NE	-	-	1	1
CHE	1	-	1	2
AE	$\frac{1}{25}$	-	$\frac{1}{25}$	$\frac{2}{50}$
	<u>25</u>	<u>2</u>	<u>25</u>	<u>50</u>
<b>FOREST RESOURCES</b>				
RPA	1	-	-	1
FOR	1	-	2	3
PPT	-	-	3	3
	<u>2</u>	<u>-</u>	<u>5</u>	<u>7</u>
<b>LIBERAL ARTS</b>				
LUS	5	2	2	9
LUE	7	1	12	20
LUP	5	-	8	13
LA	6	1	1	8
LUH	1	-	1	2
LUA	1	-	-	1
LAS	-	$\frac{1}{5}$	-	$\frac{1}{5}$
	<u>25</u>	<u>5</u>	<u>24</u>	<u>54</u>
<b>PHYSICAL &amp; MATHEMATICAL SCIENCES</b>				
CSC	9	-	4	13
PMS	2	-	-	2
CH	3	-	-	3
ST	1	-	-	1
MA	6	3	2	11
PY	-	-	$\frac{1}{7}$	$\frac{1}{7}$
	<u>21</u>	<u>3</u>	<u>7</u>	<u>31</u>
<b>TEXTILES</b>				
TXT	3	1	1	5
TC	$\frac{2}{6}$	-	-	$\frac{2}{6}$
	<u>6</u>	<u>1</u>	<u>1</u>	<u>8</u>
Ag. INSTITUTE	1	-	2	3
No School	-	-	22	22
UNIVERSITY TOTAL (Jan. 26, 74)	94	24	105	223
UNIVERSITY TOTAL (Feb. 15, 73)	60	19	50	129
UNIVERSITY TOTAL (July 27, 73)	127	57	36	232

(12 applications  
withdrawn)

NORTH CAROLINA STATE UNIVERSITY AT RALEIGH

P. O. Box 5067, RALEIGH, N. C. 27607

OFFICE OF THE PROVOST AND VICE-CHANCELLOR

May 20, 1975

*W*

MEMORANDUM

TO: N. N. Winstead, Provost

FROM: Lawrence M. Clark, Assistant Provost *LMC*

SUBJECT: Title IX

*W*  
*W*  
*M*  
*W*  
*W*

Dean Solomon has reviewed the proposed revised guidelines for Title IX which appeared in the Chronicle of Higher Education. His comments are attached. In addition, attached is a letter from Vice-Chancellor Talley.

This item will be discussed at the next Affirmative Action Officers meeting on May 29, 1975.



*Memphis Bend*  
 25% COTTON FIBER

NORTH CAROLINA STATE UNIVERSITY AT RALEIGH

DIVISION OF STUDENT AFFAIRS

OFFICE OF THE VICE CHANCELLOR  
101 HOLLADAY HALL  
RALEIGH, N. C. 27607

May 14, 1975

MEMORANDUM

TO: Dr. Lawrence M. Clark  
FROM: Banks C. Talley, Jr., Vice Chancellor  
RE: Title IX

*Banks C. Talley, Jr.*

Attached is a copy of Dean Solomon's memo to me of May 12 on the above subject.

We have reviewed this memo with Dean Solomon in our Staff Meeting this morning, and the individual department heads will follow up on this general discussion by having a specific meeting with Mr. Solomon on the Title IX implications for their areas. They will then take steps to comply with Title IX as is now pending before the President for his approval. We will be alert for Presidential approval to see if there are any changes then!

BCT:ul  
Attachment

cc: Dean Donald H. Solomon

# NORTH CAROLINA STATE UNIVERSITY AT RALEIGH

DIVISION OF STUDENT AFFAIRS

DEPARTMENT OF STUDENT DEVELOPMENT  
Box 5505  
RALEIGH, N. C. 27607

May 12, 1975

## MEMORANDUM

TO: Dr. Banks C. Talley, Jr., Vice Chancellor

FROM: Donald H. Solomon *DHS*

SUBJECT: Title IX

While I have already explained to you the reasons for the delay in getting this summary to you, I would again like to apologize for the unusual delay.

I have reviewed the revised guidelines for Title IX. My understanding is that before they become final the President must sign them, and he has not done so as of this date. They are likely to be approved as submitted. The following sections of Title IX appear to have some implications for our Division.

1. Dissemination of Policy. Each institution under the jurisdiction of this statute must implement specific and continuing steps to notify applicants for admission and employment . . . that it does not discriminate on the basis of sex in the educational programs or activities which it operates. This requirement means that a statement similar to that above must be included in booklets, catalogs, application forms, etc., which are used in connection with the recruitment of students or employees. The Admissions Office will have to be informed.
2. Exemption of Social Fraternities and Social Sororities. Social fraternities and social sororities are exempt from the requirements of Title IX. Also exempt are voluntary youth service organizations which are exempt from taxation under a specific provision of the IRS code. That may have implications for some of our service groups. It appears that those honoraries which are single sexed are not exempt from the act.
3. Admission. We appear to be in compliance with every requirement of the Admissions section except that part which provides that we "shall not make pre-admission inquiry as to the marital status of an applicant."
4. Educational Programs and Activities. Except where specifically exempted, no person, on the basis of sex, be excluded from participation in academic, extra-curricular, or other educational programs or activities. One specific provision that we are clearly in violation of is the provision that prohibits



applying any rule concerning domicile or residency, including eligibility for in-state fees and tuition, on the basis of sex. I think everyone in the state recognizes we are in violation, but at this point it is my understanding that the state common law is contrary to the legislation and the administrative offices at Chapel Hill have not indicated that we should change the existing policy.

I suspect there may be other programs under the auspices of the Division of Student Affairs that raise questions, and I have to rely on inquiries from members of the Division to evaluate the status of their programs.

5. Housing. The housing section has not changed from the earlier draft. Housing comparable in quality and cost must be provided and it must be proportionate in quantity to the number of students of that sex applying for housing.
6. Financial Assistance. This area is somewhat complex. Essentially, it requires that sex restrictive scholarships may be offered if there is non-discriminatory pooling of said scholarships. Pooling apparently means "that the overall effect of the award of such sex-restricted scholarships, fellowships, and other forms of financial assistance does not discriminate on the basis of sex." (Emphasis added.) I will follow up with Mr. Eycke on this problem.
7. Employment Assistance to Students. There are a number of specific requirements regarding employment, and I will have to review those with Ray Tew and Mr. Eycke. Nothing in this section is of major importance.
8. Athletics. Most of the requirements in athletics are not applicable to our operation except those matters pertaining to athletic scholarships. I will review that section with Mr. Eycke. Basically, scholarships must be awarded to members of each sex in proportion to the number of students of each sex participating in athletics. Athletic scholarships for members of each sex may be provided as part of separate athletic teams for members of each sex to the extent consistent with the other requirements. The remainder of the section is too detailed to discuss here.
9. Employment. This large section contains many things that are self-evident; non-discriminatory recruitment and hiring, equal pay, equal fringe benefits, and regulations concerning marital and parental status (obviously cannot be a factor). There is a provision that allows the University to demonstrate that sex is a bona fide occupational qualification. Clearly, this will be interpreted narrowly, and I cannot think of a position in our Division to which this exception would apply.
10. Hearings, Grievances, etc. The remainder of the regulations deal with complaints, procedures, hearings, etc. I think it is unnecessary to explain this section here.

If you need a more detailed review, let me know. I will take up problems with appropriate Department Heads if you agree.

DHS:ch



SCHEDULE OF ACTIVITIES AND STUDIES CALLED FOR IN  
"THE N.C. STATE PLAN FOR THE FUTURE ELIMINATION OF RACIAL DUALITY IN THE POST SECONDARY ED. SYSTEM"

ACTIVITY/STUDY	RESPONSIBILITY	DUE DATE	REFERENCE PAGE NUMBERS	NOTES ON DATA COLLECTION IMPLICATION
1. Provide HEW with detailed estimates of racial impact on student enrollments and faculty participation in interinstitutional cooperation programs.	President	by 5/1/1974	204	<i>List held year over student and faculty as well as those from other institutions.</i>
2. Identify, as part of long range plan development, possible instances of racially-based program duplication and recommend changes found to be needed.	President	by 7/1/1974	200-03	
3. Semi-annual progress reports.	President	7-1-74-78 2-1-75-78	238	<i>Major Report in January. Update in July.</i>
4. Evaluate student selection and admissions procedures and techniques.	President	by 12/1/1974	99-104	<i>Expansion of current 8-4 report</i>
5. Evaluate remedial and compensatory education programs and plan programs responsive to needs found.	President	by 12/1/1974	105-08	
6. Evaluate strengths and weaknesses of predominantly black institutions and develop program for remedying financial and other deficiencies.	President	12/31/74	186-87	

SCHEDULE OF ACTIVITIES AND STUDIES CALLED FOR IN  
 "THE N.C. STATE PLAN FOR THE FUTURE ELIMINATION OF RACIAL DUALITY IN THE POST SECONDARY ED. SYSTEM"

ACTIVITY/STUDY	RESPONSIBILITY	DUE DATE	REFERENCE PAGE NUMBERS	NOTES ON DATA COLLECTION IMPLICATION
CONTINUED				
7. Request appropriation of \$300,000 "minority presence" scholarship fund for 1975-76, to enable needy North Carolina students to attend constituent institutions in which they are in racial minority; to be continued if found successful.	President and Chancellors	1/1/75	134-35	
8. Evaluate best forms and cost of student financial aid programs to enhance student attendance at constituent institutions.	President and State Education Assistance Authority	1/1/75	136-37	
9. Staff Educational Opportunities Information Center to inform prospective students as to available institutions, programs, financial aid, etc., in order to promote greater attendance.	President	7/1/75	115-16	<i>Fund request in 75-76 Legislative Request</i>
10. Issue additional publications to inform prospective students about available institutions and programs and their accessibility.	President	7/1/75	118-19	
11. Modify data collection in Financial Aid.	President	7/1/75	134	

SCHEDULE OF ACTIVITIES AND STUDIES CALLED FOR IN  
 "THE N.C. STATE PLAN FOR THE FUTURE ELIMINATION OF RACIAL DUALITY IN THE POST SECONDARY ED. SYSTEM"

ACTIVITY/STUDY	RESPONSIBILITY	DUE DATE	REFERENCE PAGE NUMBERS	NOTES ON DATA COLLECTION IMPLICATION
CONTINUED				
12. Evaluate need, feasibility, means, costs, and benefits of a program to assist faculty members to pursue further graduate work in order to complete degrees or otherwise increase competence.	President	7/1/75	173-74	<i>Probably handled between VP Dawson and Chief Academic Officer</i>
13. Test common application form for all 16 constituent institutions to facilitate attendance.	President	7/1/76	116-17	<i>Form to be included on all the applications. Must apply to each individual institution he is interested in.</i>
14. Evaluate means and costs of increasing faculty exchanges among constituent institutions to increase "minority presence" faculty on all constituent institution campuses.	President	1974-77	156-58	
15. Continue cooperative work with Community College System to facilitate transfer between community colleges and constituent institutions of The University.	President, Chancellors, and State President of Community College System	1974-78	109-10	
16. Continue and intensify dissemination of information about non-discriminatory admissions policies of institutions.	Chancellors	1974-78	119-20	

