Affirmative Action Plan for Veterans and Individuals with Disabilities
2014-2015

Office of Institutional Diversity and Inclusion
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(401) 863-2216

Approved by:

Liza Cariaga-Lo
Vice President for Academic Development, Diversity and Inclusion
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The 2014-2015 Affirmative Action Plan for Minorities and Women is available for viewing online at the website for the Office of Institutional Diversity. The document is also available for viewing in hard copy, upon request, at the following locations: University Human Resources, Office of the Provost, Public Affairs and University Relations, Office of Institutional Diversity, Office of the General Counsel, and all University Libraries.
A. BROWN UNIVERSITY’S COMMITMENT AND STRATEGIC PLAN

The purpose of Brown University’s affirmative action program is to create and implement a set of positive steps to promote equal employment opportunity, and to eliminate unlawful discrimination. It includes expanded outreach, recruitment, mentoring, training, management development, and other programs designed to help Brown hire, retain, and advance qualified workers from diverse backgrounds.

Brown University is committed to affirmative action and fair employment. We believe in giving everyone an opportunity to succeed. We are committed to principles of fairness and respect for all. Each year we prepare and maintain an Affirmative Action Plan (AAP) in accordance with federal regulations. The process of completing this plan gives us an opportunity to review our institutional policies and review our commitment to diversity and inclusion.

On October 26, 2013, the Brown University Corporation approved *Building on Distinction: A New Plan for Brown*. The strategic plan supports Brown’s Affirmative Action Plan, and asserts that all members of the Brown community must be culturally aware and adept.

In support of the strategic plan and Affirmative Action Plan, Brown University creates a climate that is favorable to the free and open exchange of ideas and reinforces our knowledge that our differences are a source of strength. As Brown moves forward with the values that sustain our record of excellence and influence in the world, we will continue to welcome and challenge independent, creative, diverse, and courageous thinkers to collaborate, innovate, and explore life changing and world changing impact in servicing the community, nation, and world.
B. EQUAL EMPLOYMENT OPPORTUNITY POLICY

41 C.F.R. §§ 60-741.44(a); -250.1

To provide equal employment and advancement opportunities to all individuals, employment decisions at Brown University will be based on merit, qualifications, and abilities. The University does not discriminate in employment opportunities or practices on the basis of race, color, religion, sex, national origin, ancestry, age, disability, veteran’s status, sexual orientation, gender identity, gender expression or any other distinguishing trait protected by law.

Brown University will make reasonable accommodations for qualified individuals with known disabilities unless doing so would result in an undue hardship. The University prohibits harassment of any individual on the basis of any characteristic listed above.

This policy governs all aspects of employment, including selection, job assignment, compensation, discipline, termination, and access to benefits and training.

Any employee with questions or concerns about any type of discrimination in the workplace is encouraged to bring these issues to the attention of his or her immediate supervisor or:

- Liza D. Cariaga-Lo, V.P. for Academic Development, Diversity and Inclusion
- Catherine Axe, Assistant Dean for Student Life & Director of Accessibility Services
- Wendy McRae-Owoeye, Director of Diversity and Inclusion

Employees can raise concerns and make reports without fear of retaliation, harassment, intimidation, threats, coercion or discrimination because they:
(1) file a complaint with Brown University or with federal, state, or local agencies; (2) assist or participate in any investigation, compliance review, hearing, or any other activity related to the administration of any federal, state, or local equal employment opportunity or affirmative action statute; (3) oppose any act or practice made unlawful by federal, state or local law requiring equal employment opportunity or affirmative action; or (4) exercise any other employment right protected by federal, state, or local law or their respective implementing regulations.
Brown University monitors overall compliance with its equal employment opportunity mandates and responds to any specific complaints applicants or employees file with the Office of Institutional Diversity and Inclusion.

C. UPDATE – VIETNAM ERA VETERANS’ READJUSTMENT ASSISTANCE ACT (VEVRAA) and SECTION 503 REHABILITATION REGULATORY CHANGES

Brown University has decided to take a proactive step towards addressing and implementing regulatory changes. The following is a checklist of the action items arising out of changes made to the regulations for VEVRAA and Section 503. The items have a compliance due date of the start of Brown University’s Affirmative Action Plan Year in 2015.

