

# **AFFIRMATIVE ACTION PROGRAM FOR MINORITIES & WOMEN**

**University of Washington**

November 1, 2023 through October 31, 2024

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## Preface

University of Washington, (also referred to as the University), is committed to the concept and practice of equal opportunity and affirmative action. In preparing this Affirmative Action Program (AAP), we have been guided by Executive Order 11246 (as amended) and its implementing regulations (41 C.F.R. Part 60-2) and the Guidelines on Affirmative Action issued by the Equal Employment Opportunity Commission ("EEOC") (29 C.F.R. Part 1608). Nothing contained in this AAP or its supporting data should be construed as an admission by the University, in whole or in part, that it has contravened any federal, state, or local employment practice laws, or to sanction the discriminatory treatment of any person.

While the University firmly believes in dissemination of its affirmative action policies and equal employment opportunity practices and makes the non-data components of this AAP available for review to employees and applicants upon request, the AAP remains a proprietary document of the University. Moreover, the data on which the University has relied in preparing this AAP are confidential and sensitive, and the University believes release of the data would subject the University to commercial harm. Reports that require specific data, such as names of employees and salary information, are not an official part of this AAP. This information is on file at the University as Documentation and Supporting Data for AAP Reports, and is available for review only as required by law.

If this AAP or any supporting data or documentation are submitted to the Office of Federal Contract Compliance Programs (OFCCP) pursuant to the Executive Order, the Rehabilitation Act, the Vietnam Era Veterans' Readjustment Assistance Act and/or any implementing regulations (as any or all have been or may be amended), the Equal Employment Opportunity Commission, any local or state fair employment practice agency, or any other federal, state or local government agency, those documents and the information they contain are to be considered confidential and not subject to disclosure without notifying the University of the agency's decision to disclose and providing the University with ample time to contest the disclosure. Advance notice of disclosure should be sent to Brian LaCour. The University requests this information be treated as exempt from public disclosure under the Freedom of Information Act, 5 U.S.C. § 552.

No information contained in the AAP or any supporting data or documentation is to be copied, removed from the premises, or released to other individuals without a prior notification to and permission from the University.

This AAP does not constitute an express or implied contract between the University and its employees, job applicants, or other persons, nor does it change in any way the basic at will employment relationship all University employees have with the University. Nothing in this AAP creates a private right of action on behalf of any individual or group against the University.

## Equal Employment Opportunity and Affirmative Action Statement of Policy

The University of Washington reaffirms its policy of equal opportunity regardless of race, color, creed, religion, national origin, sex, sexual orientation, age, marital status, disability, or status as a protected veteran. This policy applies to all programs and facilities, including, but not limited to, admissions, educational programs, employment, and patient and hospital services. Any discriminatory action can be a cause for disciplinary action.

Discrimination is prohibited by:

- Presidential Executive Order 11246 as amended,
- Washington State Gubernatorial Executive Orders 89-01 and 93-07,
- Title VI and Title VII of the Civil Rights Act of 1964,
- Washington State Law Against Discrimination RCW 49.60,
- Title IX of the Education Amendments of 1972,
- State of Washington Gender Equity in Higher Education Act of 1989,
- Sections 503 and 504 of the Rehabilitation Act of 1973,
- Americans with Disabilities Act of 1990,
- Age Discrimination in Employment Act of 1967 as amended,
- Age Discrimination Act of 1975,
- Vietnam Era Veterans' Readjustment Assistance Act of 1972 as amended,
- As well as other federal and state statutes, regulations, and University policy.

Equal Opportunity and Affirmative Action compliance efforts at the University of Washington are coordinated by the Office of Equal Opportunity and Affirmative Action, you may contact us for more information.

A handwritten signature in black ink that reads "Mindy Kornberg". The signature is written in a cursive, flowing style.

