LANE COMMUNITY COLLEGE EXECUTIVE ORDER 11246
AFFIRMATIVE ACTION PROGRAM

Plan year 2017

For Females and Minorities

Plan Effective Date: 10/15/2016

Plan Expiration Date: 10/15/2017

AAP Administrator: Dennis Carr, MSIR, SHRM-SCP
Chief Human Resources Officer

Approved by: Dr. Mary Spilde,
President

Establishment’s Name: Lane Community College

Establishment’s Address: 4000 E 30th Ave
Eugene Oregon 97405
LANE COMMUNITY COLLEGE
AFFIRMATIVE ACTION PROGRAM
for
EXECUTIVE ORDER 11246

Minorities and Females
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POLICY STATEMENT

Lane Community College (College) is committed to providing a working and learning environment that is free from discrimination, harassment and retaliation. Lane is committed to equal employment opportunity in education and employment, affirmative action as well as diversity. Lane Community College is also committed to complying with guidelines covering the employment of Veterans and full compliance with the employment of persons with disabilities consistent with the Americans with Disabilities Act. The College prohibits discrimination in employment practices and decisions on the basis of race, color, ethnicity, religion, national origin, gender, sexual orientation, marital status, familial relationships, parental status, disabilities, expunged juvenile criminal record or veterans’ status. This commitments made by the College in accordance with federal, state, and local laws, and regulations.

Inquiries may be directed to the Chief Human Resource Officer, Lane Community College, 4000 30th Avenue, Eugene, Oregon, 97405-0640; 541-463-5585.

College Information:
It is forbidden under Lane Community College Hiring Process Procedures for Human Resources staff to disclose any confidential demographic information provided to the College via employment applications or by current employees. Applicant and employee demographic data is considered strictly confidential.
EXECUTIVE ORDER 11246

AFIRMATIVE ACTION PROGRAM
FEMALES AND MINORITIES

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Affirmative Action Narrative - Plan Year 2017

In accordance with 41 §CFR-2.10 federal contractors are required to administer an affirmative action program to ensure equal employment opportunity in order to achieve equity within the college. In compliance with and in good faith, this narrative text contains the following components: Designation of responsibility for implementation, identification of problem areas, a detailed Action-Oriented program and information on internal audit conditions. Human Resource Recruitment Analyst LynnMarie Chowdhury completed the data analysis for the required reports and the 2017 plan year narrative has been updated by Chief Human Resource Officer Dennis Carr.
Affirmative Action Requirements and Analysis

§60-2.11 Workforce Analysis / Organizational Display

Represents the determination of whether barriers to equal employment opportunity exist in Lane’s Organization (in recruitment, hiring, promotion and transfer of protected class employees). The analysis provides an overview of the workforce that may assist in identifying organizational units where women or minorities are underrepresented or concentrated.

The Workforce analysis is a summary of the Lane’s organizational structure. For each organizational unit, the display includes the following:

- The name of the unit and the job title, race and gender of the unit supervisor
- The total number of male and female incumbents and the total number of male and female incumbents in each of the following groups: Blacks, American Indians, Asians, Hispanics, and whites, other than Hispanics
- Applicants that do not disclose race or ethnicity are counted as white for all reports.

The employment data generated a total 1395 unique employees. The workforce analysis for Plan Year 2017 shows that there are 215 minorities (15.4%) working at Lane.

Department Composition:
There are five departments at Lane that have demonstrated excellence in the recruiting of minorities.

- Social Science
- Language, Literature and Communication
- Counseling
- Custodial Services
- Public Safety

- Custodial Services deserves recognition for its dedication to disabled and minority recruiting. The manager has done extraordinary work to learn, and then assist minority applicants and employees. One employee under this manager was supported in applying to and securing employment 8 levels higher than his original custodial placement in Plan Year 2017
- In the past two years the Interim Dean of Social Science worked diligently to recruit and retain minority professors, showing changes and growth. Particular credit to the dean of this area for his dedication to correcting past shortfalls in minority employment and training his employees.
- Counseling met its minority placement goal last year
- The Language, Literature and Communication Division as well as Public Safety have also demonstrated good progress concerning the recruitment and retention of protected class employees.

