I. POLICY/PURPOSE

It is the policy and purpose of UPMC to provide equal employment opportunity (EEO) according to job qualifications without discrimination on the basis of race, color, religion, ancestry, national origin, age, sex, genetics, sexual orientation, or marital, familial, or disability status or status as a covered Veteran or any other legally protected group status. UPMC is committed to taking positive steps to eliminate barriers that may exist in EEO and in employment practices. Areas of focus include, but are not limited to: recruiting, hiring, promotion, demotion, transfer, layoff, termination, rates of pay or other forms of compensation, training, and education.

Links to policies referenced within this policy can be found in Section VI.

II. SCOPE

This policy applies to all United States based UPMC staff members.

III. RESPONSIBILITIES

The management of UPMC business units and human resources has ultimate responsibility for equal employment opportunity.

A. UPMC Business Unit/Division’s Responsibilities

1. It is expected that each department comply with EEO guidelines including but not limited to, recruiting, hiring, promotion, demotion, transfer, layoff, termination, rates of pay or other forms of compensation, training, and education.

2. The UPMC management staff is responsible for fair, equal, and just treatment of staff members in compliance with EEO guidelines.

3. During recruitment for vacancies, each hiring department is responsible for communicating/providing the following to the Human Resources Department in order to comply with the law:
• the reasons for rejection for all applications and transfer requests routed to the manager
• who was interviewed
• interview notes if taken

B. Human Resources’ Responsibilities:

1. Administer the UPMC EEO Policy.

2. Comply with EEO guidelines in all UPMC human resources policies.

3. Communicate to staff members their rights and the resources available to them to promote compliance with the EEO policy.

4. Comply with EEO guidelines including, but not limited to, in recruiting, hiring, promotion, demotion, transfer, layoff, termination, rates of pay or other forms of compensation, training, and education.

5. Maintain recruitment, selection, and other employment records, including but not limited to printed screens of any social media and/or other publicly-accessible electronic databases that are searched during the recruitment and hiring process, that can be used to monitor compliance.

6. Serve as the UPMC liaison to government and other enforcement agencies in reporting EEO data.

7. Investigate and respond to grievances.

8. Oversee management’s compliance with EEO guidelines.

IV. EMPLOYMENT PRACTICES: COMPLIANCE WITH EEOC

A. The UPMC employment practices are designed to develop and maintain sources of qualified candidates and to determine that the recruitment, selection, transfer, promotion, and compensation of staff members are in compliance with federal, state and local equal employment regulations. It is the intent of UPMC to recruit a diverse selection of candidates based on a search of the employment market. UPMC prohibits discrimination at all stages of the recruitment and hiring process, including but not limited to its posting and solicitation of candidates; consideration of information obtained in conjunction with any third party and/or in-house background investigation, including those that may be conducted using social media and/or other publicly-accessible electronic databases; interviews; and hiring decisions.
B. Recruitment

The Human Resources Department seeks candidates from a variety of sources to provide an adequate applicant pool regardless of race, color, religion, national origin, ancestry, age, sex, genetics, sexual orientation, or marital, family, or disability status, or status as a covered Veteran or any other legally protected group status.

Among these resources are:

1. **Training/Education/Career Counseling** - UPMC is dedicated to providing equal opportunities for advancement to all staff members through UPMC wide training, career counseling, and educational assistance. Efforts are put forth to encourage all staff members to take advantage of these career advancement opportunities.

2. **Job Postings** - Vacancies are posted internally in accordance with the Recruitment and Selection Policy.

3. **Web site** - UPMC maintains a web site which includes a comprehensive listing of career opportunities and links to training and educational programs leading to careers in the healthcare field.

4. **Publications/Media** - Every reasonable effort is made to communicate and recruit effectively for openings within the UPMC. Local and national news media, professional journals, and bulletins are utilized by Human Resources. The choice of media and location is determined based on the nature of the position and the specialization involved.

5. **Community Resources** - Information on job vacancies is provided to community based organizations, job centers, local Veterans Administration office, the state vocational rehabilitation agency and various other agencies and groups. In addition, partnerships and collaborations are formed with community based organizations offering training, information sessions on UPMC, mock interviews, job fairs, externships, job shadowing and networking events.

6. **Miscellaneous** – UPMC utilizes search firms, college recruiting, internship programs, school to work programs, and specialized recruitment events.

C. Recordkeeping and Reporting

1. The Human Resources Department maintains records of all applicants, including for each person interviewed a record of the interviewee’s race, sex, position applied for and disposition status.
2. Background checks are conducted only with a final applicant’s approval. School records are obtained when advisable, particularly for those recent graduates who have no former employer to contact. Information that would have a disparate impact on any group protected under this policy is not solicited or retained unless clearly job-related.

3. Records are maintained for new hires, transfers, promotions, demotions, and terminations.

4. The Statement of Equal Employment Opportunity must be posted at all times.

V. COMPLIANCE ASSURANCE

1. Any staff member who believes this policy has been misinterpreted, misapplied, or otherwise violated in its application may file a grievance or a complaint with their respective Human Resources Department. The staff member may communicate the grievance in writing or during a face-to-face discussion. See Grievance Procedure policy.

2. Any other person who believes this policy has been misinterpreted, misapplied, or otherwise violated in its application may file a complaint with UPMC business unit’s President and/or CEO or the Human Resources administrator. The CEO or Human Resources administrator will direct an investigation of the allegations, will disclose findings of fact, and will recommend action.

VI. POLICIES REFERENCED WITHIN THIS POLICY

HS-HR0738 Recruitment and Selection
HS-HR0707 Grievance Procedure

SIGNED: Gregory K. Peaslee
Senior Vice President, UPMC and Chief Human Resources and Administrative Services Officer

ORIGINAL: October 1, 2000

APPROVALS:
Executive Staff: April 19, 2013

PRECEDED: April 25, 2012

SPONSOR: Senior Vice President, UPMC and Chief Human Resources and Administrative Services Officer

* With respect to UPMC business units described in the Scope section, this policy is intended to replace individual business unit policies covering the same subject matter. In-Scope business unit policies covering the same subject matter should be pulled from all manuals.