SCHEDULE OF ACTIVITIES AND STUDIES CALLED FOR IN  
 "THE N.C. STATE PLAN FOR THE FUTURE ELIMINATION OF RACIAL DUALITY IN THE POST SECONDARY ED. SYSTEM"

ACTIVITY/STUDY	RESPONSIBILITY	DUE DATE	REFERENCE PAGE NUMBERS	NOTES ON DATA COLLECTION IMPLICATION
CONTINUED				
17. Add "minority presence" member (i. e., person in the racial minority in that institution) to recruiting staff of each institution.	Chancellors	1974-78	123	
18. Conduct workshops and conferences for high school counsellors to increase their knowledge of all public institutions and programs and to encourage them to advise students to select institutions without respect to race.	President and Chancellors	1974-78	123-24	
19. Continue to make recruiting visits only to high schools where recruiters are invited without respect to race.	President and Chancellors	1974-78	126	
20. Continue to invite prospective students without respect to race to visit all 16 institutions.	Chancellors	1974-78	126-27	
21. Evaluate impact of advance deposit requirements on attendance at constituent institutions.	President	1974-78	129-30	<i>Study by Admissions Office.</i>
22. Require all student organizations to give assurances of nondiscriminatory membership policies as condition of institutional sanction.	Chancellors	1974-78	143	

SCHEDULE OF ACTIVITIES AND STUDIES CALLED FOR IN  
 "THE N.C. STATE PLAN FOR THE FUTURE ELIMINATION OF RACIAL DUALITY IN THE POST SECONDARY ED. SYSTEM"

ACTIVITY/STUDY	RESPONSIBILITY	DUE DATE	REFERENCE PAGE NUMBERS	NOTES ON DATA COLLECTION IMPLICATION
CONTINUED				
23. Administer affirmative action programs adopted under requirement of executive orders to increase "minority presence" faculty and staff on each campus.	Chancellors	1974-78	151-54	<i>No additional data from off. Action Plan</i>
24. Investigate opportunities for and encourage faculty exchanges and joint appointments between constituent institutions, especially where designed to achieve greater "minority presence" within faculties.	President	1974-78	156-58	
25. Encourage more black students to enter graduate school and prepare to become faculty members.	President and Chancellors	1974-78	158-60	



ADMINISTRATIVE COUNCIL

Title IX Report  
January 28, 1976

- A. Title IX
  - 1. Overview of Title IX.
  - 2. Self-Evaluation Organization.
  - 3. Self-Evaluation Progress Report.
  - 4. Revised Time Table.
  - 5. Questions
  
- B. Affirmative Action Addendum
  
- C. NCSU Conference on Minorities in Graduate Programs.



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Editorial Assistant

## PARTIAL LIST OF ACTIONS INSTITUTIONS MUST TAKE UNDER TITLE IX

Title IX of the Education Amendments of 1972 prohibits discrimination on the basis of sex in all federally funded education programs. The regulation for Title IX, which became effective on July 21, 1975, specifies a number of actions that educational institutions receiving federal funds (as well as other recipients of federal education funds) must take in order to be in compliance with the law.

The following list highlights some of the specific actions that the regulation requires.<sup>1</sup> The section of the regulation which spells out the requirements is noted in the left hand margin. Institutions (as well as other recipients of federal education funds) must do the following:<sup>2</sup>

- 86.3 I. Conduct a self evaluation to identify sex discrimination by July 21, 1976.<sup>3</sup>  
As a part of this requirement, recipients must:
- Evaluate their policies and practices concerning both employment (both academic and nonacademic), and students (treatment and, where applicable, admission).
  - Modify any policy or practice which discriminates on the basis of sex.
  - Take "appropriate remedial steps" to eliminate the effects of discrimination.
  - Have these materials on file for at least three years after the completion of the evaluation.
- 86.4 II. Assure the federal government that they are complying with the requirements of Title IX.
- All applications for federal education funds must be accompanied by an assurance of compliance with Title IX. (The Office for Civil Rights is developing a form to facilitate this.)
- 86.8(a) III. Designate at least one employee responsible for:
- Coordinating efforts to comply with the Title IX regulation.
  - Investigating any Title IX complaint that is communicated to the recipient.
- 86.8(a) IV. Notify all of its students and employees of the appointment of the person(s) responsible for Title IX compliance. This notification must include the following information about the designated employee(s):
- Name(s).
  - Office address(es).
  - Telephone number(s).



- 86.8(b) V. Adopt and publish grievance procedures for both student and employee complaints under Title IX.<sup>4</sup>
- 86.9 VI. Notify, by October 19, 1975, certain persons and groups about the recipient's nondiscriminatory policy and Title IX obligations.
- A. This notice must state that:
- The recipient does not discriminate on the basis of sex.
  - Its obligations under Title IX prohibit such nondiscrimination.
  - Inquiries concerning Title IX can be referred to the designated Title IX compliance person(s) or to the Director of the Office for Civil Rights, Department of Health, Education and Welfare, Washington, D.C. 20201.
- B. The recipient must implement specific and continuing steps to notify the following groups of the nondiscriminatory policy under Title IX;
- Applicants for admission and employment. *John T. ...*
  - Students.
  - Employees.
  - Sources of referral of applicants for admission and employment.
  - All unions or professional organizations holding collective bargaining or professional agreements with the recipient.
- C. This notification of the nondiscriminatory policy under Title IX must appear in:
- Local newspapers.
  - Newspapers and magazines operated by the recipient or by student, alumnae, or alumni groups.
  - Memoranda or other written communications distributed to every student and employee.
- D. This notification of nondiscrimination must be prominently placed in each announcement, bulletin, catalog or application form used in connection with recruiting students or employees.<sup>6</sup>
- 86.9(c) VII. Notify its admission and recruitment representatives (for both students and employees) of the policy of nondiscrimination and require these persons to adhere to this policy.
- 86.12(b) VIII. Regarding institutions which are eligible for a "religious exemption" from portions of Title IX:
- Submit a statement by the highest ranking official of the institution identifying the requirements of the Title IX regulation which conflict with a specific religious tenet of the religious organization which controls the institution.
- 86.31(d) IX. \*Regarding programs not operated by the recipient:
- Develop and implement a procedure designed to assure itself that required programs and activities operated by these other programs do not discriminate on the basis of sex, against the recipient's applicants, students or employees.
- 86.32(c) (2) X. \*Regarding housing not provided by the recipient (institution), but which the recipient solicits, lists, approves or assists:
- Take "reasonable action" to assure itself that this housing is proportionate in quantity and comparable in quality and cost to students of both sexes.

- 86.34 XI. \*Regarding physical education opportunities:
- Comply fully with these requirements "as expeditiously as possible," but not later than July 21, 1978 (for secondary and post-secondary institutions).<sup>7</sup> (HEW has repeatedly emphasized that this three year period for physical education programs is a transition period, not a waiting period.)
- 86.36(b) XII. \*Regarding student counseling and appraisal materials:
- Develop and use internal procedures for ensuring that these materials do not discriminate on the basis of sex.
- 86.36(c) XIII. \*Regarding disproportionate representation of one sex in classes:
- Assure itself that such disproportion is not the result of sex discrimination in counseling or appraisal materials, sex discriminatory application of these materials, or sex discrimination by academic or guidance counselors.
- 86.37 XIV. \*Regarding financial assistance:
- Develop and use procedures to assure overall nondiscrimination if the recipient provides any single sex financial assistance established by wills, bequests, etc.
  - If aid is given to athletes, provide "reasonable opportunities" for athletic scholarships and grants in aid for members of each sex "in proportion to the number of students of each sex participating in intercollegiate athletics."
- 86.38(a) XV. \*Regarding student placement services:
- Assure itself that any agency, organization or person, which it assists in making employment available to students, provides employment without discrimination on the basis of sex.
- 86.40(b)(3) XVI. \*Regarding separate classes or activities for pregnant students:
- Ensure that any separate program, if offered, is comparable to that offered to non-pregnant students.<sup>8</sup>
- 86.41(d) XVII. Regarding athletic opportunities:
- Comply fully with the requirements regarding athletics "as expeditiously as possible," but not later than July 21, 1978 (for secondary and post-secondary institutions).<sup>9</sup> (HEW has repeatedly emphasized that this three-year period is a transition period, not a waiting period.)

FOOTNOTES

<sup>1</sup>For a more comprehensive description of what institutions and other recipients of federal education funds must do in order to be in compliance with Title IX, the reader is strongly urged to consult the regulation itself (45 CFR Part 86), which can be found at 40 Fed. Reg. 24128-45 (1975) or obtained from the Office for Civil Rights, Department of Health, Education and Welfare, Washington, D.C. 20201.

<sup>2</sup>Unless otherwise noted, the effective date of the requirement is July 21, 1975 (the effective date of the regulation).

<sup>3</sup>Starred items should be included as a part of the self evaluation.

<sup>4</sup>Although institutions must have such a procedure, there is no requirement that individuals who believe that they have faced sex discrimination prohibited by Title IX must use this procedure.

<sup>5</sup>Parents of elementary and secondary students must also be notified.

<sup>6</sup>Additionally the regulation bars recipients from using or distributing such publications if they suggest, "by text or illustration," that the recipient discriminates on the basis of sex in violation of Title IX [86.9(b)(2)].

<sup>7</sup>Elementary schools must comply with the provisions of this section no later than July 21, 1976.

<sup>8</sup>The regulation requires that participation in these programs be completely voluntary.

<sup>9</sup>Elementary schools must comply with the provisions of this section no later than July 21, 1976.