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Mindy Kornberg  
Vice President for Human Resources



## **Sex Discrimination Policy**

### **41 C.F.R. 60-20.1 – 60-20.6**

Pursuant to University of Washington's equal employment opportunity and affirmative action policy, the University prohibits sexual discrimination and harassment in the workplace. This policy applies to all terms and conditions of employment, including but not limited to, recruitment, hiring, promotion, transfer, demotion, layoff or recall from layoff, termination, wage and benefit administration and selection for training or other employment opportunities. The terms "because of sex", on the "basis of sex", "regardless of sex" and "without regard to sex" include, but are not limited to, because of or on the basis of pregnancy, childbirth or related medical conditions, sexual orientation, gender identity and transgender status. In furtherance of the University's commitment to ensuring equal employment opportunity regardless of sex, the University will take the following steps, as appropriate:

- Recruit individuals for all positions without regard to their sex, except where sex is a bona fide occupational qualification
- Ensure job postings and recruitment materials do not express a sex preference, unless sex is a bona fide occupational qualification
- Review employment practices and personnel policies to ensure that applicants and employees are not discriminated against or harassed on the basis of sex
- Provide qualified employees with an equal opportunity to any available job without regard to their sex, except where sex is a bona fide occupational qualification
- Administer employment opportunities, wages, hours, conditions of employment, retirement programs, and other employee benefits regardless of sex
- Develop written policies which prohibit unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature towards employees and take reasonable steps to prevent such harassment from occurring
- Provide appropriate restroom and other facilities for applicants and employees
- Refrain from reliance on any state laws which conflict with the non-discrimination provisions of Title VII of the Civil Rights Act of 1964 or Executive Order 11246 and are superseded thereby
- Ensure employees are not discriminated against because of pregnancy, childbirth, or related medical conditions. Females affected by pregnancy, childbirth, or related medical conditions will be treated the same as other persons who are not so affected but are similarly able or unable to work
- Administer any seniority systems without regard to sex
- Determine wage schedules without regard to sex
- Ensure individuals are not restricted to certain job classifications based on sex.

## **Religious and National Origin Discrimination Policy**

### **41 C.F.R. 60-50.1 – 60.50.5**

Pursuant to University of Washington's equal employment opportunity and affirmative action policy, the University prohibits religious and national discrimination and harassment in the workplace. This policy applies to all terms and conditions of employment, including but not limited to, recruitment, hiring, promotion, transfer, demotion, layoff or recall from layoff, termination, wage and benefit administration, and selection for training or other employment opportunities. In furtherance of the University's commitment to ensuring equal employment opportunity regardless of national origin or religious beliefs, the University will take the following steps, as appropriate:

- Recruit individuals for all positions without regard to their national origin or religious beliefs
- Provide qualified employees with an equal opportunity to available job openings without regard to their religion or national origin
- Administer employment opportunities, wages, hours, conditions of employment, retirement programs, and other employee benefits regardless of religion or national origin
- Provide reasonable accommodation for sincerely-held religious beliefs unless doing so would pose an undue hardship on the University's business.
- Develop reasonable procedures to carry out the University's obligation to provide equal employment opportunity without regard to religion or national origin
- Inform employees of the University's commitment to equal employment opportunity without regard to national origin or religion
- Inform recruitment sources of the University's commitment to equal employment opportunity and seek their assistance and support to provide equal employment opportunity without regard to national origin or religion
- Review employment practices, personnel policies, and available records to ensure that applicants and employees are not discriminated against or harassed on the basis of religion or national origin
- Engage in outreach activities with religious and ethnic organizations and educational institutions

## **Responsibility for Implementation**

### **41 C.F.R. 60-2.17**

University of Washington has assigned primary management responsibility and accountability for ensuring full compliance with the Affirmative Action Program to Brian LaCour, the Affirmative Action Officer of the University. The Affirmative Action Officer has the authority, resources, support of and access to top management necessary to ensure the effective implementation of the AAP. The identity of the Affirmative Action Officer appears on internal and external communications regarding the University's equal employment opportunity and affirmative action policies.

The duties of the Affirmative Action Officer and designees include:

- Developing policy statements, AAPs, and internal and external modes of communication
- Overseeing regular discussions with local managers, supervisors, and employees to ensure the University's policies are being followed
- Training personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes to ensure the commitments in the University's Affirmative Action Program are implemented
- Advising managers and supervisors that the University is obligated to prevent discrimination and harassment of applicants and employees on any basis protected by law
- Identifying any problem areas in implementing the AAP, and developing solutions
- Ensuring policies are in place to identify any barriers to employment based on sex, gender identity, sexual orientation, race, color, religious creed, or national origin and assisting managers in developing solutions to ensure all individuals benefit from equal employment opportunities
- Designing and implementing an internal audit and reporting system to measure the effectiveness of the University's Program, indicate the need for remedial action, determine the degree to which the University's objectives have been attained, determine whether all employees have had the opportunity to participate in University-sponsored educational, training, recreational, and social activities, and ensure each University location is in compliance with applicable laws and regulations
- Serving as liaison between the University and enforcement agencies, and between the University and organizations of and for minorities or females
- Encouraging active involvement by University representatives in the community service programs of local organizations of and for minorities and females
- Ensuring posters and notices are properly displayed or disseminated in ways that are accessible and understandable to applicants and employees
- Keeping management informed of developments in the affirmative action area.



## **Organizational Profile**

### **41 C.F.R. 60-2.11**

As one of the diagnostic components of University of Washington's AAP, the University has completed a profile of the workforce at the Master Plan establishment. The organizational profile is an overview of the staffing patterns at this establishment and is used to determine whether there are areas in the workforce where individuals are underrepresented or concentrated by gender or race.

The Annotated Employee report identifies the employees included in this AAP who work at other University locations and those employees who work at locations covered by this AAP but who, in accordance with 41 C.F.R. 60-2.1, are included in another University AAP. This chart sets forth the locations where the employees are working and/or the AAP in which they are included.

## **Job Group Analysis**

### **41 C.F.R. 60-2.12**

As the second diagnostic component of the AAP, University of Washington has prepared a job group analysis. The job group analysis is the first step in comparing the representation of minorities and females in the workforce covered by this AAP with the estimate of the available qualified minorities and females who could be employed by the University in positions covered by this AAP.

In designing job groups, jobs have been placed in job groups based upon the general criteria of relatively similar content, similar opportunities, and similar rates of pay. Similarity of content refers to the relative duties and responsibilities of the job titles which make up the job group. Similarity of opportunities refers to training, transfers, promotions, pay mobility and other career enhancement opportunities offered by the jobs within the job group.

The job groups in this AAP were developed to serve as a basis for a statistical analysis comparing current workforce utilization to weighted internal and external availability, and, thereafter, to develop annual goals as to minorities and females. Accordingly, job content (reflected in census data matches) and opportunity for advancement (important for determining feeder jobs) have been relied upon more than pay rates in grouping jobs. Moreover, where possible, and, consistent with other factors, job groups were devised which are of a sufficient size to conduct a meaningful utilization analysis. Necessary differences exist in the statistical analysis for utilization and the statistical analysis which would be appropriate for compensation. Therefore, the University does not suggest or agree its job groups contain jobs whose incumbents are sufficiently similarly situated (considering a variety of factors including tasks performed, effort, level of responsibility, working conditions, work location, job difficulty, minimum qualifications, performance and other objective factors) to be included in the same group for purposes of statistical analysis of rates of pay or compensation.

The Job Group Analysis report identifies the job groups created for this AAP, the job titles that comprise each job group, and the percentage of minority incumbents and the percentage of female incumbents in each job group.

The Annotated Employee report identifies the employees included in this AAP who work at other University locations and those employees who work at locations covered by this AAP but who, in accordance with 41 C.F.R. 60-2.1, are included in another University AAP. This chart sets forth the locations where the employees are working and/or the AAP in which they are included.

## **Availability Analysis**

### **41 C.F.R. 60-2.14**

The availability analysis is a part of the Incumbency vs. Estimated Availability Analysis - the final diagnostic component of this AAP. The purpose of the availability analysis is to establish a benchmark against which the demographic composition of the University's workforce may be compared to determine whether barriers to equal employment opportunity may exist within particular job groups.

Pursuant to applicable regulations, the availability analysis for each job group examines two potential areas of availability: individuals with the requisite skills outside the establishment (external availability) and individuals within the establishment who are promotable, transferable, and/or trainable (internal availability). In determining availability, the University has selected a reasonable recruitment area and the pool of promotable, transferable, and trainable employees in such a way as not to exclude qualified minorities and females. Moreover, when determining external availability, the University has used the most current and discrete statistical information available. For this availability analysis, the University has used the EEO 2014-2018 ACS Tabulation Data. Finally, where a job group is composed of different job titles that carry different availability rates, the University calculated a composite availability figure. The University arrived at the composite availability figure by determining the proportion of the job group incumbents employed in each job title, weighting the availability for each job title by the proportion of incumbents employed in that title, and adding together the weighted availability estimates.

