



**HANDBOOK**

**FOR**

**STAFF AFFIRMATIVE ACTION**

**COMPLIANCE OFFICERS**



Dear Colleagues:

As Staff Affirmative Action Compliance Officers (AACO), you play an important role in monitoring compliance with, and disseminating information about, Penn's equal opportunity and affirmative action policies and procedures. Together, we can help ensure that search, selection and other employment activities fulfill the letter and spirit of the University's commitment to inclusion and excellence. These guidelines have been developed to guide and assist hiring officials and search committees in carrying out their search and hiring responsibilities and to ensure that these processes comply with University policies and Federal and State regulations.

This handbook is designed to provide guidance regarding your responsibilities, compliance procedures, search and selection processes, affirmative action and equal opportunity regulations and related areas. In addition to providing this as a resource, the staff of the Office of Affirmative Action and Equal Opportunity Programs is available to support and assist you. Please call upon us whenever you need information or assistance.

Again, thank you for your energy, commitment and support.

Sincerely,

Sam Starks  
Executive Director

## **Introduction**

The Office of Affirmative Action and Equal Opportunity Programs (OAA/EOP) is responsible for ensuring that the University meets its obligations as an affirmative action/equal opportunity employer and educational institution. The Office of Affirmative Action and Equal Opportunity Programs, therefore, is responsible for implementing, articulating and advocating for the University of Pennsylvania's policies, procedures, and priorities in the areas of equal opportunity and affirmative action.

The University's equal opportunity and nondiscrimination policies arise out of various federal laws and regulations prohibiting harassment and other forms of discrimination on the basis of race, color, national or ethnic origin, religion, creed, sex, age (persons over 40), disability (or association with persons with disabilities), and applicable veteran status. The University's affirmative action obligations arise out of federal laws and regulations requiring that affirmative efforts be taken, in a nondiscriminatory manner and in good faith, to recruit and retain in its workforce qualified women, minorities, persons with disabilities, and covered veterans (special disabled and Vietnam era veterans).

Furthermore, the Pennsylvania Human Relations Act makes it unlawful, in employment, to refuse to hire, to discharge, or to otherwise discriminate in any term or condition of employment because of race, color, religion, ancestry, age (40 and above), sex, national origin, non-job related handicap or disability, possession of a diploma based on passing a general education development test, willingness or refusal to participate in abortion or sterilization, or refusal to contract with certain independent contractors for the same reasons. The Act also makes it unlawful to discriminate against any person because of the handicap or disability of an individual with whom the person is known to have a relationship or association. By City of Philadelphia ordinance, discrimination on the basis of sexual orientation or gender identity is prohibited as well.

For information or assistance, please feel free to contact our office.

Sam Starks, Executive Director  
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**Franklin Building, Suite 421**  
**3451 Walnut Street**  
**Philadelphia, PA 19104**  
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**<http://oaaeop.upenn.edu>**

## **The Policy of Equal Opportunity and Affirmative Action at the University of Pennsylvania**

The University of Pennsylvania's special character is reflected in the diversity of the Penn community. Diversity is prized at Penn as a central component of its mission and helps create an educational and working environment that best supports the University's commitment to excellence in teaching, research, and scholarship. We seek talented faculty, students and staff who will constitute a vibrant community that draws on the strength that comes with a substantive institutional commitment to diversity along dimensions of race, ethnicity, gender, sexual orientation, age, religion, disability, veteran status, interests, perspectives, and socioeconomic status.

Grounded in equal opportunity, nondiscrimination, and affirmative action, Penn's robust commitment to diversity is fundamental to the University's mission of advancing knowledge, educating leaders for all sectors of society, and public service. The University of Pennsylvania prohibits unlawful discrimination based on race, color, sex, sexual orientation, gender identity, religion, creed, national or ethnic origin, citizenship status, age, disability, veteran status, or any other legally protected class.