## NORTH CAROLINA STATE UNIVERSITY

## TITLE IX - SELF EVALUATION ORGANIZATION

For North Carolina State University's self evaluation eighteen(18) units with a Coordinator and Task Force for each unit has been established. In addition, a University Title IX Advisory Committee has been appointed. The 18 unit Coordinators and Task Force members, and the members of the Advisory Committee are shown below:

Title IX Advisory Committee Members

Charles F. Murphy, Chairman	(Crop Science, 118 Williams)
Andrea L. Berle	(Physical Education, 210-B Carmichael)
Henry S. Brown	(Geosciences, 228-B Withers)
Willis R. Casey	(Athletics, Case Athletics Center)
H. Bradford Craig	(ALS Acad. Affairs, 107 Patterson)
Maria-Luise Fiedler	(Engr. Research, 3145 Burlington)
W. Curtis Fitzgerald	(Philosophy & Rel., 134 Harrelson)
Vincent M. Foote	(Product Design, 310-A Brooks)
Beth Gardner	(Personnel, Primrose)
Harvey J. Gold	(Statistics, 513-B Cox)
Irving S. Goldstein	(Wood & Paper Science, 1022-N Biltmore)
Mary Frances Hester	(Ext. & Public Serv., 138 1911 Bldg.)
Carolyn S. Jessup	(Clark Infirmary)
Anna P. Keller	(Admissions, 112 Peele)
I. T. Littleton	(D. H. Hill Library)
Geraldine H. Luginbuhl	(Microbiology, 4608 Gardner)
Charles B. Lynam	(Personnel, Primrose)
Patrick H. McDonald	(Engr. Sci. & Mech., 119-A Riddick)
J. Michael Moore	(413-B Bragaw Res. Hall, Box 15178)
Barbara M. Parramore	(Curriculum & Instruction, 402-C Poe)
Lu Anne Rogers	(905-C Lee Res. Hall, Box 15893)
Mary Beth Spina	(908-A Lee Res. Hall, Box 15903)
Thomas H. Stafford, Jr.	(Student Affairs Plan. & Res., 215 Alumni)
Vivian T. Stannett	(Graduate School, 103 Peele)
Page B. Sutton	(Physical Plant, 100 Morris Bldg.)
Mary E. Wheeler	(History, 106 Harrelson)
Richard R. Wilkinson	(Landscape Arch., 310-C Brooks)
James B. Wilson	(Mathematics, 234 Harrelson)
Mary C. Williams	(English, 207 Winston)

Title IX Advisory Committee

Sub-Committees

Grievance Procedures

James B. Wilson, Chm.  
Mary Beth Spina  
Beth Gardrer

Recruitment and Admissions (Undergraduate)

Vincent M. Foote, Chm.  
H. Bradford Craig  
Anna P. Keller

Recruitment and Admissions (Graduate)

Vivian T. Stannett, Chm.  
Geraldine H. Luginbuhl  
Patrick H. McDonald

Academic Programs (Including Physical Education)

Mary C. Williams, Chm.  
Andrea L. Berle  
Harvey J. Gold

Financial Aid

Barbara M. Parramore, Chm.  
Thomas H. Stafford, Jr.  
Henry S. Brown

Student Services

W. Curtis Fitzgerald, Chm.  
Carolyn S. Jessup  
Irving S. Goldstein  
J. Michael Moore

Employment (Hourly, SPA and EPA)

I. T. Littleton, Chm.  
Maria-Louise Fiedler  
Charles B. Lynam

Athletics

Willis R. Casey, Chm.  
Lu Anne Rogers  
Richard R. Wilkinson



Publications

Mary Francis Hester, Chm.  
Page B. Sutton  
Mary E. Wheeler

Publicity and Follow-up

Charles F. Murphy, Chm.  
James B. Wilson  
Mary Beth Spina  
Vincent M. Foote  
Vivian T. Stannett  
Mary C. Williams

Barbara M. Parramore  
W. Curtis Fitzgerald  
I. T. Littleton  
Willis R. Casey  
Mary Francis Hester

Title IX Unit Coordinators and Task Force Members

Agriculture & Life Sciences

Elizabeth Theil, Coordinator

Task Force Members

W. B. Clifford  
Thelma L. Hinson  
Dale F. Matzinger  
R. W. Gay, Jr.  
Jo Warren

Design

John Tector, Coordinator

Task Force Members

Linda Jewell  
Patricia Parrish  
Margaret Zehr

Education

Virginia Cowgill, Coordinator

Task Force Members

Julia McVay  
Barbara Fox  
Herbert Speece  
J. L. Compton  
John Coster

Engineering

John Ely, Coordinator

Task Force Members

Arthur Eckels  
Frances M. Richardson

Forest Resources

LeRoy C. Saylor, Coordinator

Liberal Arts

Linda Holley, Coordinator

Task Force Members

Virginia Downs  
Patricia Tobin  
Mary Holcolm  
Debra Stewart  
Mary Paschal  
John Riddle  
Lawrence Highfill  
Raymond Camp

Physical & Mathematical Sciences

R. J. Monroe, Coordinator

Task Force Members

G. J. Shaw W. E. Robbins  
V. V. Cavároc S. O. Paur  
R. R. Patty

Textiles

J. F. Bogdan, Coordinator

Task Force Members

Dame S. Hamby W. Whaley  
M. R. Shaw William E. Smith

University Extension

R. A. Mabry, Coordinator

Task Force Members

R. A. Mabry  
Leigh H. Hammond  
Charles F. Kolb

Graduate School

R. J. Peeler, Coordinator

Athletics

Frank Weedon, Coordinator

Library

Nell Waltner, Coordinator

Task Force Members

Evelyn White Donald S. Keener  
Albert Hardy Susan Welch  
Claudia Thompson

Student Affairs

Donald H. Solomon, Coordinator

Task Force Members

Raymond E. Tew Jeff Mann  
James H. Bundy Paul B. Marion  
George R. Dixon O. B. Wooldridge  
Carolyn Jessup T. H. Stafford  
J. Perry Watson  
R. K. White  
Carl O. Eycke  
Henry Bowers

Title IX Unit Coordinators and Task Force Members (Cont'd)

Business Affairs and/or SPA

Bud Lynam )  
Ruth Ellis)- Coordinators

Alumni Affairs

Doug Unwin, Coordinator

Task Force Members  
Virginia Hailey  
Joyce Williams

Physical Education

Lynn Berle, Coordinator

Task Force Members  
Lynn Berle  
Fred Drews

Information Services

Joe Hancock, Coordinator

University Studies (Includes Special Units)

James Wallace, Coordinator

Title IX Self-Evaluation Format

- A. A description of the pattern of organization of your unit.
- B. A description of the unit's technique of inquiry. Briefly describe data collection (surveys, questionnaires, etc.), any statistical procedures utilized, etc.

For determining patterns and trends, please consider data dated on or after July, 1972.

- C. Undergraduate Programs including sub-units reports

Your report should include your investigation of policies and practices with regard to:

- Recruitment
- Admissions
- Enrollment
- Financial aid (including student employment)
- Advising of students (including subtle practices of stereotyping) and career counseling
- Placement of students
- Student academic and honorary organizations
- Publications (program descriptions in manuals, catalogues, brochures, newsletters, etc.)

Note: Physical Education report should be included in Liberal Arts Unit Report.

- D. Graduate Programs including sub-units reports

Your report should include your investigation of policies and practices with regard to:

- Recruitment
- Admissions
- Enrollment
- Financial aid (including student employment)
- Advising of students (including subtle practices of stereotyping) and career counseling
- Placement of students
- Student academic and honorary organizations
- Publications (program descriptions in manuals, catalogues, brochures, newsletters, etc.)

- E. Student Affairs

Your report should include your investigations of University policies and practices in the following areas:

- Admissions
- Recruitment
- Financial aid (including student employment)



- Housing (including off-campus housing)
- Counseling and career placement
- Intramural athletics
- Other student services
- Publications

#### F. Athletics

As you will have noted, we have treated intramural athletics as extra curricular or instructionally related rather than akin to the question of intercollegiate athletics. As to the latter, we would expect that a comprehensive plan to achieve compliance should be in place by late spring. It should include specific procedures and criteria for reassessment and redefinition as you learn from implementing it. See Section C Intercollegiate Athletics page 4 of "Guidelines for Title IX Unit Self-Evaluation" dated November 17, 1975.

#### G. Employment

We will rely here on our Affirmative Action Plan pursuant to Executive Order 11246. Therefore, employment activities with respect to Title IX should be correlated with the Affirmative Action Officer for your particular unit.

Note that during the spring semester (spring 1976) we will be preparing an addendum to our current Affirmative Action Plan. The addendum will cover another three-year period beginning July 1, 1976-June 30, 1979.

#### H. Unsolved Problems

You should state what areas of inquiry or change remain unsolved and why. Isolate those areas which will require University action.

#### I. Monitoring system and follow-up

The report should describe the monitoring system you will use and how it will demonstrate to you that changes are being implemented satisfactorily so you may direct further action if necessary.

#### J. Grievance Procedures

Your report should describe a set of informal grievance procedures and how these procedures will be implemented which would be afforded students and/or employees. (Note that the Title IX Advisory Committee will give attention to formal grievance procedures.)

#### K. Publicity

Your report should describe the manner in which your unit will inform and continue to inform students and/or employees of their rights as covered under Title IX.

NONDISCRIMINATION STATEMENT

North Carolina State University

North Carolina State University is dedicated to equality of opportunity within its community. Accordingly, North Carolina State University does not practice or condone discrimination, in any form, against students, employees, or applicants on the ground of race, color, national origin, religion, sex, age, or handicap. North Carolina State University commits itself to positive action to secure equal opportunity regardless of those characteristics.

North Carolina State University supports the protection available to members of its community under all applicable Federal laws, including Titles VI and VII of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, Sections 799A and 845 of the Public Health Service Act, and the Equal Pay and Age Discrimination Acts, the Rehabilitation Act of 1973, and Executive Order 11246. For information concerning these provisions, contact:

Dr. Lawrence M. Clark

Assistant Provost and  
Affirmative Action Officer

208 Holladay Hall  
North Carolina State University  
Raleigh, North Carolina 27607

737-3148.

TAG LINE:

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North Carolina State University does not discriminate on the basis of sex or race, and is an affirmative action/equal opportunity institution.



6/23/76

I. Cyclical activities for continuing compliance

(Required by HEW regulations at 86.8(a) (b) (d), 86.9)

- (a) necessary to have an Affirmative Action (Title IX) Officer
- (b) continued availability of Title IX Grievance Procedures
- (c) maintaining and making necessary changes in the self-evaluation documentation
- (d) successful accomplishment of the Title IX report's recommendations
- (e) continuing notification of Title IX protections to all covered groups and individuals.

General Administration identified 3 substantive areas requiring special long term attention

- 1. intercollegiate athletics
- 2. employment
- 3. increased participation by members of each sex in areas where their past experience has been limited or small.

## Admissions and Recruitment

A. There is an increasing need, as admissions become more selective, to assure that the UPGA regression equation does not predict differently for males and females.

B. School reports regarding Graduate Admission and financial aid were less comprehensive than the undergraduate analysis. The General Administration urges following the Advisory committee recommendations in this area.

1. monitor and update yearly the proportions of M/F in each graduate program at the Masters and Doctorate level.
2. have complete data on number of applications number of admissions and enrollments and amounts of financial aid offered and accepted for each sex.

## Financial Aid

The General Administration pinpointed two areas of concern: student employment and graduate financial aid.

They suggested that the advisory committee's proposals would effectively monitor the area of student employment.

## Recommendations

1. An inventory of on-campus jobs be made showing the kinds of work available for student employment and those on the work-study program and that the inventory be reviewed with students seeking aid as a means of encouraging students to seek work in less traditionally sex-stereotyped jobs.

2. A study be undertaken to describe and analyze the impact of work generated within the University on the Title IX provisions followed by the development of uniform policies for temporary and student employees.
3. All departments/units receiving information about miscellaneous jobs post announcements on bulletin boards to make more accessible information about work opportunities.

