



Overview of Affirmative Action Programs

Plan Year: November 1, 2021 - October 31, 2022

**MORNINGSIDE CAMPUS
MANHATTANVILLE CAMPUS
COLUMBIA UNIVERSITY IRVING MEDICAL CENTER
LAMONT-DOHERTY EARTH OBSERVATORY**

OFFICE OF EQUAL OPPORTUNITY AND AFFIRMATIVE ACTION

I. INTRODUCTION

As an institution, Columbia is committed to the principles of equity and excellence. It actively pursues both, adhering to the belief that equity is the partner of excellence. In furtherance of this commitment, Columbia's Non-Discrimination Statement and Policies seek to ensure that all employment decisions are based on individual merit and not on bias or stereotypes. Columbia is also committed to a workforce of faculty and staff that reflects the diversity and talent of New York City, the larger metropolitan area, and the nation.

Handinhand with its Non-Discrimination Statement and Policies and with its commitment to diversity are Columbia's affirmative action obligations. As a recipient of federal government contracts, Columbia is subject to:

- Executive Order 11246
- Section 503 of the Rehabilitation Act (Section 503)
- Vietnam Era Veterans' Readjustment Assistance Act of 1974 (VEVRAA)

Each has a non-discrimination element and an affirmative action element, requiring that federal government contractors:

- not discriminate against any employee or applicant for employment because --
 - (i) "of race, color, religion, sex, sexual orientation, gender identity or national origin";
 - (ii) "of physical or mental disability in regard to any position for which the employee or applicant for employment is qualified"; or
 - (iii) "he or she is a disabled veteran, recently separated veteran, active duty wartime or campaign badge veteran, or Armed Forces service medal veteran (hereinafter collectively referred to as 'protected veteran(s)') in regard to any position for which the employee or applicant for employment is qualified".
- take affirmative action --
 - (i) "to ensure that applicants are employed, and that employees are treated during employment, without regard to their race, color, religion, sex, sexual orientation, gender identity or national origin"
 - (ii) "to employ, advance in employment and otherwise treat qualified individuals with disabilities without discrimination based on their physical or mental disability in all employment practices"; and
 - (iii) to employ, advance in employment and otherwise treat qualified individuals without discrimination based on their status as a protected veteran in all employment practices".

The U.S. Department of Labor's implementing regulations to Executive Order 11246, Section 503, and VEVRAA each require that government contractors maintain written Affirmative Action Programs.

For over three decades, Columbia has maintained and has annually updated Affirmative Action Programs. Today, such Programs are maintained for each of its four Campuses -- the Morningside Campus; the Manhattanville Campus; the Columbia University Irving Medical Center; and the Lamont-Doherty Earth Observatory.

II. WHAT IS AN AFFIRMATIVE ACTION PROGRAM?

The central premise underlying affirmative action is that "absent discrimination, over time a contractor's workforce, generally, will reflect the gender, racial and ethnic profile of the labor pools from which the contractor recruits and selects." 41 C.F.R. § 602.10(a). As such, an Affirmative Action Program is "a set of specific and result-oriented procedures to which a contractor commits itself . . . to achieve prompt and full utilization of minorities and women at all levels and all segments of the workforce where deficiencies exist." A Program is to contain a Narrative component and a Numbers component.

Note: The maintenance of an Affirmative Action Programs is required by law, and should not in any way be construed as an admission of a violation of any applicable federal, state, or local statute or regulation. An Affirmative Action Program also does not constitute an express or implied contract between a federal government contractor and any employee or applicant for employment.

III. THE AFFIRMATIVE ACTION PROGRAMS UNDER EXECUTIVE ORDER 11246

The Narrative component of Columbia's Executive Order 11246 Programs include an overview of Columbia's operations at the Campus, a summary of its non-discrimination, diversity, and affirmative action policies and commitments, and a description of the Action-Oriented Programs designed to achieve the commitments made. The Numbers component includes analyses designed to compare the composition of the workforce to the labor pools, both internal and external, from which employees are recruited and selected. They include:

A. Job Group Analysis

The first step in the comparison of the representation of Women relative to Men and of Minorities relative to Non-Minorities in the workforce is a Job Group Analysis. Such an Analysis involves the combining of Job Titles with similar content, wage rates, and opportunities -- into a Job Group. Among the relevant factors that should be taken into account when establishing Job Groups are: (i) the duties and responsibilities of jobs; and (ii) the training, transfers, promotions, pay, mobility, and other career opportunities.