A brief written rationale for the selection of the recruitment areas and internal pools by job group is included with this AAP.

## **Comparison of Incumbency vs. Estimated Availability**

### **41 C.F.R. 60-2.15**

University of Washington has compared the representation of minorities and females in each job group with their representation among those identified in the availability analysis as available for employment in the job group. Where actual representation was less than the calculated availability, the University determined whether the difference was greater than could reasonably be expected.

## **Placement Goals**

### **41 C.F.R. 60-2.16**

As required by applicable regulations, University of Washington has established placement goals where the actual representation of minorities or females in a job group is less than would be reasonably expected based on calculated availability.

In establishing placement goals, the University applied the following principles:

- When the percentage of minorities or females employed in a particular job group is less than would reasonably be expected, given their availability percentage in that job group, the University established a percentage annual placement goal at least equal to the availability figure derived for minorities or females, as appropriate, for that job group.
- Placement goals are not quotas that must be met, nor are they to be considered as either a ceiling or a floor for the employment of individuals of a specific race or sex.
- In all employment decisions, the University makes selections in a nondiscriminatory manner. Placement goals do not provide a justification to extend a preference to any individual, select an individual, or adversely affect an individual's employment status, on the basis of that individual's sex, gender identity, sexual orientation, race, color, religious creed, national origin, physical or mental disability, protected veteran status, or other characteristic protected by law.
- Placement goals do not create set-asides for specific groups, nor are they intended to achieve proportional representation or equal results.
- Placement goals are not used to supersede merit selection principles, nor do these placement goals require the University to hire a person who lacks qualifications to perform the job successfully or hire a less qualified person in preference to a more qualified one.

As is described in more detail in the Action-Oriented Program section of this AAP, where a placement goal is set, the University will develop affirmative steps to increase the recruitment and training of the underrepresented group.

## **Identification of Problem Areas by Organizational Unit and Job Group**

### **41 C.F.R. 60-2.17(b)**

University of Washington has conducted analyses of its total employment process, including evaluating the workforce by organizational unit and job group, personnel activity, compensation systems, and other personnel procedures to determine whether and where impediments to equal employment opportunity exist.

An analysis of each of these processes follows.

#### **Composition of the Workforce by Organizational Unit**

The University has analyzed its workforce to determine if minorities or females are significantly underrepresented or concentrated in any organizational unit.

#### **Composition of the Workforce by Job Group**

The University has conducted an availability analysis by job group, considering both external and internal availability, and has compared incumbency to estimated availability to determine placement goals. The descriptions of Factor 1 and Factor 2 by job group are summarized in this AAP. The University has established affirmative action placement goals and programs to address any areas of underutilization and will continue to make a good faith effort to reach the placement goals established by implementing action-oriented programs.

#### **Analysis of Progress Towards Prior Year Goals**

When the percentage of minorities or females employed in a particular job group is less than would reasonably be expected given their availability percentage in that job group, the University has established an annual percentage placement goal at least equal to the availability figure derived for minorities or females, as appropriate, for that job group.

#### **Review of Personnel Activity**

The University has analyzed additional personnel activities to determine whether and where impediments to equal employment opportunity exist and whether there are significant selection disparities by race/ethnicity or gender. These activities include applicant flow, hires, promotions, terminations, and other personnel actions.

#### **Applicant Flow**

The University accepted applications for open positions, and persons interested in obtaining employment with the University were advised to apply according to the

University's current policy. The University periodically reviews recruitment and selection actions to ensure there are no barriers to equal employment opportunity.

## **Hires**

The University periodically reviews recruitment, selection and hiring actions to ensure there are no barriers to equal employment opportunity and no significant differences in selection rates by gender or race/ethnicity. Job descriptions are reviewed to make sure duties are accurately described and the experience and education requirements are job related. Job descriptions will continue to be written without regard to sex, gender identity, sexual orientation, race, color, religious creed, national origin, physical or mental disability, protected veteran status, or any other characteristic protected by law.

Application forms are reviewed to ensure all requested information is job related, and the forms comply with all applicable laws. Where applicable, tests will be reviewed and administered in a non-discriminatory manner.