The General Administration stressed the importance of documenting explanations for disparities in the award of financial aid. Advisory recommendations in this area:

1. Academic departments maintain a record of criteria used to award financial aid to graduate students to demonstrate compliance with Title IX and the University's commitment to non-discriminatory practices.
2. All schools/departments/units providing numbers of males and females receiving aid furnish the average amount and range of financial aid for females and males to determine compliance with Title IX.
3. Retrieval of information through data processing be considered in determining compliance with Title IX.
4. Data on financial aid be made more readily available to applicants, students, advisers, and employers (on campus).
5. All members of the University community become better informed about the extent of financial aid opportunities and the importance of non-discriminatory practices with respect to the award of financial aid in both number proportions and dollar value for females and males.

### Academic Programs

The importance of academic and other forms of counseling was noted. Recruitment efforts must be followed with supportive counseling from matriculation through employment.

## Individual School Reports

### 1. ALS

The monitoring procedures suggested by the Student Services Advisory report, that would be useful to the ALS placement service are:

- 1) Center provide its services to all students requesting them
- 2) Students are informed of the ALS Placement Service's policies regarding discrimination
- 3) Prospective employers are informed that the Service will not participate in, condone, or tolerate discrimination practices on the part of the employer representatives.

### 2. Design

The School of Design did not run an analysis of the numbers and proportions of males and females applying, admitted and enrolled in each department. The General Administration suggests that this type of study is most useful in determining Title IX compliance. Numbers, proportions and amounts of financial aid distributed should also be studied, especially at the graduate level.

### 3. Education

A comparison of the Department of Psychology with national trends on the undergraduate level might help in explaining recent fluctuations in that department.

There was no detailed description of monitoring in Placement, considered essential in education programs.

### 4. Liberal Arts

The General Administration recommends specific analysis of departmental graduate admission and financial aid patterns.

5. PAMS

Would increased recruiting and counseling increase female enrollment?

6. Textiles

The information presented in the report needs to be compared with national trends or some other benchmark to be fully utilized. The school's placement service should have monitoring procedures; see ALS, as it is quite extensive.



A) Physical Education

1. P.E. has developed criteria for determining when the separation of classes is necessary. These premises may be consistent with HEW's determination of a 'contact sport' but this is not clearly so. In applying their criteria, the P.E. department should take care that their criteria meet that of the regulations.

2. Separate PE 100 courses

The issue at question is the effect of physical differences between men and women generally on activity, performance and grading. The General Administration supports the Advisory Committee recommendation.

In co-educational Physical Education classes, instructors should apply skills tests that are fair to both men and women and should inform students about the tests being used so that students do not assume that grading is discriminatory or capricious. The General Administration believes HEW regulations contemplate integrated classes and that the reasons stated for separate PE 100 classes are insufficient.

B) Intercollegiate Athletics

I. The General Administration recommends reviewing coaching from two perspectives:

- 1) equality of opportunity for those receiving coaching
- 2) equality in employment opportunities for coaches as employees.

(Women's teams should not automatically receive female coaches, etc.)

II. NCSU should directly address the AIAW on its limitations on NCSU's women's programs.

III. There is a need for clear internal monitoring procedures in the distribution of financial aid. It is recommended that specific procedures be adopted to ascertain that the criteria provides for the award of aid in compliance with HEW regulations.

IV. NCSU should be prepared to demonstrate its commitment (financially) to women's athletics (travel money, women's facilities).

V. Growth of women's athletics must be compared to men's athletics as well as on its own terms.

TITLE IX CONFERENCE

REPORT BY NORTH CAROLINA STATE UNIVERSITY

TITLE - Rules and Regulations, Subpart D - "Discrimination on the Basis of Sex in Education Programs and Activities" - Analysis of traditional "Student Affairs" functions

This report is an analysis of Sections 86.31 (in part), 86.32, 86.33, 86.38, 86.39, and 86.40 of the rules and regulations adopted by the Department of Health, Education, and Welfare to implement Title IX of the Education Amendments of 1972. The sections to be analyzed constitute the majority of the rules applicable to Student Affairs departments.

The objective of this analysis was not to select or determine the "right" way of complying with the rules. The vagueness and ambiguity of much of the regulatory language make such an effort meaningless. Instead, our goal was to identify issues and questions suggested by the regulations and, where possible, to suggest methods acceptable for compliance. The weakness in our method of analysis (which is primarily problem identification) is it is limited by our experiences, primarily those on our campus. However, whenever possible, we tried to broaden our inquiry; and we believe we have addressed most of the problems common to the constituent institutions. There are, undoubtedly, many situations on other campuses that we failed to identify but hope the analysis we have applied to other problems will be helpful.

SUBPART D - DISCRIMINATION ON THE BASIS OF SEX IN EDUCATION PROGRAMS AND ACTIVITIES  
PROHIBITED

86.31 EDUCATION PROGRAMS AND ACTIVITIES.

- (a) General. Except as provided elsewhere in this part, no person shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any academic, extracurricular, research, occupational training, or other education program or activity operated by a recipient which receives or

benefits from Federal financial assistance. This subpart does not apply to actions of a recipient in connection with admission of its students to an education program or activity of (1) a recipient to which Subpart C does not apply, or (2) an entity, not a recipient, to which Subpart C would not apply if the entity were a recipient.

This subsection is a broad statement of the basic principles of the legislation and with one exception is reasonably easy to understand. The one place of potential confusion is the last part of the lengthy first sentence: ". . . other education program or activity operated by a recipient which receives or benefits from Federal financial assistance." The reference to Federal financial assistance applies to "recipient" not to "programs;" i.e., programs not receiving Federal financial assistance, a Counseling Center for example are not permitted to discriminate when the recipient (the University) receives or benefits from Federal financial assistance (which all the constituent institutions).

- (b) Specific Prohibitions. Except as provided in this subpart, in providing any aid, benefit, or service to a student, a recipient shall not, on the basis of sex:
- (1) Treat one person differently from another in determining whether such person satisfies any requirement or condition for the provision of such aid, benefit, or service;
  - (2) Provide different aid, benefits, or services or provide aid, benefits, or services in a different manner;
  - (3) Deny any person any such aid, benefit, or service;
  - (4) Subject any person to separate or different rules of behavior, sanctions, or other treatment;
  - (5) Discriminate against any person in the application of any rules of appearance;

The first five specific prohibitions overlap considerably and can be looked at collectively. The clear intent of all five prohibitions is that the University must not discriminate on the basis of sex in its services, benefits, rules, regulations, policies, etc., including but not limited to its dress codes, appearance codes, visitation and curfew policies. Actually, a number

of prohibitions, particularly 4, are unlikely to be of consequence now, having been carefully reviewed by most universities several years ago. Attention should be paid to subsection 5. At some institutions there may be a need to review more closely policies like dress codes, with particular attention to traditional events and formal functions, where historically, appearance and attire were more strictly regulated by universities.

- (7) Aid or perpetuate discrimination against any person by providing significant assistance to any agency, organization, or person which discriminates on the basis of sex in providing any aid, benefit, or services to students or employees;

This subsection is one of the more difficult regulations to interpret. The University may not provide "significant assistance" to agencies which discriminate in providing aid, services, or benefits to students. This makes the University responsible for the policies and activities not only of on-campus organizations (recognized clubs, student government, etc.) but also of off-campus entities that are "associated" with the University in a way that the organization receives significant assistance.

At North Carolina State University the problem of defining "significant assistance" initially arose in the context of an all-male service fraternity that is officially recognized by the University, is provided space in a University building (including furniture, utilities, etc.), and has a faculty advisor. The answer was clear. There was little doubt that the nature of the University's aid was significant. More difficult questions are the examples that follow:

1. a University student group that is officially recognized and has a University advisor,
2. a group that is officially recognized,
3. a group where the advisor is only a formality for recognition.

A determination of significant assistance becomes very subjective. Use of space, we think, is clearly significant assistance as is money spent for



utilities or equipment. Faculty advisors--we recommend that each case be evaluated individually. If the activity of a faculty advisor is more than merely incidental to teaching responsibility (i.e., student government advisor, publications advisor) it would probably be significant assistance. If the advisors responsibility is merely a formality observed to the group can obtain University approval or recognition or not part of the faculty members "job responsibility," we believe such aid is not "significant assistance."

Another issue raised by this regulation is the requirement that the agency, organization, or person provide aid, benefit, or service to students. Does the motorcycle club provide aid, service, or benefit? Most University clubs are designed to bring people with common interests together so they can share ideas, interests, activities, etc. This is quite different than student government or the student newspaper which clearly provides a tangible work product. The sense we get from the regulations is that this section was intended to cover virtually all clubs, groups, and organizations regardless of the nature of their activity; however, we feel the language of this section permits a different interpretation. Further clarification is needed and we think the following question should be posed to the Department of Health, Education, and Welfare: Do all on-campus clubs and organizations provide aid, benefit, or service to the students regardless of the scope of their activity?

The issues for off-campus organizations are much the same as for on-campus groups--although we have found it difficult to identify an off-campus agency in the Student Affairs area that receives significant assistance from the University. Most off-campus agencies, organizations, and persons affecting the "activities" area (excluding housing, student employment, and financial aid which are discussed later) merely provide a place for students to get some experience with minimal University involvement (volunteer work, religious groups). Further, assuming a University provides significant assistance to off-campus



organizations, when does an off-campus agency provide an aid, benefit, or service to the student? (Essentially the same issue was raised for on-campus groups.) We do not have an answer that we feel comfortable with and refer back to the question above.

With respect to the issue of "significant assistance" to off-campus agencies and assuming for the moment that they do provide aid, etc., the issue is still a complex one. Assistance may range from posting notices on bulletin boards to coordination and training of volunteers and might also include selling or providing mailing lists, locating students, providing names and addresses. As a general rule we believe a routine clerical function on a one-time basis that requires a minimal amount of time is not significant assistance but anything more extensive, including use of facilities, would be significant assistance and would place a responsibility on the University with respect to sex discrimination.

Another issue raised by this subsection is the methods the University must employ to identify and respond to discriminatory practices. With respect to on-campus organizations, a reasonable procedure would be a review of all charters or constitutions; and if you have a situation on your campus where significant assistance is provided to an off-campus group or agency, we recommend that you be sensitive to the purpose of the outside group and take affirmative steps if the purpose suggests potential discriminatory activity or if a complaint is made. Having presented above this all-to-brief comment on fulfilling the responsibilities established by the regulations, further explanation is appropriate.

We believe it is virtually impossible for the University to effectively review the policies, or more importantly, the practices of organizations, agencies, and persons whether it be in housing, employment, or activities. The University does not have the staff, time, or money to effectively carry out this responsibility on a broad scale. Therefore, we offer the following procedure as a method of

insuring compliance with Title IX that is compatible with the ability of most universities:

1. Be extremely sensitive to the problem of sex discrimination; for example, be aware of areas where discriminatory practices have traditionally occurred; i.e., the telephone call requesting posting of a part-time job involving physical labor--this is traditionally a "man's" job. In this type of situation the caller should probably be informed that the offer must be open to men and women for the University to assist.
2. Actively publicize basic information about Title IX. Use Bulletin Boards, student newspapers, handbooks, and any other appropriate method to inform students of their rights.
3. Encourage students to report instances of sex discrimination. Tell them where and how to report complaints.
4. Take quick action to investigate all allegations of discrimination and take quick action if discriminatory activity is identified. Certainly, it is proper to discuss problems with those that are discriminating. Often they will not even be aware of Title IX. Education and information is most important and probably what we do best.
5. At some point decisive action will be necessary and we should be prepared to do what is necessary to comply with the law.