Distribution of Minorities:
The workforce analysis reveals that Lane will need to provide training, transfer and promotion assistance to minorities.
In total Lane has 62 hourly classified minorities (482 part time staff, 13%); at least 41 of these employees are being paid at the levels indicated below. These divisions are examples of the severity of the distribution concern. Below are the three departments that may have minorities in non-professional positions only.
Center for Meeting and Learning,
  ✓ 18 minorities all in positions that pay on Salary Level 4, most are casual employees. There are two other minorities in the division that are paid on the lower half to the classified salary schedule, but above level 4.

Facilities, Management and Planning,
  ✓ 12 minorities, all but one minority is employed at the lowest salary level.

Food Services
  ✓ 11 minorities, all paid at salary level 4, except one paid at Level 7.

§60-2.11

✓ Lane's Classified Staff has 51 employees (11.30%) contracted minorities. (450 total classified employees)

Lane’s Faculty has 61 employees (13.6%) contracted minorities. (574 total faculty employees)

✓ Lane’s Entire Management team has 66 employees and (15.2%) contracted minorities
  o Office of Academic Affairs has NO minority executives, 1 minority classified employee
  o President’s Office has 1 minority executive, 1 minority classified employee
  o Non-Instructional Managers have NO minority deans/directors
  o Instructional Managers have 4 (15.38%) minority deans/directors, (17 total employees), no placement goal

The Workforce Analysis also reveals that the following Divisions or Job Groups do not have any disclosed minorities for which demographic information is documented. The number of work areas or departments without minorities is of great concern. It supports the lack of equity in the distribution of racially diverse employees. College direction and involvement is needed to address the issues showed in the WFA so that we become even more aligned with Lane’s strategic directions.

These departments will need focused advertisements on the recruitment of minorities, and focused college recruitment strategies, leadership support and outreach to address the fact that 14 Divisions/Departments do not have any minorities. For Veteran and Disabled workforce analysis see these two separate Affirmative Action Plans.

  • Cottage Grove Center
  • Health Professions Division
  • Health and Safety
  • High School Connections
  • IRAP
  • Foundation
  • Mail Services
  • Marketing and Public Relations
  • Office of Academic and Student Affairs, NO management minorities, lacking males
  • Specialized Support Services
  • Telecommunications/Infrastructure
  • Torch
  • Tutoring
  • Non-Instructional Managers job group
§60-2.11 Workforce Analysis Summary
Lane’s college-wide management team does not represent the diversity of the student. All employment decisions have been approved by the President Mary Spilde or her designated proxy. Lane’s executives were briefed by CHRO, Dennis Carr as required by Affirmative Action Regulations (Plan year 2016 goals and aspirations.).

Reviewing management data, reveals Faculty data show “proportionally” more employees than managers, and do not show the highest proportion of minorities. This indicates that students at Lane may not be seeing faculty that represent their background and appearance in the classroom.

§60-2.12 Job Group Analysis

Definition: A job group consists of the jobs at Lane which have similar wages, content and opportunity.

Beginning with AA Plan Year 2017, Lane will be using the required Affirmative Action SEDS data for determining full-time and part-time faculty job group goals. Previously, the college had been using general US Census data rather than the doctorate data. The purpose of this data is not to show how many employees have a degree, but rather to assist Lane in recruiting and correcting disparities. The accuracy of the SEDS data demonstrates that a dedicated action plan is required for all faculty job groups.

1. Due to the changing nature of work, titles and departments at Lane Community College, Job groups with less than 20 employees were computed using small group computerized analysis.

2. Two technology job groups were realigned based on last year’s job group adjustments
   o Job Group 19/PT 19 – has been expanded to include Coordinators as well as HR and Finance Professionals. This change achieved a large enough job group for analysis.
   o Job Group 23/PT 23 – has been adjusted to include Computer Programming, Networking and Help desk. Each job title has enough similar duties and nature of work to create a statistically effective job group.