1. Accessibility of Postings –

<table>
<thead>
<tr>
<th>Prior Requirement</th>
<th>Update – New Requirement</th>
<th>Compliant (Y/N)/ Yes - March 2014</th>
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| The “Equal Employment Opportunity is the Law” poster displaying language, which could be “read to a visually disabled individual.” | ● Braille or large print versions of the Equal Employment Opportunity Law poster must be provided so that the individual with a disability can read the notice himself/herself (EEOC: http://www1.eeoc.gov/eeoc/publications/index.cfm)  
   ● Electronic notices of job postings must be posted in a conspicuous location and format on the company’s intranet or sent by electronic mail to employees. An electronic posting must be made available to job applicants using an on-line application process. | ● As of October 2014, the government has not made EEOC posters available in large print or Braille  
   ● Access to electronic notices of job postings are accessible via the Brown University site or below link for Careers and Jobs at Brown:  
     http://www.brown.edu/about/administration/human-resources/jobsbrown |

2. Notification to Labor Unions -

<table>
<thead>
<tr>
<th>Prior Requirement</th>
<th>Update – New Requirement</th>
<th>Compliant (Y/N)/ Yes - May 2014</th>
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<tbody>
<tr>
<td>Notification to each labor organization or representative of workers</td>
<td>● Annual notification letter should be sent to the Union (or Unions) reminding the Union(s) that the contractor is an equal employment opportunity employer</td>
<td>● A letter was sent to Mr. Justin Pace, President of Brown University Security Patrol person’s Association</td>
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3. Inclusion of Equal Employment Opportunity Clause in Contracts/Subcontracts

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<tr>
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<th>Update – New Requirement</th>
<th>Compliant (Y/N)/Yes - May 2014</th>
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<tr>
<td>● Necessary to include the Equal Employment Opportunity Clause in contracts</td>
<td>● The expanded Equal Employment Opportunity Clause now reads as follows: [Name of contractor] is a federal government contractor and, as such, the provisions of 41 CFR § 60-1.4(a) are, if applicable, incorporated by reference. In addition, this contractor and subcontractor shall abide by the requirements of 41 CFR § 60-300.5(a) and 41 CFR § 60-741.5(a). These regulations prohibit, respectively, discrimination against qualified protected veterans and qualified individuals on the basis of disability, and require affirmative action by covered prime contractors and subcontractors to employ and advance in employment qualified protected veterans and qualified individuals with disabilities.</td>
<td>● The Assistant Vice President and University Controller has confirmed distribution of the Clause language with the Managing Director, Finance, Operations and Systems, and others with contract/subcontract responsibilities at the University</td>
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4. Equal Employment Opportunity Tagline in Job Solicitations

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<th>Update – New Requirement</th>
<th>Compliant (Y/N)/Yes - May 2014</th>
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<tr>
<td>● Equal Employment Opportunity and Affirmative Action Employer</td>
<td>● [Contractor] is an EEO/Affirmative Action Employer – M/F/Disability/Veteran, or [Contractor] considers applicants for employment without regard to, and does not discriminate on the basis of, gender, race, protected veteran status, disability, or any other legally protected status</td>
<td>● Advertisement language for Brown University now includes the expanded Equal Employment Opportunity Clause</td>
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5. Listing Procedures with Job Service

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<tr>
<th>Old Requirement</th>
<th>Update – New Requirement</th>
<th>Compliant (Y/N)/ Date</th>
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<tr>
<td>● The regulations have always required that job openings (for which external recruitment is to occur) be listed with the appropriate state workforce agency</td>
<td>● Requires that job openings continue to be listed with the appropriate state workforce agency (e.g., external recruitment). The regulation changes also require the appropriate website link. The link is to provide veterans protected by VEVRAA with access to apply for job openings</td>
<td>● Brown University jobs are located in two places on RI Department of Labor and Training (DLT) website. Brown University’s jobs are found in EmployRI, which contains our state job board. EmployRI is a virtual one-stop system and a tool for job seekers, employers and DLT staff. It spiders jobs from corporate sites, private job boards, state, and municipal job boards, educational entities and other media each day (usually occurs sometime early morning). Job seekers can use this site to search for jobs numerous ways. Brown University's postings are currently listed in EmployRI. DLT also has a link on the State Jobs web page that links directly to the state and private colleges and universities - <a href="http://www.dlt.ri.gov/jobsri/coluniv.htm">http://www.dlt.ri.gov/jobsri/coluniv.htm</a>. This brings job seekers directly out to Brown University’s Human Resource website where the jobs are posted.</td>
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6. Accommodation in On-Line Application Process

