

# **LANE COMMUNITY COLLEGE**

## **EXECUTIVE ORDER 11246**

### **AFFIRMATIVE ACTION PROGRAM**

**Plan Effective Date:** October 1, 2020

**Plan Expiration Date:** September 30, 2021

**AAP Administrator:** Shane Turner, Chief Human Resources Officer

**Approved by:** Margaret Hamilton, President

**Establishment's Name:** Main

**Establishment's Address:** 4000 East 30th Ave. Eugene, OR 97405

# **LANE COMMUNITY COLLEGE**

## **AFFIRMATIVE ACTION PROGRAM for**

### **EXECUTIVE ORDER 11246**

#### **CONFIDENTIAL TRADE SECRET MATERIALS**

The material set forth in the Affirmative Action Plan (AAP) is deemed to constitute trade secrets, operations information, confidential statistical data, and other confidential commercial and financial data, within the meaning of the Freedom of Information Act, U.S.C. 552, Title VII of the Civil Rights Act of 1964 (as amended), 42 U.S.C. 2000e et seq., the Trade Secrets Act, 18 U.S.C. 1905, and 44 U.S.C. 3508, the disclosure of which is prohibited by law and would subject the individual making the disclosure to criminal and/or civil sanctions.

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## **I. Equal Employment Opportunity (EEO) Policy Statement**

The EEO Policy Statement on the following page is posted on our organization's bulletin board along with our required employment posters and is viewable by both employees and applicants. The EEO is the Law poster is also posted on our organization 's bulletin board as well as made available electronically through our organization website for viewing by online applicants.

## **LANE COMMUNITY COLLEGE**

### **EQUAL EMPLOYMENT OPPORTUNITY (EEO) POLICY STATEMENT**

It is the policy of LANE COMMUNITY COLLEGE not to discriminate against any employee or applicant for employment because of his or her race, color, religion, sex, sexual orientation, gender identity, national origin, or because he or she is an individual with a disability or disabled veteran, Armed Forces service medal veteran, recently separated veteran, or active duty wartime or campaign badge veteran, or thereafter referred collectively as "protected veterans." It is also the policy of LANE COMMUNITY COLLEGE to take affirmative action to employ and to advance in employment, all persons regardless of their status as individuals with disabilities or protected veterans, and to base all employment decisions only on valid job requirements. This policy shall apply to all employment actions, including but not limited to recruitment, hiring, upgrading, promotion, transfer, demotion, layoff, recall, termination, rates of pay or other forms

of compensation, and selection for training, including apprenticeship, at all levels of employment. Furthermore, the organization will provide qualified applicants and employees who request an accommodation due to a disability with reasonable accommodations, as required by law.

LANE COMMUNITY COLLEGE prohibits harassment of employees and applicants because they are individuals with disabilities or protected veterans. LANE COMMUNITY COLLEGE also prohibits retaliation against employees and applicants for filing a complaint, opposing any discriminatory act or practice, assisting or participating in any manner in a review, investigation, or hearing or otherwise seeking to obtain their legal rights under any Federal, State, or local EEO law requiring equal employment opportunity for individuals with disabilities and protected veterans. Prohibited retaliation includes, but is not limited to, harassment, intimidation, threats, coercion or other adverse actions that might dissuade someone from asserting their rights.

As President of LANE COMMUNITY COLLEGE, I am committed to the principles of affirmative action and equal employment opportunity. In order to ensure dissemination and implementation of equal employment opportunity and affirmative action throughout all levels of the organization, Shane Turner has been assigned Chief Human Resources Officer duties for LANE COMMUNITY COLLEGE. One of the Chief Human Resources Officer's duties will be to establish and maintain an internal audit and reporting system to allow for effective measurement of LANE COMMUNITY COLLEGE's programs.