3. In order to facilitate easier training and tracking for those who utilize placement goals, PT Faculty and Classified Job Groups now have the same job group number, with PT indicating a part-time position.
   Example: Job Group 13 (Arts & Letters contracted) v. * PT13 (Part-time Arts & Letters)
§60-2.13 Utilization analysis includes the following:

Utilization Analysis is used to identify "major" job groups. The job group is the basic unit for successive affirmative action plan analyses which will build upon it, including an Availability Analysis, and any employment goals which may be established thereafter.

Utilization Analysis
- Placement of Incumbents in Job Groups §60-2.13
- Determining Availability §60-2.14
- Comparing incumbency to Availability §60-2.15

41 §60-2.13 Placement of incumbents in job groups is by number and percentages of females and minorities. Placement goals are used to determine the availability for each job group by percentage of minorities or women and veterans or disabled with requisite skills in the reasonable recruitment area. The Placement goals also determine the percentage of minorities and women among those promotable, transferable and trainable within the company's organization. (Provide raw statistics, value weight, weighted statistics, source of statistics, and reason for weighting.)

41 §60-2.14 The Availability Analysis estimates the percentages of minorities and women available for employment in each identified job group. Availability analysis is defined as "the percentage of minorities or women who have the skills required for entry into a specific group, or who are capable of acquiring them."

Although the definition of a promotion varies from contractor to contractor, the OFCCP definition of promotion and is aligned with the definition used by Lane. A promotion is considered a personnel action that may result in one or more of the following:

- Movement to a position affording higher pay and/or greater rank
- Movement to a position requiring greater skill or responsibility
- Movement to a position that affords the opportunity for upward mobility

41 §60-2.15 To determine female and minority availability (internal and external) for each job group, the OFCCP has developed a set of eight factors which Lane evaluates each plan year. To estimate the availability of minorities and women, OFCCP's regulations require the contractor to "consider" eight availability factors.

- Once the contractor has identified Job Groups and has completed its Availability Analysis, the final step of the Utilization Analysis involves a comparison of the actual percentage employment of minorities and women in each Job Group with the calculated percentage availability of minorities and women to determine if minorities or women are "underutilized" in any major Job Group.

- Lane uses the 80% whole person rule (declares underutilization if the contractor employs less than 80% of the percentage of minorities and women estimated to be available) for calculations.

- Lane’s obligation is to set an annual percentage and/or numeric goal equal to availability for minorities (as a whole) and women for each job group in which underutilization exists. (No goal need be set for "utilized" job groups.) The contractor's obligation is thereafter to demonstrate "good faith efforts" to select minorities and women at the calculated percentage goal in the coming AAP year.
Goal Attainment
Where goals were established for the prior year, Lane developed action-oriented programs designed to accomplish the established goals and objectives, thereby enhancing employment and advancement opportunities in the company for minorities and/or females. Lane’s obligation is to set an annual percentage and/or numeric goal equal to availability for minorities (as a whole) and women for each job group in which underutilization exists.

Goal Attainment Summary:
- Two job groups have met their 2016 Plan year goals: Job group 18 and job group 28
- Only two job groups maintained their no-goal status from 2016 Plan Year
- Every other job group showed a need to focus on action-orientated plans. These numbers indicate that Lane Community College has work to do to improve goal achievement and that broader management support is needed to achieve this.

Summary of Goal Attainment Analysis:
1) Faculty Goals using 2017 SEDS data.
Lane has compared last year’s US Census Data against the US SEDS data. Plan Year 2018 will compare this data to 2017 SEDS data.
- The SEDS data provides a much higher level of academic data assessment accuracy and currency as it is calculated on an annual, calendar basis.