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<tr>
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<th>Update – New Requirement</th>
<th>Compliant (Y/N)/ Date</th>
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</thead>
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<tr>
<td>Yes - December 2014</td>
<td>Yes - December 2014</td>
<td>Yes - December 2014</td>
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</table>
Since 2008, the Office of Federal Contractors Compliance Programs has required that contractor’s electronic or on-line job application system be accessible and compatible with assisted technologies used by individuals with disabilities.

The on-line system should contain instructions to candidates on how to request a reasonable accommodation, including the contact information for a responsible official.

Brown University’s “Jobs at Brown” website page for the on-line system includes instructions to candidates as indicated below:

Applicants with Disabilities
Questions related to completing the federal form CC-305 or requesting accommodations at the application, interview or employment stages of the process can be directed confidentially to Employee Accessibility Services: 401-863-9588 or SEAS@brown.edu. The University’s ADA employment policy also provides additional information.

D. REVIEW OF PERSONNEL PROCESSES
41 C.F.R. §§ 60-741.44(b);-250.6(b)

Brown University ensures that its personnel processes provide for careful, thorough, and systematic consideration of the job qualifications of applicants and employees with known disabilities and for Vietnam Era Veterans, disabled veterans, recently separated veterans, other protected veterans and armed forces service medal winners (“veterans”) for job vacancies filled either by hiring or promotion and for all training opportunities offered or available.

The University also ensures that its personnel processes do not stereotype disabled persons or veterans in a manner which limits their access to jobs for which they are qualified.

Brown University also periodically reviews its processes and makes any necessary modifications to ensure that these obligations are carried out. The following procedure facilitates a review of the implementation of these requirements: Each employee is invited to identify himself or herself as a veteran and/or a person with a disability so he or she may benefit from this Affirmative Action Program.
E. PHYSICAL AND MENTAL QUALIFICATIONS
41 C.F.R. § 60-744(c), -250.6(c)

The University reviews all physical and mental job qualification requirements with line management and supervisors to ensure that, if and to the extent that, qualification requirements screen out or tend to screen out qualified disabled individuals or veterans, they are job-related and consistent with business necessity and the safe performance of the job. This review is performed when a position is created or becomes open.

If and to the extent that, physical or mental job qualification requirements screen out or tend to screen out qualified disabled individuals or veterans in the selection of employees or applicants for employment or other changes in employment status such as promotion or training, the University assures that the requirements are related to the specific job(s) for which the individual is being considered and are job related and consistent with business necessity and the safe performance of the job.

F. REASONABLE ACCOMMODATION OF PHYSICAL AND MENTAL IMPAIRMENTS
41 C.F.R. §§ 60-741.44(d); -250.6(d)

Brown University makes reasonable accommodations to the known physical or mental limitations of all otherwise qualified individuals with a disability unless it can demonstrate that the accommodation would impose an undue hardship. After making an offer of employment and periodically thereafter, job applicants and employees are invited to self-identify and inform the University if he or she wishes to benefit under this Affirmative Action Plan. If an employee with a known disability is having significant difficulty performing his or her job and it is reasonable to conclude that the performance problem may be related to the known disability, the University confidentially notifies the employee of the performance problem, inquires whether the problem is related to the employee’s disability, and often consults with the Director of Student and Employee Accessibility Services. If the employee responds affirmatively, the University confidentially inquires whether the employee is in need of a reasonable accommodation.