Penn is committed to ensuring that its academic, social, recreational programs and services as well as opportunities for admission and employment are available on an equitable and nondiscriminatory basis without regard to an individual's legally protected class status. Penn also has written affirmative action programs to address any underrepresentation of women, minorities, people with disabilities, and qualified covered veterans. The Office of Affirmative Action and Equal Opportunity Programs, in collaboration with the Division of Human Resources and the Office of the Provost, oversees the implementation and administration of the University's equal opportunity, affirmative action, and nondiscrimination policies and programs.

The University recognizes the right of members of the community to raise questions and pursue complaints of discrimination and adheres to a strict policy that prohibits retaliation for doing so. Questions, complaints of alleged discrimination, or concerns regarding these policies or their implementation may be directed to the Executive Director, Office of Affirmative Action and Equal Opportunity Programs, Franklin Building, Suite 421, 3451 Walnut Street, Philadelphia, PA 19104-6106, (215) 898-6993 (Voice) or (215) 746-7088 (FAX).

### **University of Pennsylvania Nondiscrimination Statement**

The University of Pennsylvania values diversity and seeks talented students, faculty and staff from diverse backgrounds. The University of Pennsylvania does not discriminate on the basis of race, sex, sexual orientation, gender identity, religion, color, national or ethnic origin, age, disability, or veteran status in the administration of educational policies, programs or activities; admissions policies; scholarship and loan awards; athletic, or other University administered programs or employment. Questions or complaints regarding this policy should be directed to: Executive Director, Office of Affirmative Action and Equal Opportunity Programs, Franklin Building, Suite 421, 3451 Walnut Street, Philadelphia, PA 19104-6106 or by phone at (215) 898-6993 (Voice) or (215) 746-7088 (FAX).

## **Roles and Responsibilities in the Staff Search Process**

### **Affirmative Action and Equal Opportunity in the Search Process**

The Office of Affirmative Action and Equal Opportunity Programs (OAA/EOP) is charged with the responsibility for overseeing the search process to monitor compliance with applicable federal, state, and local nondiscrimination/affirmative action regulations. This ensures that:

- Searches are conducted in an open and fair manner;
- Applicants are not excluded from consideration based on their protected group.
- Affirmative action is taken when filling positions in which minorities and women are underrepresented in relation to their availability in the relevant labor market.

The Office of Affirmative Action and Equal Opportunity Programs is responsible for:

- Training all new Staff Affirmative Action Compliance Officers.
- Arranging regular group meetings of the Compliance Officers to provide additional information and training.
- Receiving and retaining electronic copies of all approved Affirmative Action Compliance Forms submitted by the Compliance Officers.
- Determining whether waivers of the search process will be granted.

Throughout the search process the staff of OAA/EOP is available to provide advice and assistance regarding Penn's equal opportunity and affirmative action requirements to:

- Compliance Officers
- Hiring Officers
- Division of Human Resources Recruiters
- Search Committees

If a Hiring Officer knows of special circumstances which would support a non-competitive appointment to a vacant position, s/he may request that the School/Center Affirmative Action Compliance Officer contact OAA/EOP to discuss the possibility of being granted a waiver of the search process. OAA/EOP will carefully review the justification and will determine whether the request will be granted.

If a Special Efforts Search is required, OAA/EOP will work closely with the Compliance Officer, the Hiring Officer and the Division of Human Resources Recruiter handling the vacancy. This may involve identifying targeted recruitment sources and reviewing the pool to ensure that qualified women, minority, individuals with disabilities, and qualified veteran candidates are actively recruited and are not being unfairly excluded from consideration.

### **The Compliance Officer's Role in the Search Process**

Staff Affirmative Action Compliance Officers are appointed by the Dean or senior administrator to monitor the recruitment and selection processes for staff positions. The Compliance Officer's primary responsibilities are to:

- Ensure compliance with the University's equal opportunity and affirmative action and human resource policies and procedures and
- Provide appropriate assistance to hiring officers in conducting fair and inclusive staff searches.