We believe the above steps are appropriate to deal with the problem of discrimination, and we also believe they comply with the requirements of the regulations.

- (a) Generally. A recipient shall not, on the basis of sex, apply different fees or requirements, or offer different services or benefits related to housing, except as provided in this section (including housing provided only to married students).
- (b) Housing provided by recipient.
- (1) A recipient may provide separate housing on the basis of sex.
  - (2) Housing provided by a recipient to students of one sex, when compared to that provided to students of the other sex, shall be as a whole:
    - (i) Proportionate in quantity to the number of students of that sex applying for such housing; and
    - (ii) Comparable in quality and cost to the student.
- (c) Other Housing.
- (1) A recipient shall not, on the basis of sex, administer different policies or practices concerning occupancy by its students of housing other than provided by such recipient.
  - (2) A recipient which, through solicitation, listing, approval of housing, or otherwise, assists any agency, organization, or person in making housing available to any of its students, shall take such reasonable action as may be necessary to assure itself that such housing as is provided to students of one sex, when compared to that provided to students of the other sex, is as a whole:
    - (i) Proportionate in quantity and
    - (ii) Comparable in quality and cost to the student. A recipient may render such assistance to any agency, organization, or person which provides all or part of such housing to students only of one sex.

Perhaps the nicest thing that can be said about this section is it is like the state fair--there is something here for everyone. Essentially, this section establishes a few basic principles of non-discrimination that are easily understood, and much of our analysis will be about the basics. But, for those who enjoy spending (or wasting) time thinking up difficult hypothetical situations, this section is a three-ring circus.

Beginning with the basics, the following are some simple do's and don't's:

1. You may have separate housing for each sex (86.32 (b)).
2. If you provide separate housing it must be provided to members of each sex in proportion to the number of students of each sex applying for housing. For example, if you have 300 spaces in residence halls and you have 600 people applying for spaces; and of the 600 applicants for housing, 400 are men and 200 are women. Then you must assign 200 men and 100 women to on-campus housing.
3. The housing provided for the 300 students (200 male-100 female) must be "comparable" "as a whole." Without getting complicated this means basically that if you compare all the women's housing with all the men's housing it should be as equal as possible in services, benefits, and costs. To evaluate comparability or equality the following are some factors that should be examined:
  1. Space (square feet) per student.
  2. Number of staff per students.
  3. Training and education of staff.
  4. Rent.
  5. Furniture.
  6. Lounge facilities, kitchens, recreation rooms, and facilities contained therein.
  7. Age.
  8. Location/accessibility.
  9. Bath and shower facilities (see 86.33).
  10. Maintenance and state of repair.
  11. Landscaping.
  12. Other (factors applicable to your campus).

You may even consider having students rate either the desirability of certain halls or of certain services. While all halls not being identical, certain conditions or features of each may balance out. For example, if you have two halls and one is air-conditioned and the other is not and it is unlikely that it ever will be, the non-air-conditioned hall may be comparable if it has other features the students prefer. (More on this later.)

4. You cannot have different rules or regulations for men and women if the basis of the rules is their sex difference. Therefore, no differences are permitted in curfews or visitation, dress codes, or sign-out policies unless the occupants themselves establish different policies. But you may have different rules for different halls even if the halls are single sex if the rule is not based on the sex difference. For example, you could have different parking regulations for a certain hall if traffic conditions made such a rule necessary, or you might have a different security procedure for a certain hall if its location (not the sex of the occupants) makes that hall more vulnerable to vandalism. The security should be equally effective for all halls, but to accomplish this you may need different rules or procedures.
5. You cannot require only members of one sex to live on campus.



6. You could permit all residence halls to decide what the curfew policy will be and consequently have different rules. This is permissible assuming you give each hall the same right to decide such policies.
7. If you have housing policies effecting students that live in non-university housing, those policies must be applicable to both sexes. You could not for example, require women to live in specific locations without doing the same for men. This subsection (c) (1) is reasonably straight forward and most universities do not regulate students in this respect.
8. If you help students find off-campus housing, regardless of the nature of assistance, whether it be posting notices, sending out letters about rentals, or make requests from landlords to list with your housing office, you are responsible for taking such reasonable action as is necessary to assure off-campus housing is, like on-campus housing, proportionate in number and comparable in quality and cost. Basically, this means that your listings for men and women should be in proportion to those looking for housing and the costs for a specific rental should be the same regardless of which sex leases. In addition, the number of "good" and "bad" apartments should be for each sex in proportion to the number needing housing and likewise the range of costs should be equal for both sexes. (Remember, we are trying to keep this simple--the problems later.)
9. You can assist people who rent only to one sex--but remember "proportionate"---the number of single sex apartments must be proportionate (to the number of each sex looking for housing).
10. With respect to off-campus housing, if you assist landlords you must "take such reasonable action as may be necessary to assure . . . " that, "as a whole," the housing is proportionate in quantity . . . and comparable in quality and cost . . . Our positions about responsibility for off-campus housing is very similar to what we have said about off-campus student activities and what we will say about employment assistance. It is impossible for the University to inspect all or any significant part of the total number of off-campus housing situations that it assists students with. It is also impossible to determine comparability with a questionnaire or a telephone interview. Facilities must be inspected if any meaningful evaluation is to be made. (You really cannot expect a landlord to tell you his place is in bad condition). In fact, even if one did, that does not mean you cannot assist him, you just have to find and list an equally bad place for a member of the other sex (if one is sex restricted); remember, the "as a whole" concept (which both places may be) must be satisfied. The idea of the University having any responsibility for off-campus housing is impractical not only for financial reasons but is also contrary to most of the principles of student development philosophy. Therefore, we recommend the procedures outlined on the last page of the section dealing with Education Program and Activities (86.31) and pages 2 and 3 of the section dealing with Employment Assistance to Students (86.38), which is basically notice of rights, response to complaints and prompt actions when necessary. Unless you have a small student population and can do individual inspections, we think this is the most reasonable

method, short of withdrawing assistance to off-campus landlords--a step that will obviously adversely effect students.

If the Housing regulations were as simple to understand as the preceding analysis indicates (and perhaps they are), we could move gracefully to the next section. But for those who either enjoy the question "Well, what about . . .?" or those who have enough experience with HEW to know that most of their material is not easy to deal with, we are going to raise a number of issues that do not lend themselves to easy answers.

1. 86.32 (c) (2) requires, as we have discussed, that if the University assists off-campus landlords, the University must take necessary steps to assure itself that separate off-campus housing as a whole is "proportionate in quantity." We offered a straightforward interpretation of this section. But really, proportionate in quantity to what--the total number of students of each sex not living on campus, or the number of each sex looking for housing at the beginning of the semester or perhaps either one of the above minus those living at home or proportionate to the number coming to the housing office requesting help. We do not really know and think HEW needs to solve this problem.
2. "Comparable in quality and cost"--we have also reviewed this concept. But what does it really mean? Obviously, different halls will have different amenities and in many cases the differences were based on the sex of the occupants. But let us assume (and NCSU housing people insist it is true) that it takes significantly more money to repair, renovate and maintain men's housing, let us say for discussion 20% more. If men and women pay the same fee but more money is spent for the benefit of men each year is this fair, or more specifically, is this "comparable in cost." Both sexes are paying the same amount but women are getting less for their money than men. The money is spent to keep the quality the same and the cost is equal but is it comparable? Is each sex getting the same thing for their dollar? A very difficult question to resolve.
3. Another issue about comparable quality. Assume there are two halls on the campus--one, all male, has new shower and bath facilities, the women's hall has older facilities that work reasonably well but are not nearly as comfortable as the men's, but the women also have kitchen facilities. All else being the same, are the different facilities comparable? What if the students, in a survey, indicate that they think they are? Does that make a difference? Does the men's hall have to get kitchens and the women's hall new showers? Do you have to switch sexes in each hall every year? Another example, again two halls each being single sex. The male hall has gang showers, the women's hall has individual stalls. Are they comparable? If not, does another benefit or service balance out the disadvantages of gang showers? A color TV in the lounge? If such a condition like gang showers only in men's halls does exist, admittedly it is probably the result of some stereotype that was made in the past and is still being made. But what if the men would rather have the color TV and



gang showers and the women the stall showers. The point is that the standard "comparable" is not that easy to understand or apply. Obviously, differences in services should not be based on sex. But how equal or comparable do things have to be. HEW does not want every residence hall to be exactly alike (we do not think they do), nor does HEW expect every hall to be up to the standard of the newest hall on campus (and even if they did, we could not afford to do so). There has got to be some balancing. Surely, the effort should be made to provide equal services to all students, and the good halls and the not-so-good halls should be given to men and women in proportion to their number in housing. But sometimes the formula will not work. And unless each and every residence hall goes completely co-educational, there are going to be balances and trade-offs made. Our only guidance is to be as fair as possible and perhaps, as we suggested earlier, survey the students so the various services and amenities can be rated. In addition whenever possible it would seem wise to make the services and benefits located in one hall available to students living in other halls. A game room in one hall, a snack bar in another, the kitchens and eating areas in a third, available to all resident students.

To conclude, this section is clearly the most complicated part of the Student Affairs sections, and if it is not already obvious, compliance will be a difficult undertaking.

### 86.33 COMPARABLE FACILITIES

A recipient may provide separate toilet, locker room, and shower facilities on the basis of sex, but facilities provided for students of one sex shall be comparable to such facilities provided for students of the other sex.

The primary problem with this section is determining whether it applies only to Housing (86.32) or to all University facilities situated after the Housing section and within the Subpart dealing primarily with Student Affairs matters; it appears this section affects only Housing (86.32). Conversely, the nature of the subject matter as well as its distinct separation from Housing permits a broader interpretation of its applicability. Further guidance is needed by HEW; but for the purpose of this paper, this section will be treated as a housing related matter and as such, compliance is relatively simple. If toilets, showers, and locker rooms are provided separately for each sex (which is permissible) the facilities must be comparable. Unlike the Housing section there is no indication of the ways in which the facilities must be comparable. We suggest review of the Housing section when considering this section. In addition, we recommend the following factors be considered:

1. The facilities be in proportion to the number of students of each sex living in campus housing.
2. The quality of separate facilities as a whole be comparable in the following areas:
  - a. Privacy--i.e., gang showers vs. individual showers, doors on toilet stalls.
  - b. Maintenance be equal for each facility.
  - c. Accessibility--location in halls.

This section appears to be somewhat of an afterthought; the Housing section adequately treats this area--probably does it more clearly and completely than this section standing alone. Having reached this conclusion, we have second thoughts and recognize that perhaps this section is applicable to more than just the housing area. If so, the issues will be addressed in another paper dealing with University facilities in general.