Columbia's Job Group Analyses for its four Campuses are summarized as follows:

- **Officers of Instruction** -- There are up to six Job Groups for each Academic Department and/or School. They are: (i) Tenured Faculty; (ii) NonTenured / Tenure Track Faculty; (iii) Practice Faculty; (iv) Clinical Faculty; (v) Special Instructional Faculty; and (vi) Adjunct Faculty.
- **Officers of Research** -- There are up to six Job Groups for each Academic Department and/or School. They are: (i) Senior Research Scientist; (ii) Research Scientist; (iii) Associate Research Scientist; (iv) Postdoctoral Research Scientist; (v) Staff Associate; and (vi) PartTime Officer of Research.
- **Officers of the Libraries** -- There are up to six Job Groups: (i) University Librarians; (ii) Library Directors; (iii) Library Department Heads; (iv) Library Archivists; (v) Library Specialists; (vi) and Library Catalogers and Curator.
- **Officers of Administration and the Support Staff** -- The Job Groups follow the Integrated Postsecondary Education Data System Occupation Categories:
 - Management Occupations
 - Business and Financial Operations Occupations
 - Computer, Engineering, and Science Occupations
 - Community, Social Service, Legal, Arts, Design, Entertainment, Sports and Media Occupations
 - Librarians, Curators, and Archivists
 - Student and Academic Affairs and Other Education Services Occupations
 - Healthcare Practitioners and Technical Occupations
 - Service Occupations
 - Office and Administrative Support Occupations
 - Natural Resources, Construction, and Maintenance Occupations
 - Production, Transportation, and Material Moving Occupations

Within the above Categories, the Job Groups are then aligned by responsible University Officer, by Administrative or Academic Unit, or by Job Title.

B. Availability Analysis

The next step is an analysis of the availability of women and minorities for jobs in each Job Group. For purposes of this analysis, there is a two-factor test:

- The first factor is a determination of External Availability or "the percentage of women or minorities with requisite skills in the reasonable recruitment area."
- The second factor is a determination of Internal Availability or "the percentage of women or minorities among those promotable, transferable, and trainable within the contractor's organization."

For the determination of External Availability, Columbia has used current and discrete statistical information derived from 17 different sources, including the Survey of Earned Doctorates - Doctorate Data Project: Research Doctorates Awarded to United States Citizens and Permanent Residents By Race / Ethnicity, Sex, and Fine Field (1986-2019), a publication of the National Opinion Research Center at the University of Chicago; the Association of American Medical Colleges Faculty Roster, December 31, 2020; the Association of Research Libraries Annual Salary Survey, 2017-2018; and data published by the United States Census Bureau -- on a national basis and/or on a New York PMSA basis, depending on the Job Group. For the determination of Internal Availability, Columbia has assessed which Job Groups are "feeder pools" for movement to higher level Job Groups.

There are inherent limitations in any determination of availability. For example, based on raw census or survey data alone, Columbia would have no knowledge of individual qualifications, or whether the individual would have an interest in working at Columbia or would be a suitable match for employment.

c. Establishing Placement Goals

The final step is to compare the percentage of Women and the percentage of Minorities in each Job Group with the rates of availability of Women and Minorities for those Job Groups. Where the percentage of Women or Minorities is less than what would reasonably be expected given their availability, a Placement Goal is to be established.

In making this comparison, Columbia has used the "80 percent" method, one of three methods permitted by the applicable regulations, with the application of the "whole person" rule. Under this method, when the incumbency rate of Women and/or Minorities in a Job Group is less than 80% of the availability rate and the shortfall is equal to at least one whole person, a Placement Goal is set.