The specific duties of the Compliance Officer include the following:

- Provide Hiring Officers and Search Committees with information on affirmative action goals, policies and procedures;
- Work with the Hiring Officer and OAA/EOP when a waiver of the search is requested;
- Interface with the Division of Human Resources/Recruitment and Staffing and OAA/EOP to assist Hiring Officer in identifying recruitment resources and strategies for targeting women, minorities, individuals with disabilities and eligible veterans;
- Monitor the search and selection process;
- Review the online Hiring Proposal at the conclusion of the search to ensure compliance with all relevant affirmative action and human resource policies and procedures;
- Approve the online Hiring Proposal. (Signature affirms that a **good faith effort** has been made to comply with all relevant human resource and affirmative action policies and procedures before an offer of employment is made to the finalist.);
- Consult with OAA/EOP and the Division of Human Resources/Recruitment and Staffing when concerns or problems arise with the search; and
- Attend regularly scheduled Compliance Officer meetings and training programs.

### **Hiring Officers and Compliance Officers**

The Hiring Officer and Compliance Officer should work in close collaboration throughout the search process to fill a vacant position. The Hiring Officer should contact the Compliance Officer as soon as the vacancy is known to discuss the following:

- Search and selection process;
- Affirmative action policies and procedures;
- Relevant human resource policies; and
- Any existing goals in the job group to increase the representation of women and minorities.

Throughout the search process the Compliance Officer and the Hiring Officer should maintain regular communication on:

- The progress of the search;
- The composition of the pool, particularly at milestones that candidates are being considered.
- Any need to undertake additional outreach activities.

### **Guidelines for Facilitating and Reviewing the Search and Selection Process**

#### **Posting Requirements**

All regular full-time, regular part-time and limited service staff positions must be posted on the University's Jobs@Penn website. Additional recruitment efforts may be needed to:

- Reach individuals with special skill sets; or
- To increase the number of applicants from underrepresented groups.

The Recruiter in Human Resources has additional information on the available resources that can be used for these purposes.

Hiring Officers should [contact their Recruiter or Affirmative Action Compliance Officer](#) for detailed instructions on conducting searches for staff positions at the University. Recruitment for academic positions is handled through the Provost's Office of Faculty Affairs. The selection of individuals to fill temporary office support positions is handled through the Unique Advantage Partnership. Questions or concerns should be directed to the Division of Human Resources.

## **New Positions**

A new position is one that did not previously exist. The following steps outline the posting process for New and Reclassified Positions:

1. The Hiring Officer completes a [Position Information Questionnaire \(PIQ\)](#) and submits it to the department's HR Coordinator for entry into the HR Manager Electronic Requisition System. The Hiring Officer should communicate to their HR Coordinator whether the position is new or reclassified.
2. The department's HR Coordinator inputs information from the PIQ into the HR Manager Electronic Requisition System.
3. HR Compensation classifies the position by assigning an official University title, grade, and job class code.
4. Recruitment & Staffing posts the position on the Jobs@Penn website and other external job sites and emails the Hiring Officer with the position title, the location of the job on the website, and instructions on how to use the job board to review applicants.
5. Reclassified positions, if currently occupied, are not generally posted for advertisement. This type of position is one in which there has been a significant change in duties and/or qualifications since it was last posted or classified.

## **Replacement Position**

A Replacement Position is a position in which there has been no significant change in duties and/or qualifications since it was last posted or classified and the position title and grade remain the same. The following steps outline the posting process for Replacement Positions:

1. The Hiring Officer completes a [Position Information Questionnaire \(PIQ\)](#) and submits it to the department's HR Coordinator for entry into the HR Manager Electronic Requisition System. The Hiring Officer should communicate to their HR Coordinator that the position is a replacement.
2. The department's HR Coordinator inputs information from the PIQ into the HR Manager Electronic Requisition System.
3. Compensation reviews the position to ensure there have been no significant changes in the duties and/or qualifications. If there have been significant changes, the position will be reclassified to ensure that the title and salary are consistent with other comparable positions at the University.
4. Recruitment & Staffing posts the position on the Jobs@Penn website and emails the Hiring Officer with the position title, the location of the job on the website, and instructions on how to use the job board to review applicants.