<table>
<thead>
<tr>
<th>Faculty Job Group</th>
<th>2016 Goal Percent %</th>
<th>2017 Goal Percent (SEDS)</th>
</tr>
</thead>
<tbody>
<tr>
<td>13 Arts &amp; Letters Faculty</td>
<td>None</td>
<td>No Goal</td>
</tr>
<tr>
<td>14 Science &amp; Math Faculty</td>
<td>16.00 (minority goal)</td>
<td>21.08% (minority goal)</td>
</tr>
<tr>
<td>15 Trade and Tech Skills</td>
<td>19.86 (minority)</td>
<td>23.75 (minority goal)</td>
</tr>
<tr>
<td>16 Basic Skills Faculty</td>
<td>11.68 (minority)</td>
<td>19.44 (minority goal)</td>
</tr>
<tr>
<td>17 Health &amp; Athletic Faculty</td>
<td>15.41 (minority)</td>
<td>20.19 (minority goal)</td>
</tr>
<tr>
<td>18 Non-Instructional Faculty</td>
<td>59.77 (female)</td>
<td>No goal</td>
</tr>
</tbody>
</table>

- Note that for four faculty job groups, goals have increased, this is reflected in part-time faculty employee data. With the accuracy of SEDS data, we can with great certainty say that the goals for faculty have increased, and that attainment has not been achieved. The PT Faculty Data supports this trend.

2) Management and Classified job groups goals using 2010 US Census Data
- All management and classified goals have increased in Plan Year 2017

<table>
<thead>
<tr>
<th>Management Job Group</th>
<th>2016 Goal Percent %</th>
<th>2017 Goal Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>10 Senior Executives</td>
<td>17.01 (minority goal)</td>
<td>18.20 (minority goal)</td>
</tr>
<tr>
<td>11 Non-Instructional Mgrs</td>
<td>18.92 (minority)</td>
<td>19.51 (minority goal)</td>
</tr>
<tr>
<td>12 Instructional Mgrs</td>
<td>50.96 (female goal)</td>
<td>59.32 (female goal)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Classified Job Group</th>
<th>2016 Goal Percent %</th>
<th>2017 Goal Percent %</th>
</tr>
</thead>
<tbody>
<tr>
<td>19 Professional Coordinators</td>
<td>No goal</td>
<td>15.34 (minority Goal)</td>
</tr>
<tr>
<td>20 Professional HR</td>
<td>No goal</td>
<td>Combined with job group 19</td>
</tr>
<tr>
<td>21 Para-Prof, Tech-Admin</td>
<td>16.16 (minority goal)</td>
<td>No Goal</td>
</tr>
<tr>
<td>22 Technical Support Int</td>
<td>25.07 (minority goal)</td>
<td>Combined with job group23</td>
</tr>
<tr>
<td>23 Computer prof. complex</td>
<td>29.28 (female) 24.81 (minority)</td>
<td>30.24 (female) 17.84</td>
</tr>
<tr>
<td>24 Student Srv Instruct</td>
<td>No Goal</td>
<td>No goals</td>
</tr>
<tr>
<td>25 Administrative Support</td>
<td>14.99 (minority goal)</td>
<td>15.78 (minority goal)</td>
</tr>
<tr>
<td>26 Craft</td>
<td>14.33 (minority goal)</td>
<td>15.51 (female) 16.29</td>
</tr>
<tr>
<td>27 Operatives</td>
<td>No goal</td>
<td>No goal</td>
</tr>
<tr>
<td>28 Service Worker</td>
<td>40.17(female) 25.19 (minority)</td>
<td>No goal</td>
</tr>
</tbody>
</table>
• Management job groups have all increased in terms of needing to strive for better protected class outcomes in job groups. This indicates that management within these departments and recruitment outreach to the external applicant pools and recruitment efforts to attract protected class candidates is necessary as a directed goal for management job groups to comply with best practices from the OFFCP.

• The OFCCP guidance recommends diverse management employees who actively perform their designated responsibilities for Affirmative Action. The analysis indicates that Lane needs to engage in additional efforts toward achieving protected class placement goals by management. Without stronger management support as indicated by the designation of responsibility, Lane will be unlikely to experience an organizational level change.