University representatives who are involved in the selection process will be briefed on the University's obligations. Hiring decisions are to be based on the applicant's experience, skills, abilities, education, and any other job-related criteria.

## **Promotions**

The University provides employees the opportunity to be promoted. The University periodically reviews promotional actions to ensure there are no barriers to equal employment opportunity and no significant differences in selection rates by gender or race/ethnicity.

The University provides reasonable opportunity for employees to advance by offering training and other developmental opportunities. Most promotional opportunities are posted, providing interested employees with an opportunity to apply.

## **Terminations**

The University periodically evaluates its termination practices to ensure there are no barriers to equal employment opportunity and no significant differences in selection rates by gender or race/ethnicity. When terminations or reductions in force are necessary, the University makes its decisions without regard to sex, gender identity, sexual orientation, race, color, religious creed, national origin, physical or mental disability, protected veteran status, or any other characteristic protected by law.

## **Review of Compensation Systems**

As part of its affirmative action obligations, the University has reviewed its compensation systems to determine whether those systems are being administered without regard to an

individual's sex, race, ethnicity, or other characteristic protected by law. If the University discovers significant compensation system differences between individuals who are similarly situated, it will determine whether they are the result of legitimate, nondiscriminatory factors.



## **Development and Implementation of Action-Oriented Programs**

### **41 C.F.R. 60-2.17**

University of Washington has developed and executed action-oriented programs designed to correct any problem areas that may exist. To remove identified barriers and expand employment opportunities, the University engages in or has made plans to implement the activities outlined in this AAP, as appropriate.

The University's commitment to equal employment opportunity is publicized and employees are encouraged to participate in the University's Affirmative Action Program through activities such as the following.

- Written notification of the University's affirmative action policy will be sent to all subcontractors, including subcontracting vendors and suppliers, and request appropriate action on their part.
- The University will make the Equal Employment Opportunity Clause part of all covered contracts and purchase orders.
- The University's Equal Employment Opportunity and Affirmative Action Statement of Policy will be made available to applicants and employees. The policy will include a statement that employees and applicants are protected from coercion, intimidation, and interference or discrimination for filing a complaint or assisting in an investigation under Executive Order 11246, as amended. When applicable, the University will publicize the policy in University publications.
- The University will hold meetings with executive, management and supervisory personnel to explain the University's policy of affirmative action and to make clear the President's support for the policy.
- Advertisements or solicitations for prospective employees will indicate the University is an equal opportunity employer.
- The University will seek to include individuals covered by this AAP when employees are pictured in consumer and personnel recruitment advertising.
- The University will encourage qualified minority and female applicants to apply for available job openings through the following activities, as appropriate:
- Minority and female, as well as non-minority and male, employees will be actively encouraged to refer applicants to the University.
- The University will send available job opportunities to the State Employment Services Delivery System.
- The University will identify local organizations and/or community agencies specializing in placing and/or developing training programs for protected individuals and send them notices of vacant positions.

Where placement goals exist as defined by the OFCCP, the University will contact universities and two- and four-year local colleges, vocational technical schools, high

schools, local business schools, and state and community organizations which attract qualified minority and female students. During the period from November 01, 2022 to October 31, 2023, special recruitment activities were conducted at the following schools and universities: Greater Washington State Higher Education Recruitment Consortium, including:

- Cascadia College
- Columbia Basin College
- Eastern Washington University
- Gonzaga University
- Highline College
- North Idaho College
- Pacific Lutheran University
- Pierce College
- Saint Martin's University
- University of Idaho
- University of Providence
- Washington State University

During the period from November 01, 2022 to October 31, 2023, targeted recruitment activities were conducted at the following diversity outreach and recruitment sources: • Ability jobs

- Accounting & Financial Women's Alliance (AFWA)
- All Diversity
- American Association for Access, Equity and Diversity
- American Indian Higher Education Consortium (AIHEC)
- American Indian Science and Engineering Society (AISES)
- American Job Centers (AJCs)
- Asian Women in Business