## **Waiver Requests**

Whenever a vacancy occurs, all Schools and Centers are encouraged to conduct full and open searches. Exemptions from postings may be granted in certain situations ([refer to HR Policy 105 – Exemptions from Posting](#)).

The OAA/EOP, in conjunction with OHR/Employment, will review all requests for exemptions from posting. The following steps should be followed to initiate a request for a waiver of posting:

1. Create vacant position (Quicklink Posting) in the PeopleAdmin System and assign a reference number.

2. Note that a search waiver has been requested and the position should not be posted.
3. Prepare an online Hiring Proposal in the PeopleAdmin Online Recruitment System, and notify (via email or phone) the Office of Affirmative Action and Equal Opportunity Programs that the Hiring Proposal is awaiting review.

The following must be included in the Hiring Proposal:

- a) A justification for the request (attached as a Hiring Proposal Internal Document)
- b) Name of the selected candidate
- c) Proposed salary
- f) A signed online application and resume (if applicable), and;
- g) If a request is being made to hire a candidate from an existing pool that is no more than four months old the Reference Number of the previous position vacancy must be included.

No employment offer may be made to an applicant prior to the review and approval of the waiver request by the OAA/EOP. The Executive Director and Associate Director of the Office of Affirmative Action and Equal Opportunity Programs are the only ones authorized to approve requests for a waiver of the search process and will approve the Hiring Proposals instead of the School/Center Compliance Officer. Hiring Proposals that have not been approved by OAA/EOP will not be accepted by Human Resources.

Requests for waivers of posting that do not meet one of the established waiver criteria must be posted in accordance with University policy governing the filling of vacancies.

### **Special Effort Search**

As an equal opportunity/affirmative action employer, Penn is committed to taking proactive steps that will increase diversity of its workforce, particularly women, minorities, individuals with disabilities and qualified veterans. The University will act affirmatively to:

- Recruit and promote protected group members,
- Ensure that searches in positions which women, minorities, individuals with disabilities and protected veterans are underrepresented are open and seek out applicants to increase the diversity of Penn's staff.

A Special Efforts Search may undertaken if there is:

- Evidence of underutilization – a position within a job group for which the labor market availability of women or minorities with requisite skills exceeds the current level of women or minorities employed in that job group (from the Utilization Analysis in the University's annual Affirmative Action Plan)
- Adverse Impact – Statistically significance difference in both the rates of positive selections (new hires, promotions and other transfers) into job groups and negative selections (terminations and demotions) from the same job group

When the Compliance Officer identifies a position for which a Special Efforts Search is needed, s/he should consult with the following to discuss ways to expand the outreach to increase the diversity of the applicant pool:

- Office of Affirmative Action and Equal Opportunity Programs
- Human Resources/ Recruitment and Staffing

At the conclusion of a special effort search, the Compliance Officer or Hiring Officer should:

- 1) Detail specific actions on the Hiring Proposal,
- 2) Specify the name of any search firm or advertising resources that were used, and
- 3) Attach copies of the advertisements.

### **Use of External Search Firms**

Search firms offer many services that can facilitate searches particularly for highly specialized positions. You should not assume, however, that search firms are always better at identifying members of protected groups for inclusion in the applicant pool. Search firms act as agents of the University and, therefore, must provide assurances that it will carry out Penn's Affirmative Action and Equal Opportunity policies and will honor any specific institutional goals that have been set. When the use of a search firm is being contemplated, the Division of Human Resources/Recruitment and Staffing must be contacted prior to signing a contract with any firm. A written commitment to this effect should be included in all retainers.

It is the responsibility of the Hiring Officer to ensure that the firm collects the required aggregated race and gender data which should be attached as a PDF document to the Hiring Proposal for the selected candidate.

### **Completing the Staff Hiring Proposal**

The Hiring Proposal documents the actions taken to recruit a diverse pool of candidates for each vacant position. The Hiring Proposal is evidence of the good faith efforts made by the hiring officer to make a selection decision that is consistent with:

- Penn's policy on Equal Opportunity and Affirmative Action,
- Relevant Penn human resource policies, and
- Federal, state, and local law.