Employees may also contact the following at any time for further information:
Catherine Axe
Assistant Dean for Student Life & Director of Accessibility Services
Office of Student Life
Brown University
Box P
Providence, RI 02912
(401) 863-9588
G. HARASSMENT 41 C.F.R. §§ 60-741.44(e)

Brown University has developed and implemented procedures to ensure that its employees with disabilities and veterans are not harassed because of their disability or veteran’s status; including, but not limited to the requirement of mandatory harassment training for all employees.

Employees may also contact the following at any time for further information:
Wendy McRae-Owoeye
Director of Diversity and Inclusion
Office of Institutional Diversity
Brown University
Box 1862
Providence, RI 02912
(401) 863-1787

H. AUDIT AND REPORTING SYSTEM
41 C.F.R.§§ 60-741.44(h);-250.6(h)

As appropriate, the University:

1. Measures the effectiveness of its affirmative action program.
2. Indicates any need for remedial action.
3. Determines the degree to which its objectives are being attained.
4. Determines whether individuals with known disabilities and veterans have had the opportunity to participate in all of its educational, training, recreational and social activities.
5. Measures its compliance with the affirmative action program’s specific obligations.

Where the University finds the affirmative action program to be deficient, the University undertakes necessary action to bring the program into compliance.
RESPONSIBILITY FOR PROGRAM IMPLEMENTATION
In accordance with Section 60-2.22 of Revised Order 4, the V.P. for Academic Development, Diversity and Inclusion has been appointed by the President.

Responsibility for Program Implementation on behalf of Faculty
The function of the V.P. for Academic Development, Diversity and Inclusion is in accordance with the provisions outlined as follows:

1. Work with faculty search committees to develop strategic hiring plans designed to attract a diverse range of candidates especially women and minorities to applicant pools.

2. Provide an annual report of the hiring season outlining processes used to enhance the pool of qualified applicants, summary statistics of demographics of pools and shortlists, and demographics of those hired.

3. Work with faculty committees to address diversity concerns.

4. Work with units to prepare and implement strategic plans to increase diversity in the applicant pools for faculty positions.

5. Collaborate with community organizations to recruit more effectively from local communities.

6. Work with the Vice President for Human Resources to ensure that policies and practices promote and support diversity goals.

Responsibility of Program Implementation on behalf of Staff
The functions of the Director of Diversity and Inclusion are in accordance with the provisions outlined as follows:

1. Serve as a representative of the University with employment enforcement agencies and other groups concerned with employment opportunities for minorities, women, persons with disabilities and veterans; Assist the Director of Human Resources Services and Human Resources Generalists to identify and monitor that status of qualified candidates making application to Brown’s job application and interview process.

2. Consult with the Vice President for Human Resources, General Counsel, and Associate Provost for Academic Development and Diversity in the analysis of
the effect of federal, state and local equal employment opportunity laws on the University;

3. Analyze, in accordance with the General Counsel's interpretation of the law, internal and external data relative to the University's compliance with federal and state equal opportunity laws;

4. Keep abreast of major developments in community affairs, both nationally and in the local community;

5. Provide assistance to University administrators in the development of policies and procedures that will ensure:
   - University compliance with anti-discrimination laws
   - University government eligibility for funding in support of equal employment opportunity
   - The University's positive equal employment opportunity posture, nationally and in the local community

6. Recommend to operating divisions of the University, procedures, practices and programs necessary or desirable to accomplish the University’s equal employment opportunity policies;

7. Provide, as necessary or desirable, advice, counsel and service in handling equal employment opportunity compliance problems and individual complaints, and recommend remedial action;

8. Keep senior officers of the University informed of performance and progress on equal employment opportunity matters.

9. Establish procedures for identification of problems and the processing and resolution of complaints concerning discriminatory practices and policies;

11. Conduct periodic audits of training programs for content and participation, review hiring, promotion and termination patterns, and staff selection procedures, in order to remove impediments to the attainment of goals and objectives;