• The Classified job groups (.50 FTE or greater) analysis reveals that job groups have all increased in percentage goal. PT Classified job groups reflect this data in most cases.

• The service worker job group reflects the minorities working for the lowest wage available in the salary structure. They have moved to a no-goal status. This is especially due to the recruitment work done this past year in custodial services.

• The Board of Education demographics reveal a visual representation of an all-white college board. https://www.lanecc.edu/board/board-members

**41 C.F.R. §60-2.16 Placement Goals**

Placement Goals are determined by “Job Groups.” Job Groups are coded to each job title in the employee data.

• When the percentage of minorities or women employed in a particular job group (see above) is less than would be reasonably expected given their availability percentage in the reasonable recruitment area for that particular job group, the OFFCP guidelines require Lane Community College to establish placement goals.

• Placement Goals should not be confused with “quotas” or “set-asides,” as they are representations used to guide “good faith efforts” to recruit minorities and women into underutilized job groups. Furthermore, placement goals should not be construed as an admission or finding of legal discrimination. Goals are used to monitor progress toward assuring equal employment opportunity.

• The OFCCP has raised concerns about the validity of statistical tests such as the Standard Deviation tests when used for small job groups ≤ 20 employees. Therefore, for plan year 2017 a small comparison statistical test was used for any job group with less than 20 employees.

• The Survey of Earned Doctorates Data (SED) (SOURCE: NSF/NIH/USED/USDA/NEH/NASA, 2008 Survey of Earned Doctorates) provides statistics for research doctorates awarded to U.S. citizens and permanent residents, by field of study, race/ethnicity, and sex. The survey is conducted annually.

• 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.
Selection Disparities
- Affirmative Action refers to the process which require a government contractor to examine and evaluate the total scope of its personnel practices for the purpose of identifying and correcting any barriers to equal employment opportunity. Where problems are identified, the contractor is required to develop a program that is precisely tailored to correct the deficiencies. Where appropriate, the contractor is required to establish reasonable goals to measure success toward achieving that result. When and if there are selection disparities the contractor is required to implement an Action Plan to compensate for past or present discrimination or to prevent discrimination from recurring in the future.

41 C.F.R. §60-2.15 Incumbency v. Estimated Availability Analysis
This statistical analysis is one of the most significant reports Lane uses (and the OFCCP) since it compares the proportion of minorities and females already in a contractor’s workforce against the availability estimate of the proportion of minorities and females in a given recruitment area (as calculated in the Availability Analysis).

a) Pursuant to the requirements of 41 C.F.R. § 60-2.15, Lane Community College has compared the percentage of minorities and women in each job group with the rates of availability for those job groups in the reasonable recruitment areas. Where the percentage of minorities or women was less than would reasonably be expected given their availability, Lane Community College established a goal in accordance with 41 C.F.R. § 60-2.16.

The “YES” that appears in some of the columns on the chart below represent areas where there are either fewer minorities or fewer women in Lane’s current workforce than would be reasonably expected in the given recruitment area.
- For example, a “YES” appears under job group “011 Non-Instructional Managers” for “minority.” This means that under the “80% rule,” the demographic profile of the current Lane workforce in this job group does not come within 80% of the expected proportion of minorities in the reasonable recruitment area.

The reasonable recruitment area for the college varies depending upon the nature of the job assignment. For example, Lane Community College recruits managers and contracted (full-time) faculty nationally and regionally, while classified employees are recruited from a local, state and regional recruitment area depending on complexity of the assignment and placement goals. Diversity recruiting resources are used for posting vacancies in all three employee groups.

When there is a placement goal for either women or minorities in a given job group, “good faith efforts” must be used to create equal employment opportunity for members of these protected classes. It is important to note, that such an analysis does not constitute a de facto finding of discrimination. See the Goal Attainment Summary above.