For the November 1, 2021 - October 31, 2022 Executive Order Programs, and based on the above methodology, Columbia has established Placement Goals as follows:

Campus	# of Job Groups	GENDER		RACE / ETHNICITY	
		# of Job Groups with Placement Goals as to Women	% of Job Groups with Placement Goals	# of Job Groups with Placement Goals as to Minorities	% of Job Groups with Placement Goals
Morningside Campus	458	78	17.03%	49	10.70%
Manhattanville Campus	59	6	10.17%	6	10.17%
Columbia University Irving Medical Center	309	32	10.36%	29	9.39%
Lamont-Doherty Earth Observatory	24	6	25.00%	8	33.33%

A Placement Goal is not a quota. The federal government's position is clear: "The person best qualified for the position is the one who should be placed in the job without consideration of race or sex." The applicable regulations further detail the principles that must be followed when Placement Goals are established:

- Placement Goals may not be rigid and inflexible quotas that must be met, nor are they to be considered as either a ceiling or a floor for the employment of particular groups;
- Placement Goals are not used as a justification to either extend a preference to any individual, or to select an individual or to adversely affect an individual's employment status on the basis of that individual's race, color, religion, sex, or national origin;
- Placement Goals may not create set-asides for specific groups, nor are they intended to achieve proportional representation or equal results; and
- Placement Goals may not supersede merit selection principles.

The federal government contractor's principal obligation is to utilize "Good Faith Efforts" to achieve the Executive Order Placement Goals.

Consistent with the regulatory requirements, Columbia has established its Placement Goals as objectives or targets reasonably attainable by means of applying every good faith effort to make all aspects of its Programs work.

Whether a Placement Goal is met will depend on opportunities -- as measured by the openings for a hire/appointment or a promotion during the year. In some Job Groups, mostly at the Tenured rank of Officers of Instruction, there is little attrition and, thus, fewer opportunities to meet a Placement Goal. In other Job Groups, there are greater opportunities and the developed initiatives have served Columbia well in having a relatively small percentage of Job Groups with Placement Goals. In any case, as part of its Affirmative Action Programs and, also, as part of its commitment to equal employment opportunity and to diversity, Columbia has developed many Action-Oriented initiatives that are designed to attain established goals and objectives and to foster an inclusive working environment where all can thrive.

IV. THE AFFIRMATIVE ACTION PROGRAMS UNDER SECTION 503 AND VEVRAA

The regulations to Section 503 and VEVRAA each require the maintenance of a written affirmative action program. The Narrative component for both consists of:

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| (a) Policy Statement | (g) Internal Dissemination of Policy |
| (b) Review of Personnel Processes | (h) Audit and Reporting System |
| (c) Physical and Mental Qualifications | (i) Responsibility for Implementation |
| (d) Reasonable Accommodation | (j) Training |
| (e) Non-Harassment | (k) Data Collection Analysis |
| (f) External Dissemination of Policy | |

There is also a Numbers component. Under the implementing regulations to Section 503, contractors are required to set a Utilization Goal of 7% for the employment of Individuals with Disabilities in each of its Job Groups. Under the regulations to VEVRAA, the federal government has set a Benchmark for Hiring of Veterans. The current Benchmark is 5.6% meaning that such percentage of the individuals appointed or hired during the Plan Year should be a Protected Veteran. The Benchmark is applied on an overall Campus basis -- and not by Job Group.

Neither the Utilization Goal nor the Benchmark for Hiring is a quota. The applicable regulations provide that: "The utilization goal [or the benchmark for hiring] is not a rigid and inflexible quota which must be met, nor is it to be considered either a ceiling or a floor for the employment of particular groups. Quotas are expressly forbidden."

The Section 503 / VEVRAA Programs for each of the four Campuses are, as required by law and except for the Numbers component, available for review in the Office of Equal Opportunity and Affirmative Action.

V. MONITORING OF PROGRESS

The Affirmative Action Programs are not a paperwork exercise. Rather, the progress in meeting Placement Goals, Utilization Goals, and Benchmarks for Hiring is monitored throughout the year by Columbia's Office of Equal Opportunity and Affirmative Action. Stakeholders in the Administrative and Academic Units on each Campus are informed of progress. Ultimately, responsibility for the administration of Columbia's equal opportunity, non-discrimination, and affirmative action policies and procedures rests with the Managers and Supervisors in each Unit. A collective effort is required to assure that Columbia's commitments are fulfilled.