12. Conduct regular discussions with managers, supervisors and employees to ensure that the University's policies are being followed; Assist the Diversity Advisory Board and Diversity Advisory Cabinet in their efforts in support of Veterans; support the new Office of Student Veterans and Commissioning Programs established in 2013; include the Office of Student Veterans and Commissioning at job information workshops, job fairs, and outreach events.
13. Monitor employment processes and review the qualifications of employees to ensure that veterans and persons with disabilities are given appropriate opportunities for development; also, participate in Veteran and Disability forums and job fairs in Rhode Island at the: Trudeau Center, Veteran Affairs Medical Center, Department of Labor and Training, Yellow Ribbon; job information awareness workshops held by Brown University in partnership with The University of Rhode Island, the Rhode Island Department of Labor and Training, and, outreach efforts with the Local Veterans Employment Representatives of Rhode Island.

14. Conduct periodic audits and inspections to ensure that:

- EEO posters are properly displayed
- All University facilities maintained for the use and benefit of employees are desegregated both in policy and use
- Minority and women employees are afforded full opportunity and are encouraged to participate in all University sponsored educational, training, recreational and social activities
- Ensure that the University’s commitment to Equal Employment Opportunity and Affirmative Action are known and understood at all levels of the University
- Ensure that decisions and personnel actions affecting employees and prospective employees are properly documented and maintained
- Design and implement auditing and reporting systems to measure effectiveness of the University’s Affirmative Action Program

OTHER OFFICES CHARGED WITH ENSURING FAIR AND EQUITABLE HIRING AND RETENTION OF STAFF OR FACULTY INCLUDE:

The Provost will:

1. Hold deans, department chairs, and program directors accountable for increasing diversity, especially the proportions of women and minority faculty;

2. Provide resources to support improved recruitment;

3. Identify areas of greatest priority;

4. Ensure that the University conducts aggressive national searches designed to produce richly diverse and qualified applicant pools;
5. Initiate opportunities for chairs, directors, and other faculty to learn more about strategies for recruiting and retaining a diverse faculty;

6. Create a database of job openings in the area as a resource for the recruitment of new faculty; including, but not limited to using the postdoctoral fellows programs as an opportunity to diversify targeted areas of concern.

The Dean of the Faculty, Dean of Medicine and Biological Sciences, and department chairs and program directors will:

1. Ensure that faculty search committees actively recruit and examine a wide range of candidates, examine a wide range of candidates for open positions guided by strategic planning, clear goals, and timelines;

2. Increase strategic plans for recruitment for veterans and disabled candidates in fields where they continue to be disproportionately underrepresented;

3. Ensure that department climates welcome diversity in its many forms;

4. Create a faculty development program designed to teach new faculty about processes, procedures, and customs of the University; and

5. Encourage faculty to attend seminars and workshops designed to share information about maintaining climates conducive to faculty diversity.

The Vice President for Human Resources is responsible for the following:

1. Ensure that senior managers, department heads, managers and supervisors welcome and encourage diversity and inclusion among all levels of staff; review the University’s compensation and benefit policies to ensure non-discrimination on the basis of race, color, religion, sex, national origin, age, qualified disability, sexual orientation, gender identity or gender expression;

2. Ensure that University Human Resources will maintain a database which reflects the name, title, race, sex, EEO job category, job classification number, salary grade and salary for each employee of Brown University; ensure that job qualifications and descriptions, which detail the criteria upon which the hiring manager will make the decision to accept or reject an applicant are accurate, valid, in compliance with University policy and federal and/or state law, and
fairly reflect duties, responsibilities and requirements consistent with the function of each position; maintain self-identification records;

3. Ensure that employees are given an opportunity to self-identify and records are maintained which reflect available applicant flow information including name, race, sex, date of application, position desired, category of position, and referral source; ensure that records are maintained reflecting the numbers of hires, promotions, transfers and terminations by name, race, sex, date of action, job title, and EEO category;

4. Ensure that the University advertises as an EEO/AA employer and that all advertising which is placed in newspapers or other publications advertisements will contain the statement “Brown University is an Equal Employment Opportunity/Affirmative Action Employer – M/F/Disability/Veteran,” which means Brown University considers applicants for employment without regard to, and does not discriminate on the basis of gender, race protected veteran status, disability, or any other legally protected status. In addition, the V.P. of Human Resources will assure on a semi-annual basis that the University EEO/AA Officer will send a letter to agency directors and community groups encouraging them to utilize https://careers.brown.edu to refer women, minorities, Vietnam Era and other qualified veterans, and persons with disabilities for employment opportunities at Brown;

5. Ensure that when women and minority employees are disciplined, demoted, or if it becomes necessary for the University to downsize, including layoffs and terminations, a review in advance will be made to ensure that employees are treated fairly and are not adversely affected on the basis of race or gender, contrary to federal or state laws.