Job Group Changes
Due to the changing nature of work and new departments at Lane Community College, some job groups have been realigned. In order to facilitate easier training and tracking for those who utilize placement goals, PT Faculty and Classified Job Groups now have PT (part-time) and the same job group number. The college is currently in the process of reorganizing the Student Services area. Next plan year will more than likely require another full job group analysis.

4. Two technology job groups were realigned based on last year’s job group adjustments
- Job Group 19/PT 19 – has been expanded to include Coordinators as well as HR and Finance professionals, this achieved a large enough job group for analysis.
• Job Group 23/ PT 23 – has been adjusted to include Computer Programming, Networking and Help desk. Each job title has enough similar duties, wage range and nature of work to create a statistically effective job group.

• The non-instructional faculty job group has been insignificant in composition for a number of years. For Plan year 2018 this job group will be merged with titles similar in wage and job duties as well as the discipline most closely related.

• Classified job groups from Plan year 2016; Professional HR, Finance has been combined with job group Professional Coordinators due to similar wages, job titles and EEO codes. This has created a large group of 63 employees, which is highly significant vs these job groups being separated as in previous years. The new Job Group #19 Prof, HR, Coord, All, includes media relations. This is reflected in the PT job groups
Incumbency v. Estimated Availability_ Plan Year 2017

Lane AAP_Plan Year 2017  10/15/2016

Comparison Rule

80% with Whole Person Rule
## Incumbency v. Estimated Availability_ Plan Year 2017

<table>
<thead>
<tr>
<th>Job</th>
<th>Femal</th>
<th>Minori</th>
</tr>
</thead>
<tbody>
<tr>
<td>10 Senior Executives</td>
<td></td>
<td>Yes</td>
</tr>
<tr>
<td>11 Non-Instructional Managers</td>
<td></td>
<td>Yes</td>
</tr>
<tr>
<td>12 Instructional Managers</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>13 Arts &amp; Letter Faculty</td>
<td></td>
<td></td>
</tr>
<tr>
<td>14 Science &amp; Math Faculty</td>
<td></td>
<td>Yes</td>
</tr>
<tr>
<td>15 Trade &amp; Tech Skills Faculty</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>16 Basic Skills Faculty</td>
<td></td>
<td>Yes</td>
</tr>
<tr>
<td>17 Health &amp; Athletic Faculty</td>
<td></td>
<td>Yes</td>
</tr>
<tr>
<td>18 Non-Instructional Faculty</td>
<td></td>
<td></td>
</tr>
<tr>
<td>19 Prof HR, Fin, Coord; all</td>
<td></td>
<td>Yes</td>
</tr>
<tr>
<td>21 Para-prof;Technology &amp;/or Adm</td>
<td></td>
<td></td>
</tr>
<tr>
<td>23 Computer Program/Network/Help</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>24 Student Srv &amp; Instruct Support</td>
<td></td>
<td></td>
</tr>
<tr>
<td>25 Administrative Support</td>
<td></td>
<td>Yes</td>
</tr>
<tr>
<td>26 Craft (skilled)</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>27 Operatives (semi-skilled)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>28 Service Worker</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Comparison of Incumbency to Availability is performed using the 80% with Whole Person Rule

Yes indicates 80% Ratio < 80.0 and Difference <= -1.0  80% snapshot - 10/15/2015-10/15/2016_Plan Year 2017
## Incumbency v. Estimated Availability_ Plan Year 2017

