2021 Affirmative Action Plan Training
for Departmental Administrators

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Template to be modified for each School/College/Area

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Agenda

- AAP at MIT - Overview
- Placement Goals and How to Address Them
- DLC Administrators’ Responsibilities
For today, we’re going to address only women and minorities.

**Affirmative Action at a Glance (part 1)**

- In order to **address long-standing inequities**, it’s not enough just to try to act without bias; rather, **proactive steps** (affirmative actions) are required to **ensure equal employment opportunities**.

- Federal contractors are required annually to **plan and carry out Affirmative Actions** to provide equal opportunities

- Affirmative Action plans are required to address equal opportunities based on:
  - Sex
  - Ethnicity/race
  - Veteran status
  - Disability status
The Importance of Affirmative Action Compliance

- Not only does Affirmative Action support the Institute’s own diversity values, but...
- MIT is due for an OFCCP audit of our Affirmative Action plans soon. Any negative findings could lead to
  - Bad publicity
  - Fines and increased oversight
  - Ultimately, loss of government contracts.
Job groups are created across the whole Institute. Not every School/College/Area has employees in every job group.

[Each School/College/Area has its own way of defining the role of DLC Admins. In some cases, the AAP Administrator provides each DLC’s Administrator with the actions they should carry out. In other cases, each DLC Administrator determines the actions they’ll carry out and submits those plans.]
We’re about to define these terms.
On a later slide, you’ll be able to see which placement goals are relevant to your DLC.

DLC Admins’ Responsibility: Address Relevant Placement Goals

If any job group that’s represented in your department has a placement goal,

you’re responsible for [planning and] carrying out the actions, or **good faith efforts**, that your DLC will take to address it.

[Customize for each School/College/Area.]
What is a Placement Goal?

- For every job group, we compare the % of women in
  - our current workforce vs
  - the population of qualified potential applicants, internal & external.
- Where there’s a statistically significant difference, the job group is subject to a **placement goal for women**.
- Placement goals can also exist for **minorities** (as a group) and **each racial group** separately.

The population of qualified potential applicants is a combination of some or all of the following:

- MIT employees in “feeder” job groups, who could be promoted into the job group
- People in the relevant geographic area who indicated in the last US Census that their occupation falls into this job group
- Recent recipients of relevant degrees
What must happen when there’s a Placement Goal?

Where a job group is subject to a placement goal, we must:

- aim to hire & promote members of that protected group (e.g., women) into the job group at a rate matching their % of the qualified pool,
- plan and carry out actions (good-faith efforts) to address every placement goal, and
- review the effectiveness of past good-faith efforts, making changes as needed.

It’s not in “good faith” to repeat the same, ineffective actions year after year.
Self-identification is optional.
• We are required to take actions to make achieving the goal likely; we are not out of compliance if we fail to reach the goal.

• While you are probably aware of these points already, hiring managers and their higher-ups may not be, and since they’re under great pressure to hire women and minorities, so they may misinterpret this as a mandate for preferential treatment.

• Parts of the Affirmative Action reports that we aren’t discussing today will catch preferential treatment, by looking for disproportionate treatment of either sex and any race.

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Key Facts About Placement Goals

• They serve as objectives and targets for hiring and promotion
  They are not quotas and do not create set-asides

• They are intended to bring our demographics in line with the qualified pool over the course of years
  They are not targets for the workforce demographics in one year

• They are to be addressed through
  – recruiting/attracting qualified applicants in protected groups and
  – removing bias from the hiring process
  They do not justify preferential treatment
  – The most qualified candidate must still be hired
“Good Faith Efforts” to address a Placement Goal aim to:

- increase the number of qualified female or minority applicants (external and internal), e.g.,
  - Targeted advertising or recruitment at specific events
  - Outreach to Employee Resource Groups
  - Training programs for employees in promotable groups

- and/or remove bias from the hiring process, e.g.,
  - Training hiring managers
  - Removing identifying information from resumes

Good-Faith Efforts are actions, not outcomes (e.g., “Hire two women”)
The most effective Good Faith Efforts address the specific situation. For instance,

- recruiting additional qualified women to apply will not help much if the hiring manager resists hiring someone who might need maternity leave, while
- training hiring managers won’t help much if postings are not reaching qualified minorities in the field.
DLC Admins’ Responsibilities for Good Faith Efforts (1)