- Association for Women in Science
- CareerOneStop “Business Center”
- The Chronicle of Higher Education
- Disabled Veterans’ Outreach Program Specialists (DVOPS) & Local Veterans’ Employment Representatives (LVERs)
- Diverse Issues in Higher Education
- Diverse Scholar
- Diversity/Careers in Engineering & Information Technology
- Diversity Employers
- HBCU Connect
- Hero2Hired (H2H)
- Hire America’s Heroes
- Hispanic Association of Colleges and Universities (HACU)
- The Hispanic Outlook in Higher Education
- Hispanic Today
- iHispano
- INSIGHT into Diversity
- The Journal of Blacks in Higher Education (JBHE)
- Latinos in Higher Education
- Military Vet Jobs
- NASPA – Student Affairs Administrators in Higher Education
- National Association of Asian American Professionals (NAAAP)
- National Association of Black Accountants
- National Association of College and University Business Officers (NACUBO)
- National Black MBA Association

- National Employment Minority Network (NEMNET)
- National Labor Exchange (NLX)
- National Resource Directory: Veterans Job Bank
- OCA – Asian Pacific American Advocates (OCA)
- Out & Equal Workplace Advocates
- Out Professionals
- Society of Hispanic Professional Engineers (SPHE)
- Society of Women Engineers
- Top Higher Education Jobs
- Women in Higher Education
- Workplace Diversity

The University will implement procedures to ensure minority and female employees are given equal opportunities for promotion, such as the following:

- On-the-job training will be provided to all qualified employees to assist them in developing the necessary knowledge and skills for promotion to higher level jobs.
- The University will continue to make opportunities for advancement widely known through its career development process and by encouraging minorities and females to take advantage of these opportunities. Internal job opportunities may be posted so employees may apply to positions of interest.
- The following internal training programs will be offered to eligible employees without regard to sex, gender identity, sexual orientation, race, color, religious creed, national origin, physical or mental disability, protected veteran status, or any other characteristic protected by applicable law:
  1. Professional and Organizational Development courses, including the award winning Strategic Leadership Program
  2. Veterans Incubator for Better Entrepreneurship program
- The University may offer employees the opportunity to participate in external training programs such as the following:
  1. WA State Tuition Exemption Program
  2. Professional memberships in ILG
  3. Participation at professional conferences

## **Internal Audit and Reporting System**

### **41 C.F.R. 60-2.17**

It is the responsibility of the University's Affirmative Action Officer to monitor employment and personnel practices to ensure compliance with applicable regulations and adherence to the University's Affirmative Action Policy, and to measure the effectiveness of University of Washington's AAP.

The University's audit and reporting system is designed and implemented to:

- Measure the effectiveness of the AAP
- Identify any need for remedial action
- Determine the degree to which the University's objectives are being attained
- Determine whether protected individuals have had the full opportunity to equal employment and to participate in all University sponsored educational, training, recreational, and social activities
- Measure the University's compliance with the AAP's specific obligations
- Document the actions taken to monitor the University's compliance with the AAP's specific obligations.

To measure the effectiveness of the AAP, the University may take the following actions:

- Audit the University's voluntary self-identification process to monitor the number of individuals who choose to self-identify and evaluate whether changes could be made to University's self-identification process to encourage greater voluntary self-identification
- Monitor records of applicant flow, referrals, placements, training, transfers, promotions, terminations, and compensation decisions to evaluate the degree to which equal employment opportunity and organizational objectives are being obtained
- Report on the organization's progress towards equal employment opportunity and any identified problem areas so appropriate steps can be taken to resolve any issues
- Examine available utilization and benchmark data regarding protected individuals and develop action-oriented programs to address any areas of underutilization
- Review available data computations and analyses regarding applicants and hires
- Review the effectiveness of the University's recruitment and outreach activities
- Use a schedule to regularly assess any mental and physical qualifications to ensure they are job-related and consistent with business necessity
- Regularly assess the University's personnel processes to ensure all individuals have equal opportunity in employment
- Audit communications with vendors and subcontractors to ensure such communications reflect the University's commitment to equal employment

opportunity and affirmative action

- Audit communications with applicants and employees to ensure such communications reflect the University's commitment to equal employment opportunity and affirmative action
- Audit job listings to ensure the postings reflect the University's commitment to equal employment opportunity and affirmative action, and such postings are timely listed with the appropriate state employment delivery system
- Audit personnel policies to ensure such policies reflect the University's commitment to equal employment opportunity and affirmative action

Where the Affirmative Action Program is found to be deficient, the University shall endeavor to undertake necessary action to improve the Program.