In furtherance of LANE COMMUNITY COLLEGE's policy regarding affirmative action and equal employment opportunity, LANE COMMUNITY COLLEGE has developed a written Affirmative Action Program (AAP) which sets forth the policies, practices and procedures that LANE COMMUNITY COLLEGE is committed to in order to ensure that its policy of nondiscrimination and affirmative action for qualified individuals with disabilities and qualified protected veterans is accomplished. This AAP is available for inspection by any employee or applicant for employment upon request between During normal business hours at the Human Resources department. Any questions should be directed to me, your supervisor, or Shane Turner, Chief Human Resources Officer.

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Dr. Margaret Hamilton  
President  
LANE COMMUNITY COLLEGE  
October 1, 2020

## **II. Establishment of Responsibilities for Implementation of the Written Affirmative Action Program (41 CFR 60-2.17(a))**

## **A. Designation of Responsibilities of Chief Human Resources Officer (41 CFR 60-2.17(a))**

Shane Turner, the Chief Human Resources Officer, has the primary management responsibility, authority, and resources for ensuring full compliance with the provisions of E.O. 11246, as amended, and with implementing all applicable regulations. The Chief Human Resources Officer's appointment and a description of the position's basic responsibilities have been communicated to all levels of personnel in the organization. The responsibilities of the Chief Human Resources Officer include, but are not necessarily limited to, the following:

1. Developing EEO policy statements, Affirmative Action Programs, and internal and external communication procedures;
2. Assisting in the identification of AAP/EEO problems;
3. Assisting management in arriving at effective solutions to AAP/EEO problems;
4. Designing and implementing an internal audit and reporting system that:
  - o Measures the effectiveness of the Affirmative Action Program;
  - o Determines the degree to which AAP goals and objectives are met; and
  - o Identifies the need for remedial action.
5. Keeping organization's management informed of equal opportunity progress and reporting potential problem areas within the organization through reports;
6. Reviewing the organization's AAP for qualified minorities and women with all levels of management to ensure that the policy is understood and is followed in all personnel activities;
7. Auditing the contents of the organization's bulletin board to ensure compliance information is posted and up-to-date; and
8. Serving as liaison between LANE COMMUNITY COLLEGE and enforcement agencies.

## **B. Responsibilities of LANE COMMUNITY COLLEGE's Management to Ensure Implementation of the AAP (41 CFR 60-2.17(a))**

In implementing this written Affirmative Action Program, the responsibilities of the organization's supervisors and managers working with the Chief Human Resources Officer include, but are not necessarily limited to, the following:

1. Assisting in the identification of problem areas, formulating solutions, and establishing departmental goals and objectives when appropriate;
2. Reviewing the qualifications of all applicants and employees to ensure qualified individuals are treated in a nondiscriminatory manner when hiring, promotion, transfer, and termination actions occur; and
3. Reviewing the job performance of each employee to assess whether personnel actions are justified based on the employee's performance of his or her duties and responsibilities.

## **III. Identification of Problem Areas (41 CFR 60-2.17(b))**

LANE COMMUNITY COLLEGE performs in-depth analysis of its total employment process to determine if there are areas where minority and/or female groups may face impediments to equal opportunity. The following analyses are conducted to reveal any potential problem areas:

1. **Placement Goals:** An analysis of incumbency versus availability is performed to determine whether there are problems of minority and/or female utilization. Whenever a problem exists, as defined by a statistical methodology, Placement Goals are set (see the Placement Goals report which follows this section).  
Whether there are Placement Goals or not, steps will be taken to encourage and increase the percentage of qualified minorities and/or females applying for positions both externally and internally. These steps may include, but are not limited to the following:
  - o Working with hiring managers and recruiters to determine appropriate outreach to attract qualified applicant pools;
  - o Recruiting at colleges and universities with a significant percentage of minority and/or female students;
  - o Publishing job advertisements in newspapers and/or magazines that target minorities and/or females;
  - o Offering mentorship programs for minority and/or female employees;
  - o Offering job training to minorities and/or females currently employed by the organization to increase their chances of advancement;
  - o Offering tuition reimbursement to employees to obtain training that will increase their chances of advancement;
  - o Using recruitment companies that specifically target minorities and/or females; and
  - o Continuing to use the services of the respective Employment Service Delivery System.
2. **Review of Employment Decisions:** A review of employment decisions is made to determine whether minorities and/or females are selected at a less favorable rate than non-minorities and/or males. A review of non-minorities and/or males is also conducted to determine if either group is being selected at a statistically significant lessor rate than minorities and/or females.
3. **Review of Hires/Promotions:** Whenever minorities and/or females are selected at a lower rate than non-minorities and/or males, a review of the applicant flow is conducted to determine possible reasons why minorities and/or females were not selected at a more favorable rate. If the organization is attracting fewer than expected minorities and/or females that fit the qualifications for the job groups, good faith efforts will be put into place to attempt to improve the applicant flow of qualified minorities and/or females. If non-minorities and/or males are selected at a statistically significantly lessor rate than minorities and/or females, a review of the applicant flow and selection decisions is also made to ensure that there is no evidence of discrimination.
4. **Review of Terminations:** For terminations, if minorities and/or females are being involuntarily terminated or are voluntarily leaving at a higher rate than non-minorities and/or males, a review of the employee files will be made to ensure the organization is applying its policies and procedures for termination equally for protected as well as non-protected classes. If non-minorities and/or males have a statistically significant higher rate of termination than minorities and/or females, an investigation will also be conducted to determine the cause.
5. **Compensation:** Compensation is reviewed at least annually to determine if there are significant discrepancies in pay when comparing female to male rates of pay and minority versus non-minority rates of pay. If discrepancies do exist, a thorough review is conducted to determine if the difference in pay is justified due to appropriate factors. If

the difference in pay cannot be justified, LANE COMMUNITY COLLEGE will put a plan in place to bring pay into greater alignment.

**Job Group: 10 - Senior Executives**

<b>Class</b>	<b>Goal Placement Rate %</b>
Female	32.22%

**Job Group: 11 - Non-Instructional Managers**

<b>Class</b>	<b>Goal Placement Rate %</b>
Minority	19.18%

**Job Group: 12 - Instructional Managers**

<b>Class</b>	<b>Goal Placement Rate %</b>
Female	60.26%
Minority	18.01%

**Job Group: 15 - Trade & Tech Skills Faculty**

<b>Class</b>	<b>Goal Placement Rate %</b>
Minority	3.47%

**Job Group: 21 - Para-prof;Technology &/or Adm**

<b>Class</b>	<b>Goal Placement Rate %</b>
Female	77.14%
Minority	14.00%

**Job Group: 23 - Computer Program/Network/Help**

<b>Class</b>	<b>Goal Placement Rate %</b>
Female	31.63%
Minority	26.64%

**Job Group: 26 - Craft (skilled)**

<b>Class</b>	<b>Goal Placement Rate %</b>
Female	7.93%
Minority	20.72%

**Job Group: 27 - Operatives (semi-skilled)**

<b>Class</b>	<b>Goal Placement Rate %</b>
Minority	18.21%

**Job Group: PT15 - PT Trade & Tech Faculty**

<b>Class</b>	<b>Goal Placement Rate %</b>
Minority	0.83%

**Job Group: PT19 - PT Prof HR, Fin, Coord; all**

<b>Class</b>	<b>Goal Placement Rate %</b>
Minority	9.34%

**Job Group: PT21 - PT Para-prof;Tech &/or Admin**

<b>Class</b>	<b>Goal Placement Rate %</b>
Minority	12.20%

**Job Group: PT23 - PT Computer Program/Network/He**

<b>Class</b>	<b>Goal Placement Rate %</b>
Female	29.38%
Minority	29.25%

**Job Group: PT24 - PT Student Srv & Instr Support**

<b>Class</b>	<b>Goal Placement Rate %</b>
Female	76.66%

**Job Group: PT25 - PT Administrative Support**

<b>Class</b>	<b>Goal Placement Rate %</b>
Minority	16.02%

**Job Group: PT27 - PT Operative (semi-skilled)**

<b>Class</b>	<b>Goal Placement Rate %</b>
Female	29.17%

## **IV. Development and Execution of Action-Oriented Programs (41 CFR 60-2.17(c))**

Programs have been instituted to ensure no barriers to employment exist. These programs may include, but are not limited to, the following:

1. Conducting annual analyses of job descriptions to ensure they accurately reflect job functions;
2. Making job descriptions available to recruiting sources and available to all members of management involved in the recruiting, screening, selection and promotion processes;
3. Evaluating the total selection process to ensure freedom from bias through:
  - o Reviewing job applications and other pre-employment forms to ensure information requested is job-related;
  - o Evaluating selection methods that may have a disparate impact to ensure that they are job-related and consistent with business necessity;
  - o Training personnel and management staff on proper interview and selection procedures; and
  - o Training on EEO and other related policies for management and supervisory staff.
4. Using techniques to improve recruitment and retention and to increase the flow of qualified applicants, including minority and/or female applicants, undertakes the following actions:
  - o Including the phrase "As an EEO/Affirmative Action Employer all qualified applicants will receive consideration for employment without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, disability, veteran status" or other acceptable tagline in all printed employment advertisements;
  - o Placing employment advertisements in local minority news media and women's interest media;
  - o Disseminating information on job opportunities to organizations representing minorities and women and to employment development agencies when job opportunities become available;
  - o Encouraging all employees to refer qualified applicants;
  - o Actively recruiting at secondary schools, junior colleges, colleges and universities with predominantly minority and/or female enrollments; and
  - o Requesting employment agencies to refer qualified minorities and women.



5. Reviewing organization's compensation practices;
6. Ensuring that all employees are given equal opportunity for promotions and/or transfers.  
This is achieved by:
  - o Posting opportunities internally;
  - o Offering guidance to employees in identifying opportunities, training and educational programs to enhance promotions and opportunities for job rotation or transfer; and
  - o Evaluating job requirements to ensure that they are appropriate.

## **V. Internal Audit and Reporting Systems (41 CFR 60-2.17(d))**

The organization believes that one of the most important elements in effectively implementing a written Affirmative Action Program is an adequate internal audit and reporting system. Through this system, the total program can be monitored for effectiveness, and management can be kept informed. LANE COMMUNITY COLLEGE's audit and reporting system is designed to:

1. Measure the effectiveness of the AAP/EEO program;
2. Document and analyze personnel activities;
3. Identify problem areas and develop action plans where remedial action is needed; and
4. Determine the degree to which AAP goals and objectives have been attained.

The following personnel activities are reviewed, as necessary and desirable, to ensure nondiscrimination and EEO for all individuals without regard to their race, color, gender, religion, national origin, age, sex, sexual orientation, gender identity, pregnancy, genetic information, disability, veteran status, or any other legally protected status covered by applicable state or local law:

1. Recruitment, advertising, and job application procedures;
2. Hiring, promotion, upgrading, layoff, recall from layoff;
3. Rates of pay and any other forms of compensation including fringe benefits;
4. Job assignments, job classifications, job descriptions, and seniority lists;
5. Sick leave, leaves of absence, or any other leave;
6. Training, attendance at professional meetings and conferences; and
7. Any other term, condition, or privilege of employment.

The following documents may be maintained as a component of LANE COMMUNITY COLLEGE's internal audit process:

1. An applicant flow log;
2. Summary data of external job offers and hires, promotions, terminations;
3. Summary data of applicant flow;
4. Employment applications; and
5. Records pertaining to organization's compensation system and decisions.

LANE COMMUNITY COLLEGE's audit system includes periodic review of employment decisions. Managers and supervisors are asked to report any current or foreseeable EEO problem areas and are asked to outline their suggestions/recommendations for solutions. If problem areas arise, the manager or supervisor is to report problem areas immediately to the Chief Human Resources Officer. During the reporting cycle, the following occurs:

1. The Chief Human Resources Officer will discuss any problems relating to substantial disparate impact, EEO charges, etc., with management; and
2. The Chief Human Resources Officer will report the status of the organization's AAP goals and objectives to management. The Chief Human Resources Officer will recommend remedial actions for the effective implementation of the AAP.