86.38 EMPLOYMENT ASSISTANCE TO STUDENTS

- (a) Assistance by recipient in making available outside employment. A recipient which assist any agency, organization or person in making employment available to any of its students:
- (1) Shall assure itself that such employment is made available without discrimination on the basis of sex; and
  - (2) Shall not render such services to any agency, organization, or person which discriminates on the basis of sex in its employment practices.
- (b) Employment of students by recipients. A recipient which employs any of its students shall not do so in a manner which violates Subpart E.

Our analysis will be limited primarily to subsection (a) of 86.38, because sub-section (b), which makes Subpart E of the regulations applicable to the University as an employer, is treated in a separate paper. For guidance on those matters where the University is an employer, the report on Subpart E should be reviewed.

Subsection (a) applies to two traditional activities engaged in by the University in the area of employment assistance: The career placement office which traditionally helps students find full-time employment after graduation and the office (usually Financial Aid) that handles part-time off-campus jobs for students.

The key to understanding this section is defining "assists" in subsection (a) and "assure" in subsection (a) (1).

"ASSIST"

--At what point is a university assisting in making employment available? We believe assistance is any activity that has the potential of putting an employer in contact with a student and includes but is not limited to the following kinds of activities:

1. Posting or advertising job opportunities.
2. Providing employers with names of specific students who are prospects for employment.

3. Offering University facilities for interviewing or related activity.
4. Publishing booklets or lists of students in specific curriculums who are graduating or seeking employment and distributing these lists to potential employers.
5. Individual professors providing names to employers of "outstanding" candidates for employment. (This is a difficult area and some distinction should be made between referral activity when it occurs on a professional basis vs. a personal friendship basis. The former is limited by the regulation while the latter might not be. Caution is advised because often a "friendship" with an individual in a personnel office of a private company is really a professional relationship.)
6. Any other activity that supports, aids, or helps employment activity.

"ASSURE"

If the University does assist an employer, the University must assure itself that employment is made available without sex discrimination. We believe there are a number of alternatives to meet this requirement. How and when they are used should be determined by the nature of the assistance provided an employer, the reputation of the employer, and the nature of the job. Some guidance will be offered below on how you might try to comply but before doing so we would like to re-emphasize a point made earlier. What is really more important and more reliable than a signed statement or verbal assurance is feedback about what actually occurs in employment situations. Not only is it more accurate (because many employers consciously or otherwise will be discriminatory in their hiring even if they think or say they are not) but feedback from students is the only way most universities can seriously address this requirement. Therefore, we suggest the following as the most effective way of assuring equal hiring opportunity:

1. Give extensive publicity about this legislation to students and employees.
2. Inform students that all claims of discriminatory hiring practices will be carefully reviewed.
3. Review all complaints in detail.



4. Take prompt action if complaints are legitimate; i.e., discussions, firm warnings, and withdrawal of assistance if necessary. Do not assist employers who discriminate and fail to respond to your requests for compliance.

We recognize one serious problem with our suggestion. Discriminatory hiring practices are extensive and firm action, like removal of assistance, is likely to cause a hardship for many students. But we do not know what else to say. If warnings do not end discrimination, the University is legally and morally responsible for taking action. This does not mean the University should not act diplomatically. Discussion, review of policy and law, and education of employers is practical and appropriate; but to be effective in ending patterns of discrimination, at some point, firm action must be taken.

As mentioned earlier there are a number of obvious and routine ways of obtaining the assurances of non-discrimination (not that we have a great deal of confidence in them). The convenient methods being letters, statements, and verbal assurances of non-discriminatory hiring practices. The problem with these methods is not only are they often unreliable, but they interfere with and can significantly delay the purpose of an employment assistance office-- finding jobs for students. This problem is particularly acute for small companies or individuals looking for part-time situations. A man looking for yard help does not have a prepared non-discrimination policy to send to the University and he should not be expected to. While it is possible that a routine statement read to people calling to post a part-time job is legally adequate, it is not very effective. Therefore, we re-emphasize our confidence in the process outlined earlier in this section and in the activities section.

One brief comment about the University as employer. The number of people acting as employers in the University is staggering. In many departments each faculty member has employees, particularly in the sciences. On most campuses it is unlikely that on-campus hiring can be coordinated effectively by one office. Therefore, we recommend that the policy emphasized for off-campus



employment be utilized on campus.

Some Hypothetical Questions

--If an individual representative of a company discriminates is the employer company responsible? Yes, but an isolated act by one individual should probably be treated differently than a pattern of discrimination by an entire company.

--If an employer discriminates and is denied assistance, when can the University resume giving aid? Each case must be handled differently, but as a general rule, if the company's chief executive officer states that discriminatory practices will cease that should be sufficient. In some cases it might be necessary to take additional affirmative steps, like talking to students who have been interviewed to determine what is occurring.

--Does the University or a university employee incur any risk if an employer is either accused of discrimination or is denied University assistance because of suspected discrimination? No, if a University employee investigates claims carefully and acts reasonably but makes a decision that later proves incorrect, the employee will not be personally responsible. Of course, all claims of alleged discrimination should be treated seriously and carefully.

--Does the University have a responsibility to report to HEW employers who discriminate? No.

--Are alumni "students"? Yes.

--Does the University have to obtain hiring statistics from companies? No, unless a claim is made against the company and more information is needed to evaluate its accuracy.

## 86.39 HEALTH AND INSURANCE BENEFITS AND SERVICES.

In providing a medical, hospital, accident, or life insurance benefit, service, policy, or plan to any of its students, a recipient shall not discriminate on the basis of sex, or provide such benefit, service, policy, or plan in a manner which would violate Subpart E if it were provided to employees of the recipient. This section shall not prohibit a recipient from providing any benefit or service which may be used by a different proportion of students of one sex than of the other, including family planning services. However, any recipient which provides full coverage health service shall provide gynecological care.

This section is somewhat easier to understand than many other sections of the regulations. There are, however, a number of words or phrases that may present present problems of interpretation.

### "PROVIDE"

When does the university "provide" a benefit or service? Clearly, all on-campus activities fall within the scope of the regulations. The Infirmary, University employed physicians, the approved University medical plan and all other on-campus services are provided by the University and as such has a responsibility to insure that the services do not discriminate on the basis of sex. There are, however, a number of more remote activities carried out by most University Health Services that raise more difficult questions about the degree, if any, of University responsibility.

For example, what responsibility does the University have for the discriminatory practices of a hospital, physician, or other service which it refers a student to? We think referral activity is a service and if "provided" or offered by a University, the University does have some degree of responsibility. In the absence of a specific requirement that the University "assure" itself (see Housing), it appears that the responsibility for off-campus situations is somewhat less than in the housing area. We see the universities responsibility limited to not making referrals to physicians, hospitals, etc., when the university knows that persons or agencies discriminate. We do not view the regulations as requiring affirmative action in the form of a review.

With respect to insurance, as already noted any "official" or "university approved" insurance program must not be discriminatory on the basis of sex. With respect to all program that find their way to the campus and to students, the University does not have an obligation to review them or insure that they comply with Title IX. The University is not "providing" a service in this context.

#### "FULL COVERAGE HEALTH SERVICE"

The regulations provide that if a University offers a full coverage health service the University must also offer gynecological care. We have been unable to arrive at a definition of full coverage health service that we feel comfortable with and urge that the Department of Health, Education, and Welfare, be requested to give more guidance here. Until a definition is provided the following definition of full coverage health service is suggested:

- A physician or physicians on duty to see and treat all student health problems to the extent that this service replaces the student's need to have their own General Practitioner.
- Nursing staff to assist physician(s).
- Emergency service.
- Bed space sufficient to care for short-term illness not requiring hospitalization.

#### "GYNECOLOGICAL CARE"

The regulations also require that if a full coverage health service is provided then gynecological care must also be available. The explanation in the supplement to the rules indicates that gynecological care includes basic services such as routine examinations, tests, and treatment.

#### HYPOTHETICAL QUESTIONS

--Is it discriminatory to offer sex and abortion counseling and information exclusively for women? Yes, if exclusively for women the service would be discriminatory. However, if these services are available to men but not used by them, the University is not precluded for offering such services. The

regulations permit you to offer services that may be used by a larger proportion of members of one sex.

--Is it discriminatory to provide a month's supply of birth control pills to women and not dispense condoms to men. Yes and No. If full coverage health service is provided (including gynecological care) and dispensing a month's supply of pills is normally part of gynecological care, (it is in the Raleigh area) then pills may be given to women without providing contraceptives to men. However, if the University does not offer full coverage health service or gynecological care but does dispense the pill, some male contraceptive device should be dispensed or the pill ought not be given to women.

--If birth control lectures are offered to women students on a regular basis, is it discriminatory not to offer regular such lectures to male students? Yes.

--Is it discriminatory to charge an additional fee, above required student health service fee, to female students who participate in a health service sponsored birth control counseling clinic? (The additional fee being for required laboratory procedures.) If the referred laboratory procedure is part of routine gynecological care, the fee would be discriminatory.

--Is it the responsibility of the University to offer a student a health and accident group insurance plan? No, you do not have to offer a plan; but if you do, it cannot be discriminatory.

--Is it discriminatory not to offer maternity coverage to single female students? Yes, see 86.40 (a).

--Why are female R.N.'s permitted to administer complete nursing care to male or female patients, while male R.N.'s are restricted in the type of nursing care which can be administered to female patients? We were unable to find any state law that prohibited male R.N.'s from attending to women patients; but if that happens to be the policy of your health service it

appears that when a male R.N is on duty a female R.N. would also have to be available so women could obtain equal service.



## 86.40 MARITAL OR PARENTAL STATUS

This is a broad, lengthy section dealing basically with pregnancy and related conditions and is the least complicated of the Student Affairs topics of this paper. Historically, the condition of pregnancy has resulted in any number of unfair rules and regulations evidenced primarily in the areas of admissions and athletics. For detailed discussion about guidance in these two areas, reference is made to particular sections dealing with those topics. Our analysis of Section 86.39--Health and Insurance Benefits and Services should also be reviewed for discussion of related topics.

- (a) Status generally. A recipient shall not apply any rule concerning a student's actual or potential parental, family, or marital status which treats students differently on the basis of sex.

A broad principle that is very clear and does not suggest any particular problem of interpretation or application.

- (b) Pregnancy and related conditions.

- (1) A recipient shall not discriminate against any student, or exclude any student from its education program or activity, including any class of extracurricular activity, on the basis of such student's pregnancy, childbirth, false pregnancy, termination of pregnancy or recovery therefrom, unless the student requests voluntarily to participate in a separate portion of the program or activity of the recipient.

Another statement that seems very clear. The University shall not exclude women who are pregnant or in conditions related to or effected by pregnancy from any program or activity unless the student voluntarily requests to participate in a separate program for pregnant students, if one is offered.

- (2) A recipient may require such a student to obtain the certification of a physician that the student is physically and emotionally able to continue participation in the normal education program or activity so long as such a certification is required of all students for other physical or emotional conditions requiring the attention of a physician.

It is permissible to require pregnant women to obtain a physician's statement that certifies that the student is able to participate in a particular program if other conditions normally treated by a physician are

handled in the same way. Basically, another way of insuring that pregnancy is treated like any other temporary disability.