1. Identify which of your School/College/Area’s Placement Goals apply to your DLC
   – This is based on whether you have any employees in any of the Jobs in a Job Group.
   You’ll also need to know which jobs are included in each Job Group.
   – See the next two slides...
Placement Goals in [School/College/Area], w/the Relevant DLCs

<table>
<thead>
<tr>
<th>Job Group</th>
<th>Sex</th>
<th>Race</th>
<th>Lab A</th>
<th>Lab B</th>
<th>Center C</th>
<th>Lab D</th>
<th>Dept E</th>
<th>Center F</th>
<th>Dept G</th>
<th>Lab H</th>
<th>Dept I</th>
<th>Dept J</th>
</tr>
</thead>
<tbody>
<tr>
<td>3C Acad-Resch (incl. Postdocs)</td>
<td>Women</td>
<td></td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>3T Resch Sc, Eng, Assoc</td>
<td>Minorities, Asians</td>
<td>x</td>
<td></td>
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<td>x</td>
<td>x</td>
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<tr>
<td>3U Resch Spec, Tech Asst/Assoc</td>
<td>Women</td>
<td></td>
<td>x</td>
<td>x</td>
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<td></td>
<td>x</td>
</tr>
<tr>
<td>5T Admin &amp; Office Mid level</td>
<td>Women</td>
<td></td>
<td>x</td>
<td>x</td>
<td>x</td>
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</tbody>
</table>

- The following departments have no employees in any job groups that are subject to placement goals:
  - X Lab
  - Y Department
  - C Center
Jobs in each Job Group

- A list of job titles that fall into each Job Group is available in this Cognos Report at reports.mit.edu:
  
  Public Folders >
  School & Area Reports >
  HR >
  Community >
  Affirmative Action Jobs and Job Groups

- If you have trouble running this report, write to diversity-data@mit.edu
DLC Admins’ Responsibilities for Good Faith Efforts (2)

[NOTE: This slide is included only if DLC Admins are asked to generate their own Good Faith Efforts]

2. Design Good Faith Efforts (GFEs) to address the relevant Placement Goals
   - Only one GFE is needed to cover all the potential job openings in the whole Job Group
   - One GFE may address more than one goal
   - Every placement goal must be addressed by at least one GFE.
   - Keep GFEs brief - no need for detail
     - Auditors will expect you to have carried out whatever you recorded, so leave yourself room to adjust the details as you carry out your plans.
     - 255 characters max
DLC Admins’ Responsibilities for Good Faith Efforts (3)

3. Carry out the Good Faith Efforts [that your School/College/Area’s AAP Admin specifies] to address the relevant Placement Goals
   – Where relevant, include these in the search plans for any openings in the Job Group.
   – Ensure that hiring managers are aware of all relevant Placement Goals and Good Faith Efforts
   – Continue working on these Good Faith Efforts until the next year’s Placement Goals are announced

4. Before creating next year’s GFEs in the Spring of 2022, we will ask you to update and document this year’s GFEs
   – If you did have an opening in this job group, you’ll provide some type of digital evidence that you took the action, such as an invoice, a copy of an ad, an email, a photo of a job-fair badge, etc.
Resources from the VP of Human Resources

- See the “Hiring Process Overview” page on HR’s website:

https://hr.mit.edu/managers/hiring/process

A few highlights include:

- Advertising and diversity outreach section:
  - Diversity Posting Guide
  - Tips for outreach

- Screening, interviewing, and ensuring bias-free hiring decisions section:
  - Courses on bias-free hiring and interviewing taught by Staffing Services
Recap: DLC Admin Responsibilities for Good Faith Efforts

1. Identify which Placement Goals, if any, apply to your DLC
   - If none apply, you are done.

2. [Customize for each School/College/Area:]
   - Review the Good Faith Efforts that your AAP Administrator will provide for each Placement Goal, OR
   - Develop Good Faith Efforts for all relevant Placement Goals, if any, and submit them by [add method and deadline]

3. Carry out the Good Faith Efforts until...

4. A year from now, we’ll ask you for an update

Remember: Keep the text for a GFE under 255 characters.
Thank you for your time and efforts

If you have questions or find problems, contact either

- [School/College/Area AAP Administrator] or
- Riley Hart and her colleagues at diversity-data@mit.edu