The Vice President and General Counsel is responsible for the following:

1. Analyze federal, state and local EEO laws and regulations. Coordinate the University policy for compliance with federal and state regulations; advise Human Resources, senior officers and department heads, in the exercise of their duties and responsibilities;

2. Review laws and recent court decisions related to EEO/AA laws and regulations and advise management of pertinent decisions for guidance and promulgation;

3. Advise the University in the investigation and response to complaints and other inquiries from federal, state and local enforcement agencies; and represent the University in all legal matters before the Courts or State or Federal agencies.
The Purchasing Manager and Purchasing Agent are responsible for the following:

1. Provide reports to the Director of Diversity on the active business of minority and women owned vendors with the University, and conduct regularly scheduled meetings discussing the names of subcontractors, vendors, and suppliers doing business with the University as well as the process used to identify and select the minority and women owned businesses.

2. Proactively identify new and existing vendors in support of diversity supplier initiatives and ensure that each subcontractor, vendor and supplier is informed in text, or by reference to, their obligations with regard to Equal Employment Opportunity and Affirmative Action in accordance with federal law; maintain a listing of all vendors reflecting total dollars of purchase orders placed with each vendor.

The University is committed to continuing to increase the diversity of staff and faculty through targeted and aggressive recruitment strategies. Brown is also committed to creating innovative retention programs, including but not limited to training and development for staff and faculty.

Office of Federal Contract Compliance Programs (OFCCP)
2012 Compliance Evaluation and Brown University’s Response

OFFICE OF FEDERAL CONTRACT COMPLIANCE PROGRAMS (OFCCP)
– 2012 Compliance Evaluation

The Office of Federal Contract Compliance Program (OFCCP) notified President Ruth Simmons by letter dated December 21, 2011 that it had completed its evaluation of the University’s compliance with Executive Order 11246, as amended, Section 503 of the Rehabilitation Act of 1973, as amended, and the Vietnam Era Veterans’ Readjustment Assistance Act of 1974, as amended (38 USC 4212), and the implementing regulations at 41 CFR Chapter 60, an evaluation that had been underway since March 22, 2011. The OFCCP found one deficiency in Brown’s compliance efforts, namely, that Brown did not obtain and keep a record of the racial identity of applicants for faculty positions. The maintenance of an effective applicant tracking system is required for full compliance. Brown has entered into an agreement with the OFCCP.

1 Approved by: OFCCP Compliance Evaluation (dated January 13, 2012) to: Mark S. Schlissel, Provost, Lina M. Fruzzetti, Associate Provost and Director of Institutional Diversity, and Kevin McLaughlin, Dean of the Faculty from: Beverly E. Ledbetter, V.P. President and General Counsel and James M. Green, Deputy Counsel.
Brown University’s Response

Fiscal Year 2013:

In July 2012, Brown University implemented Workday, a human capital management system. The system is designed to help organize and pay employees by using a single system-of-record. The system also allows employees to update their self-identification information including race and ethnicity changes.

In 2012, University employees were requested to update self-identification information and status as a veteran or individual with a disability.

Fiscal Year 2014

In July 2013, a new Workday Financial system was implemented to ensure better controls, consistency, and compliance with financial accounting, reporting, and governance requirements. The system unifies process controls and security to ensure consistency with processes and proper regulatory compliance, such as separation of duties and data privacy.

Fiscal Year 2015

In July 2014, updates were made to the relatively new Workday Financial system to ensure better reporting and compliance with identifying and monitoring the self-identification of vendors doing business with Brown University.