- (3) A recipient which operates a portion of its education program or activity separately for pregnant students, admittance to which is completely voluntary on the part of the student as provided in paragraph (b) (1) of this section shall ensure that the instructional program in the separate program is comparable to that offered to non-pregnant students.

If a University has a separate program(s) for pregnant students, the program must be:

1. on a voluntary basis.
2. comparable to the program for non-pregnant students.

Aside from the comparability concept, which is somewhat unclear throughout the regulations but does not seem to be as much of a problem here, (probably because the likelihood of a separate program is small). This section is straightforward and easy to understand.

- (b) (4) A recipient shall treat pregnancy, childbirth, false pregnancy, termination of pregnancy and recovery therefrom in the same manner and under the same policies as any other temporary disability with respect to any medical or hospital benefit, service, plan or policy which such recipient administers, operates, offers, or participates in with respect to students admitted to the recipient's educational program or activity.

Section 86.39 is helpful here. The analysis of that section is virtually the same as this subsection. Pregnancy must be treated as other temporary disabilities are treated, in all insurance policies, by the Health Service and in all other services provided. The extent of the University responsibility for off-campus services being the same as in 86.39.

- (b) (5) In the case of a recipient which does not maintain a leave policy for its students, or in the case of a student who does not otherwise qualify for leave under such a policy, a recipient shall treat pregnancy, childbirth, false pregnancy, termination of pregnancy and recovery therefrom as a justification for a leave of absence for so long a period of time as is deemed medically necessary by the student's physician, at the conclusion of which the student shall be reinstated to the status which she held when the leave began.

If you have a "leave" policy for students, pregnancy must be treated as any other temporary disability. If you do not have a leave policy, you must permit a pregnant woman to take a leave of absence for as long as her doctor deems necessary. Further, the student must not be penalized for taking the leave of absence, other than the normal consequences for anyone taking a leave of absence for a temporary disability.

As already stated this is not an area where issues are easily identified. The rules seem direct and simple, pregnancy should not result in different treatment by the University unless the woman's physician or the woman herself thinks it is necessary.

General Administration Comments

Student Affairs Issues

1. Single-Sex Groups

As the NCSU paper points out, Title IX does not directly require that single-sex student groups stop discriminating, but only that those continuing to do so not receive "significant assistance" from the university. This concept is somewhat muddled by § 86.14(a), which as written exempts membership practices of social fraternities and sororities having tax-exempt status rather than university assistance to such groups, implying that otherwise they would be directly subject to Title IX. (Note that business, honorary, and professional fraternities and sororities are not "exempt"). As NCSU suggests, a good place to begin evaluating a group's membership practices is its charter; in the case of fraternities and sororities, it will also be necessary to secure current information on tax-exempt status.

The following discussion suggests guidelines for looking at "significant assistance" which hopefully will complement NCSU's thorough approach to the problems. They are meant to be useful regardless of whether the "assisted" activity seems to be "on-campus" or "off-campus," and so to help avoid having to choose between those statuses in looking at an activity.

First, material transmitted through any campus mail facility is simply beyond the reach of Title IX. Second, bulletin boards and other means of posting messages should not be censored or otherwise interfered with; to do so in a public institution could well constitute an unconstitutional abridgement of First Amendment rights. The only exception to this rule would be a notice for a meeting



or event, connected with the campus, which is itself barred by Title IX (see below); even here, policing bulletin boards may put a burden on campus authorities far out of proportion to the value of the "assistance." Third, where campus rooms or auditoria are generally available to groups with campus affiliations (formal or informal), a restricted group should be permitted their use on the same terms as all others -- if its meeting will be open without the restriction, and if that openness is not a sham. No group can use a room for a restricted meeting. The University has special obligations in making this distinction because its facilities are public ones. In general, however, a nominally single-sex group requesting meeting space may be presumed to be planning a closed meeting, in substance if not in form, until it demonstrates that the meeting actually will be open.

Perhaps a fourth distinction is that between private conduct and public or university-affiliated conduct. For example, a faculty member may not serve as adviser to a restricted group in his capacity as faculty member; he or she may do so privately. The prohibition should apply even where having an adviser is a "pro forma" requirement, and the advising function is an insignificant part of the faculty member's duties: such a requirement is but a part of university recognition of the group, and it is that process which is barred. Student groups may meet privately in private dormitory rooms, on any basis they select; they may not meet restrictively in public rooms, nor may their exclusionary conduct be allowed to take on a public character (e.g., by posting notices).



## 2. Assistance to Employers

Among the points in the NCSU discussion, two might be especially emphasized. First, assisting employers in contacting alumni, or vice-versa, is covered by s 86.38(a) just as assistance regarding students. Second, virtually any assistance rendered is subject to scrutiny under Title IX, including what might appear to be private efforts by faculty or administrators to secure applicants for particular employers or jobs for particular students/alumni. In addition, when a university undertakes one of those functions, or one of its faculty or administrators does, its conduct is also subject to regulation as an "employment agency" under Title VII of the Civil Rights Act of 1964. Among the requirements of that statute's implementing regulations is that a discriminatory job-order must be returned to the employer, who may be notified that it will be filled only with the restriction removed. Institutions of higher education have been sued successfully under Title VII for acquiescing in discriminatory treatment of their students by prospective employers, and so this area bears very careful attention.

## 3. Rules of Appearance

Section 86.31(b)(5) prohibits discriminatory application of rules of appearance: It is not clear whether H.E.W. means to require identical descriptive rules ("hair below the shoulders"), or to permit identical normative ones ("neat") having different physical results. In any event, as NCSU points out, this problem may only surface with clothing, where only normative rules will make any sense.

(ROTC appearance standards should be treated as exempt from this requirement insofar as they are national standards rather than ones promulgated by a particular campus unit; where the latter, equal norms should apply).

#### 4. Housing

As the NCSU discussion points out, the regulation's requirements as to off-campus housing need to be changed; that is one of the issues on which comment will be sought at the conference in order that President Friday may communicate with H.E.W. on behalf of all constituent institutions. With regard to on-campus housing, note that § 86.32's application to married students does not require that married-student housing be provided, but only that student-husbands and student-wives be treated identically in award of any such housing [§ 86.40(a)].

Housing policies reflect, obviously, supply and demand; compliance with the housing requirements should flow from these market forces in essentially the same way housing policies are set now where a campus tries to "follow the market." The regulation should not be read as an algebraic formula requiring that if 10% of the male units are air-conditioned singles, so must be 10% of the female units, or alternatively that if 40% of the women are housed on campus, so must be 40% of the men. Rather, it should be taken to call for comparable satisfaction of expressed student desires and needs--or put another way, satisfying comparable cross-sections of the desires of its male and female students as groups -- while guarding against differences which really are sex-based (e.g.,

simply assuming that males are really less interested in kitchen facilities than females).

5. Health Benefits

Section 86.39 prohibits discrimination in health and fringe benefit plans: note that consideration of a student's spouse's plan must be the same for husbands or wives, and that presumed "breadwinner" status must be irrelevant [§§ 86.40(a), 86.57(a)(2)]. It includes a requirement for gynecological care in full-service health plans.

Read in connection with the pregnancy provisions of § 86.40 and the employment provisions of § 86.57(c), this section clearly suggests that student health plans must provide pregnancy benefits. The Supreme Court is expected to decide this term whether employment plans must have pregnancy benefits, and its answer will dictate the viability of the requirement for students. In the interim, where cost factors will make inclusion of pregnancy impossible in new or changed plans, a decision on the plan should be postponed.

General Administration Review of North Carolina State University

Title IX Self-Evaluation Study

June 1976

General Comments

This review gives those persons who share in NCSU's Title IX responsibilities our comments on the Report prepared to demonstrate compliance with Title IX of the Education Amendments of 1972 and its implementing regulation, 45 CFR Part 86, as submitted May 5, 1976. The Report includes self-studies of various functional units (e.g., Schools), reviews thereof by the NCSU Title IX Advisory Committee, outlines for inquiries developed at compliance workshops, and statistical data and student surveys provided through the Division of Student Affairs/Planning and Research. Taken together, this material with some exceptions demonstrates thorough analysis and appropriate practices and policies; as the Advisory Committee notes, the efforts reported here form the basis for an ongoing focus on specific areas where a need for change has been identified, and on expanding attitudinal commitments to the goals of Title IX. For the sake of brevity we have concentrated here on such future activities and not commented extensively on issues which have already been resolved; if this review therefore has a questioning tone, that should not detract from the very real successes which the Report presents.

We hope these comments will provide a useful framework for defining activities following the initial year of self-evaluation which ends on July 22, 1976. Many important specific activities are already called for in the self-evaluation, and shall be undertaken. Accompanying this review is a separate memorandum to all Title IX officers which discusses monitoring and other activities which may be needed generally at all institutions.

### Admissions and Recruitment

The Unit and Advisory reports both look carefully at undergraduate admissions, and we concur in the Advisory Committee's recommendations in this area. Particularly, as enrollment limitations require greater selectivity it will be increasingly important to assure that the UPGA regression equation does not predict differentially for males and females. The Advisory recommendations for more coordinated undergraduate recruitment should maximize the effect across the various Schools of all recruitment activities, and should also enhance individual School efforts through the exchange of recruiting information among the Schools. The Advisory recommendations for collecting data on graduate admissions and financial aid are important because the Schools' reports in this area are less comprehensive than the undergraduate evaluations, as noted below in the individual School discussions (e.g., they fail to evaluate applicant/acceptance ratios against significant criteria such as the GRE).

### Financial Aid

The undergraduate Unit report is a thorough and clear discussion, particularly as to the pattern of awards and as to the nature and use of financial aid restricted on the basis of sex, and received a thorough Advisory review. Together with the Business Affairs recommendations, the Advisory proposals for student employment should help assure that this sprawling activity is monitored effectively.

Because aid to graduate students is not centrally administered, the Graduate Unit report on such aid is less conclusive; the Advisory review notes that it was not always possible to assess amounts or types of aid awarded, even



where numbers of recipients were available. It is important to document explanations for possible disparities in the award of financial aid, so that they are not merely hypotheses but are confirmed by the facts, especially: relating low ratios of fellowship awards to women to low enrollment of women in disciplines having substantial fellowship resources, applying tuition remission standards similarly to men and women, and distributing graduate assistantships nondiscriminatorily (in terms of both amounts and duties). The Advisory recommendations will be helpful in these areas.

#### Faculty Employment

As the Advisory review notes, the Unit reports suggest progress in attracting women faculty but also raise questions of salary differentials between men and women. While both of these issues are also relevant to the University's affirmative action plan under Executive Order 11246, recruitment might be usefully approached in connection with other issues concerning students, as discussed below under Academic Programs.

#### Academic Programs Generally

The School and other Unit reports and the Advisory recommendations show that many participants in the Title IX process desire further review and more clearly defined changes. For a number of reasons, we think that such activities may be more efficient and effective when embodied in a systematic approach to

the experience of all women within any School, as students, faculty and non-faculty employees, bringing varied perspectives together to set out coordinated, complementary objectives.