OAA/EOP utilizes the following to annually update the University's Affirmative Action Plan:

- Information and data provided on the Hiring Proposal, and
- Additional materials submitted for the selection decision.

Upon notification that a Hiring Proposal is in the queue awaiting review the Compliance Officer should:

1. Review the EEO Report in the PeopleAdmin system which contains the information on the composition of the applicant pool.
2. Confirm that the race and gender information for the interviewed applicants is consistent with that which was provided by the applicant on the Self Identification Form from the on-line application process. (NOTE: The information provided by the applicant will override the visual identification by the Hiring Manager.) Make the necessary correction to the Hiring Proposal.
3. Determine whether minorities and women were fairly represented in the overall pool.
4. Determine whether the selection of applicants to be interviewed was made consistent with Penn's policies.
5. Provide heightened scrutiny for Hiring Proposals that indicate that only one candidate was interviewed. This ensures that:
  - a) The search was conducted fairly
  - b) A pre-selected candidate was not offered the position without giving other applicants appropriate consideration.

6. The Compliance Officer must be satisfied that a good faith effort was made to conduct a fair and open search, by identifying best practices with outreach efforts and reviewing the search and selection process for this position in compliance with relevant University policies and procedures pertaining to filling vacancies including equal opportunity/affirmative action. If that is the case, the Compliance Officer will approve the Hiring Proposal acknowledging that the search was conducted in accordance with Penn policy and forward the Hiring Proposal to Central Human Resources.

An online training module is available on the Human Resources web site (<https://www.hr.upenn.edu/for-managers/hiring-and-recruitment>) to guide those involved in the search and selection process on the use of the new online system.

## Definitions

**Equal Employment Opportunity** Ensure that people have access to jobs regardless of their race, gender, age, national origin, religion, disability, sexual orientation, or gender identity, limited only by their ability to do the job.

**Affirmative Action** is designed to help eliminate effects of the past and present discrimination. It is a process in which employers identify areas of improvement and take positive steps to enhance opportunities for protected class members such as women, minorities, individuals with disabilities and qualified veterans. Affirmative Action focuses on hiring, training, and promoting qualified protected class members where they are represented. It is a proactive response to remedy past discrimination or to ensure compliance with EEO laws. As a Federal contractor, the University of Pennsylvania is required to comply with all laws and Executive Orders related to Affirmative Action and Equal Employment Opportunity. Executive Order 11246 requires Penn, as a government contractor, to have an **Affirmative Action Plan** and to make a **good faith effort** to address instances where members of protected groups are under-represented in the University's work force in relation to their availability in the relevant recruitment area.

### Protected Groups

Under federal, state and local employment discrimination statutes, discrimination is prohibited based upon race, color, sex, sexual orientation, gender identity, religion, creed, national or ethnic origin, citizenship status, age, disability, veteran status.

### Diversity at Penn

Penn rejoices in the rich diversity of persons, groups, views, and academic disciplines and programs that grace the campus of the nation's first university. Tapping our diversity to strengthen ties across all boundaries enriches the intellectual climate and creates a more vibrant community. Fostering and nourishing this diversity, especially among students, faculty, staff, and trustees must remain central to the core missions of the University.

### Labor Market Availability

The University of Pennsylvania has identified each job at the University as belonging to a specific **Job Group**, which is a group of jobs having similar job content, wages and opportunity. The **Labor Market Availability** is the percentage of women and minorities in the relevant recruiting area and/or in the internal feeder pools that possess the requisite skills for positions in a particular job group. Availability figures are used in the University's Affirmative Action Plan to determine whether **under-utilization** exists and, where a goal exists, to determine the level of the goal. Under-utilization exists if there are materially fewer minorities or women in a particular job group than could be reasonably expected based upon their availability in the relevant recruiting area. If Hiring Officers at the

University are using serious and imaginative strategies in outreach and recruitment, the percentage of women and minorities in the applicant pool for a particular position should be in parity with the availability of women and minorities with the requisite skill in the relevant recruitment area.

**University of Pennsylvania**  
**Office of Affirmative Action and Equal Opportunity Programs**

**Employment Discrimination Laws**

**Federal Laws**

**Civil Rights Act of 1866 (Section 1981):** This law, based upon the Thirteenth Amendment of the Constitution (Abolition of slavery/involuntary servitude), provides basically that “All persons...shall have the same right...to make and enforce contracts, to sue, to be parties, give evidence, and to the full and equal benefit of all laws and proceedings for the security of persons and property as is enjoyed by white citizens....” This law covers racial/ethnic discrimination in private contractual relationships such as employment.

**The Equal Pay Act of 1963:** This law prohibits sex discrimination in wages between employees performing equal work, and it is an amendment to the Fair Labor Standards Act of 1938. It covers nearly all employers covered by the Fair Labor Standards Act, regardless of race.

**Title VII of the 1964 Civil Rights Act:** This law covers many subjects, including public accommodations and services, in addition to employment discrimination. Title VI prohibits discrimination by entities receiving financial assistance. Title VII prohibits discrimination by employers, labor organizations and employment agencies on the basis of race, color, sex, religion, and national origin. Title VII also requires that private employers of 100 or more workers file an EEO report (IPEDS for institutions of higher education) biennially.

**The Age Discrimination in Employment Act of 1967:** This law covers discrimination by employers, unions, and employment agencies against persons aged 40 or more. It was passed as an amendment to the Fair Labor Standards Act of 1938.

**The Rehabilitation Act of 1973:** This law covers only the federal government, contractors with the federal government, and recipients of federal financial assistance. Its prohibitions and remedies for disability discrimination and reasonable accommodation, and various procedural provisions, vary from section to section. The body of legal standards and interpretations developed under the Rehabilitation Act has been incorporated into the Americans with Disabilities Act.

**Vietnam Era Veterans Readjustment Act of 1974:** This law deals with the rights of Vietnam Era (September, 1964 through May, 1975) military service veterans, in terms of nondiscrimination by employers and preferential employment policies by the federal government.

**Title I of the Americans with Disabilities Act of 1990:** In addition to public accommodations, government services, telecommunications, and other such areas, this law in effect extends the substantive nondiscrimination and reasonable accommodations requirements of the Rehabilitation Act to private employers, unions and employment agencies generally.

**The ADA Amendments Act of 2008 (ADAAA):** This law made a number of significant changes to the definition of “disability” under the Americans with Disabilities Act (ADA). In enacting the ADAAA, Congress made it easier for an individual seeking protection under the ADA to establish that he or she has a disability within the meaning of the statute. Congress overturned several Supreme Court decisions that Congress believed had interpreted the definition of “disability” too narrowly, resulting in a denial of protection for many individuals with impairments such as cancer, diabetes, and epilepsy. The ADAAA states that the definition of disability should be interpreted in favor of broad coverage of individuals.

**The Family and Medical Leave Act of 1993 (FMLA)** entitles eligible employees of covered employers to take unpaid, job-protected leave for specified family and medical reasons.

**Pregnancy and Workplace Laws** entitles pregnant employees to additional rights under the Family and Medical Leave Act (FMLA), which is enforced by the U.S. Department of Labor. Nursing mothers may also have the right to express milk in the workplace under a provision of the Fair Labor Standards Act enforced by the U.S. Department of Labor's Wage and Hour Division.

**Sections 102 & 103 of The Civil Rights Act of 1991:** The 1991 Act amended several of the statutes enforced by EEOC, both substantively and procedurally. Previously, jury trials were possible only in cases brought under the EPA or the ADEA. Under the provisions of the 1991 Act, parties could now obtain jury trials, and recover compensatory and punitive damages in Title VII and ADA lawsuits involving intentional discrimination. The Act placed statutory caps on the amount of damages that could be awarded for future pecuniary losses, pain and suffering, and punitive damages, based on employer size.