Where women have had low participation in a discipline, whether as undergraduate or graduate students or as faculty, efforts to recruit them and to assure their equal consideration may be dissipated if they are not followed during matriculation and employment with supportive advising and counseling. The academic experience is not a set of unrelated processes, but rather a sequence of activities which have a cumulative effect on a student's or faculty member's success; thus change in that experience is best considered as a whole. Similarly, questions of attitude or commitment may be considered most productively (and least abrasively) in terms of a School community's overall goals and processes--in contrast to, e.g., a focus on "discriminatory counseling" which may create a narrow and adversary context. Finally, as the School and Advisory reports suggest, there are certain areas in which further data should be collected to answer specific questions about admissions or financial aid; that is done more efficiently within a comprehensive process than through separate or isolated inquiries.

In this regard, it is useful to recall that the Career Planning and Placement Unit report and both the Academic Programs and Student Services Advisory reports emphasize the fundamental importance of academic and other counseling, within both the department and the School, in assuring nondiscriminatory treatment of men and women. Similarly, the student survey results stress the importance

of faculty conduct in determining student perceptions and decisions. While the School reports do address this issue in a variety of ways, an integrated approach within a particular School, such as we have been describing, would help make clear the extent to which faculty relationships with students can produce positive results, i.e., from the initial contact with a prospective applicant through the graduating doctoral student's consideration of a faculty job.

#### Individual School Reports

This section outlines what we think are the specific strengths of the various School reports, as well as those areas wherein we think further analysis would be useful, in light of the Financial Aid, Admissions, and Academic Programs discussions above.

- Agriculture and Life Science: This is a forthright report, which recognizes and has begun to address the need for open attitudes as well as formally correct practices, and which shows important changes in enrollment of women. To the extent enrollment in this School as an undergraduate or graduate student is looked on as a step toward a further role as a graduate student or faculty member, an excellent opportunity exists to attract proven female graduate and faculty applicants and to emphasize to potential undergraduates the "ladder" of careers which A. & L.S. provides. Because A. & L. S. operates an extensive placement service, it would be useful for that service to have monitoring procedures similar to those of the Department of Career Planning and Placement. (See the Student Services Advisory.)

- Design: We recommend that the School complete the admissions and financial aid analyses described for the various undergraduate and graduate

programs. The Landscape Architecture discussion at page 15 provides a useful example of comparison with national trends.

- Education: The admissions and financial aid analyses in this report are generally clear, although it would be useful to explain recent fluctuations in undergraduate psychology (e.g., in comparison with national trends). Placement monitoring is essential for education programs, particularly where there are the number and breadth of placements involved here, and the report does not describe such monitoring in any detail (e.g., Curriculum and Instruction, pp. 8 and 18; Mathematics and Science, p. 10; Psychology, p. 12; Graduate Guidance, p. 18). Where doctoral applicants or internship nominees are made from outside agencies, as in the Adult/Community program, those agencies should clearly understand that discrimination in their selection processes is incompatible with the spirit of the School's operation. The School's summary recommendations are very thorough.

- Engineering: This report is under development by the School.

- Forestry: This is a clear, complete report of a School apparently leading changes in its field.

- Liberal Arts: The "general problems" section of this report gives a good cross-section of the kinds of problems which we believe "School-wide" approaches might usefully address. We would recommend specific analysis of departmental graduate admission and financial aid patterns, as the report contains very little information as to what inquiries were made in these important areas.

- Physical and Mathematical Sciences: This report has clear reviews of both undergraduate and graduate admissions profiles and of the relationship between graduate enrollment and teaching assistantships; further analysis is needed for tuition remissions and fellowships. Where enrollment patterns have been static, it would be useful to consider whether recruiting and counseling activities might make more positive contributions to enrollment of women.

- Textiles: The admission results presented here show increasing enrollment of women; the information would be more useful if presented with discussions of national trends, application rates, or some other benchmark for comparing the School's results. Because the School's placement service is extensive and extremely important for both students and employers, it is important for it to have monitoring procedures similar to those of the Department of Career Planning and Placement (See the Student Services Advisory).



### Student Services

Unit reports in this area were comprehensive, and the Advisory reviews drew clear and specific conclusions. With reference to the Student Center discussion of musical organizations, we would note that the Title IX regulation permits singing groups which are organized on the basis of vocal range or quality to have a membership of only men or women where no members of the other sex meet the voice criterion, but it does not permit such groups to uniformly exclude men or women on the presumption that no member of that sex will meet the criterion.

### Physical Education, Intramural Athletics, and Intercollegiate Athletics

These activities take place under the aegis of different units and were addressed in different Unit and Advisory reports; they are all addressed here so that related issues may be considered together.

The Department of Physical Education report has an extensive discussion of the related problems of classifying sports as "contact" sports and of fairly grading men and women enrolled together in a single course. The report proposes that "(in a)ny activities in which serious injury could occur due to the equipment, skill level, speed, or force of the sport, we feel separate classes should be offered." (page 5). This premise may be consistent with the regulation's definition of a "contact" sport--one wherein the purpose or major activity involves bodily contact--but it is not clear that this is so. It does not appear that the Department has had to apply its definition to any sport not already cited by the regulation as a contact sport; in the event it should do so, care should be taken

that the criteria applied meet that of the regulation.

A more difficult and immediate question is that of separate PE 100 courses, as to which the Academic Programs Advisory has a useful recommendation. The issues here, as explained in the Physical Education Report, are the effect of physical differences between men and women generally on activity, performance, and grading (pages 1, 3, and 6). In this regard the regulation permits grouping of students "by ability as assessed by objective standards of individual performance developed and applied without regard to sex", "where use of a single standard of measuring skill or progress . . . has an adverse effect on members of one sex," it requires development of "appropriate" standards which do not have such an effect (45 C.F.R. 86.34(b), (d)). But the regulation does not permit separate non-contact classes for men and women; rather, it seems to contemplate integrated classes with standards based on performance in light of physical capabilities. Inasmuch as virtually all other non-contact classes appear to be coeducated, we believe the Department will be called on to demonstrate that it has considered and rejected a variety of specific alternatives for PE 100, and thus that its conclusions as stated in the report will not be sufficient. (The gymnastics discussion on page 3 does not clearly state whether courses are open to both sexes, but structured with regard to the typical pattern of events for those sexes, or whether they are in fact separate; in line with the preceding discussion, we believe the regulation does not permit separate gymnastics classes.)

The intramural discussion of refereeing cites potential difficulties in assigning referees familiar with rules used by one sex to games involving contestants of the other sex. This problem should be addressed in ways which do not disqualify anyone based on his or her sex, e.g., by testing proficiency in the rules to be applied in a particular contest.

The Intercollegiate Athletics report is clear and comprehensive, and cites a number of specific changes. Our comments reflect our belief that the University's commitment to equality could be communicated more effectively in certain respects, as follows:

1. The report has a good deal of information concerning coaching. We would recommend a full review from two perspectives: equality of opportunity for those who receive coaching, and employment opportunities for coaches as employees--addressing from both views the amount of time available for coaching, released time, summer responsibilities, qualifications and expertise, and compensation. It is important to recall here that women's teams should not automatically receive women's coaches, and vice-versa.

2. It appears to us that the effect of AIAW limitations on NCSU's women's program could usefully be addressed by NCSU directly to the AIAW.

3. The grants-in-aid discussion at page 9 states that NCSU "uses the same basic criteria for the women's recipients as it does for the men . . . . athletes who can help build a successful team or program and who show promise of becoming conference, regional, or national class athletes." The discussion also notes a tripling of grants-in-aid to women in the coming year. We recommend

that NCSU adopt specific procedures by which it can assure itself that its award of aid under the criteria just quoted does comply with the regulation, as is intended, in terms of numbers and amounts of awards in comparison to those going to males. Clear internal monitoring procedures will be extremely valuable in demonstrating to compliance officers and to other interested parties that institutional discretion has been properly exercised.

4. In addressing the "materiel" aspects of athletics, NCSU should be prepared to demonstrate that its commitment of resources will support growth of women's athletics (as appears to be the case). It is particularly important that travel funds be available to expand scheduling to the national caliber and breadth of many men's teams (a process begun in, e.g., women's basketball), and that a clear and early commitment be made to a specific plan for assuring appropriate women's facilities by July 1978. The latter is clearly a difficult and costly problem which we recommend have the highest and earliest priority.

5. Finally, as a compliance matter, the growth of women's athletics must be measured not only on its own terms but also in comparison to men's athletics. The NCSU report would be more definitive if it developed such a comparison, focusing on interest and commitment (as has been done in surveys of potential women competitors), and on potential growth of its programs in light of those women currently in secondary schools who will be competing after the July 1978 transition deadline.

### Non-Faculty Employment

The Advisory report in this area rightly notes the difficulty of comparing Unit reports which reflect differing concerns and approaches of various Schools and offices. Its recommendations are useful in this regard in that they would provide for greater sharing of information among Schools and for more refined analysis of what kinds of numerical data are important. The Unit reports address in various ways the need for positive efforts to assure the absence of job stereotyping as to "suitable" employment for men or women, and to attract qualified male or female applicants for jobs in which one sex's participation has traditionally been limited. Useful efforts include especially the actions and recommendations in the Library report, including workshops, distribution of material to individual employees, and surveys, and the specific recommendations in the Business Affairs report for advertising and monitoring "trade" apprenticeships, and for clearer practices in trainee, temporary, and student employment with which many hiring offices are concerned.



# NORTH CAROLINA STATE UNIVERSITY AT RALEIGH

SCHOOL OF AGRICULTURE AND LIFE SCIENCES

ACADEMIC AFFAIRS, EXTENSION & RESEARCH

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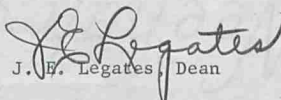
October 22, 1973

MEMORANDUM TO: Administrators and Department Heads, SALS  
SUBJECT: Affirmative Action Recruitment Procedures - EPA Personnel

Our University Affirmative Action Plan submitted to HEW specifies certain procedures which must be followed in the recruitment of EPA personnel. Although full HEW approval has not been received, the steps proposed in the University Plan as submitted should become a part of your recruitment program. If there are changes in the University Plan when approved by HEW, these will be transmitted to you as they become available.

The following represent steps which all units of the University must be able to show that they take in recruitment.

1. Use of Equal Employment Opportunity slogan on all descriptions of vacancies.
2. Advertise the vacancies in ways that would reasonably lead to application by minorities and females.
3. Review files of previous applications to determine if qualified minorities or females are in these files.
4. Notify through official communication potential candidates on campus who may wish to be considered for the vacant positions.
5. Explain why the final candidate was chosen by means of an explicit comparison with other individuals considered.
6. Maintain complete records of the search process including correspondence with these candidates who decline, withdraw or are not offered the position.
7. Keep all applications on file for a period of two years.

  
J. E. Legates, Dean

JEL:rcr  
cc: SALS Affirmative Action Committee  
Mr. W. H. Simpson

North Carolina State University at Raleigh is a constituent institution of The University of North Carolina.