**Title IX of the Educational Amendments of 1972:** This law prohibits discrimination on the basis of sex by entities receiving federal financial assistance.

**Title II of the Genetic Information Nondiscrimination Act of 2008 (GINA):** Under Title II of GINA, it is illegal to discriminate against employees or applicants because of genetic information. Title II of GINA prohibits the use of genetic information in making employment decisions, restricts employers and other entities covered by Title II (employment agencies, labor organizations and joint labor-management training and apprenticeship programs - referred to as "covered entities") from requesting, requiring or purchasing genetic information, and strictly limits the disclosure of genetic information.

## **Federal Executive Orders**

**E.O. 11246 (1965):** This provides that all federal contracts of a certain amount must contain provisions prohibiting discrimination on the bases of race, color, religion, or national origin. This Executive Order requires both equal employment opportunity and affirmative action. Federal contractors are required to develop, and annually update, an Affirmative Action Plan, which includes goals and timetables for the increased utilization of minorities and women. In addition, firms having non-construction government contracts must keep and make available records of work force analyses prepared separately for minorities and women for use in compliance reviews of their Affirmative Action Plans.

**E.O. 11375 (1967):** This added sex discrimination provisions to the above contractual requirements.

**E.O. 11141 (1964):** This provides for nondiscrimination on the basis of age as a contractual requirement.

**E.O. 11758 (1974):** This provides for federal contracts to contain provisions requiring federal contractors to foster the employment of qualified handicapped persons.

## **Pennsylvania Human Relations Act**

The Pennsylvania Human Relations Act states that it is the policy of the Commonwealth to "foster the employment of all individuals in accordance with their fullest capacities regardless of their race, color, religious creed, ancestry, age, sex, national origin, handicap or disability, use of guide or support animals because of the blindness, deafness or physical handicap of the user or because the user is a handler or trainer of support or guide animals, and to safeguard their right to obtain and hold employment without such discrimination, to assure equal opportunities to all individuals and to safeguard their rights to public accommodations and to secure housing accommodation and commercial property regardless of race, color, familial status, religious creed, ancestry, age, sex, national origin, handicap or disability, use of guide or support animals because of

blindness or deafness of the user or because the user is a handler or trainer of guide or support animals.”  
<https://www.phrc.pa.gov/Resources/Law-and-Legal/Pages/The-Pennsylvania-Human-Relations-Act.aspx>

## **Pennsylvania Fair Educational Opportunities Act**

The act states that it is the policy of the Commonwealth “that all persons shall have equal opportunities for education regardless of their race, religion, color, ancestry, national origin, sex, handicap or disability.”

<https://www.phrc.pa.gov/Resources/Law-and-Legal/Pages/PFEOA.aspx>

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## **Philadelphia Fair Practices Ordinance**

This ordinance states that no employer in the City of Philadelphia shall discriminate against any employee or applicant in the terms or conditions of employment on the basis of race, color, sexual orientation, gender identity, religion, national origin, ancestry, age, or handicap.

[https://www.phila.gov/HumanRelations/PDF/FPO%20Ch9-1100%20-9-2016\\_%20nc.pdf](https://www.phila.gov/HumanRelations/PDF/FPO%20Ch9-1100%20-9-2016_%20nc.pdf)

## **Fair Criminal Records Screening Standards Ordinance**

Ban the Box, or the Fair Criminal Records Screening Standards Ordinance, helps make sure that employers make hiring and other employment decisions based on relevant work qualifications without improperly considering a person’s criminal record.

<http://www.phila.gov/HumanRelations/PDF/BanTheBoxOrdinance.pdf>

## **Domestic Violence Unpaid Leave**

The law allows you to take an unpaid leave of absence from work so that you, or someone in your family or household, can get medical attention, legal assistance, social services or other help in dealing with domestic or sexual violence.

<http://www.phila.gov/HumanRelations/DiscriminationAndEnforcement/Pages/DomesticViolenceUnpaidLeave.aspx>

## **General University Policies Link**

<http://www.upenn.edu/services/policies.php>

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