10/15/2016

<table>
<thead>
<tr>
<th>Job</th>
<th>Female</th>
<th>Minority</th>
</tr>
</thead>
<tbody>
<tr>
<td>29  Laborers (unskilled)</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>PT13 PT Arts &amp; Letter Faculty</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>PT14 PT Science &amp; Math Faculty</td>
<td></td>
<td>Yes</td>
</tr>
<tr>
<td>PT15 PT Trade &amp; Tech Faculty</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>PT16 PT Basic Skills Faculty</td>
<td></td>
<td>Yes</td>
</tr>
<tr>
<td>PT17 PT Health &amp; Athletics Faculty</td>
<td></td>
<td>Yes</td>
</tr>
<tr>
<td>PT19 PT Prof HR, Fin, Coord; all</td>
<td></td>
<td></td>
</tr>
<tr>
<td>PT21 PT Para-prof;Tech &amp;/or Admin</td>
<td></td>
<td>Yes</td>
</tr>
<tr>
<td>PT23 PT Computer Program/Network/He</td>
<td></td>
<td></td>
</tr>
<tr>
<td>PT24 PT Student Srv &amp; Instr Support</td>
<td></td>
<td></td>
</tr>
<tr>
<td>PT25 PT Administrative Support</td>
<td></td>
<td></td>
</tr>
<tr>
<td>PT26 PT Craft worker (skilled)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>PT27 PT Operative (semi-skilled)</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>PT28 PT Service Worker</td>
<td></td>
<td></td>
</tr>
<tr>
<td>PT29 PT Laborer (unskilled)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Comparison of Incumbency to Availability is performed using the 80% with Whole Person Rule Yes, indicates 80% Ratio < 80.0 and Difference <= -1.080%
§CFR 60-2.17(c) Development and Execution of Action-Oriented Programs

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

b) Conducting annual analyses of job descriptions to ensure they accurately reflect job functions;

c) Making job descriptions available to recruiting sources and available to all members of management involved in the recruiting, screening, selection and promotion processes;

d) Evaluating the total candidate selection process to ensure freedom from bias through:

e) Reviewing job applications and other pre-employment forms to ensure information requested is job-related;

f) Evaluating selection methods that may have a disparate impact to ensure that they are job-related and consistent with business necessity;

g) Training personnel and management staff on proper interview and selection procedures;

h) Lane started the “Cultural Competency Professional Development” in 2015 to begin a series of competency trainings for the college. These have been delivered at college “in-services” and “conferences.” The governance system and the College Board have approved hours for classified employee participation. Faculty and Management have significant schedule flexibility to participate.

i) Through the diversity office an “Equity Lens” view of college systems, infrastructures and people is being established with a five-year roll out plan. This work is being done with an “equity lens” driven approach to develop a culture of respect and inclusion. The “equity lens” work is being rolled out to the college through the Diversity Council and CCPD.

j) Specific action plans will be developed to ensure senior level executives and college leaders are completing the designated responsibilities as part of their daily work. Including:

   a. Specified Executive and Management Training in Affirmative Action implementation
   b. Specified Actions that are accountabilities
   c. Documented Advocacy that benefits Lanes Staff and Students
   d. Application of the Equity Lens to student conduct code and student services
   e. Funding support for divisions that have no minorities or are under utilized
   f. Community Involvement or outreach activities
   g. Ensuring College Board represents affirmative action in decision making.

Using techniques to improve recruitment and retention and to increase the flow of qualified applicants, including minority and/or female applicants, Lane undertakes the following actions:

a) Including the phrase “As AA/EEO/Veteran/Disability 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;

b) Targeted marketing to minorities is done through broad software such as “Indeed”, educational vehicles such as Chronicle, Highered Jobs.com, HERC, and an increasing presence with social media.

c) Complying and disseminating information on job opportunities to organizations representing minorities and women and to employment development agencies when job opportunities become available;

d) Actively recruiting at secondary schools, junior colleges, colleges and universities with predominantly minority and/or female enrollments;

e) Ensuring that all employees are given equal opportunity for promotions and/or transfers. This is achieved by:
   • Posting opportunities internally;
   • Offering guidance to employees in identifying opportunities, training and educational programs to enhance promotions and opportunities for job rotation or transfer; and
f) Evaluating job requirements to ensure that they are appropriate. Retention of employees is supported through Human Resource programs and services such as diversity and inclusion practices, equity assurances and pay practices; alignment with union contracts, internal recruiting and transfer programs, comprehensive benefit plans for all employee groups; including the opportunity for part-time faculty to receive full contracted benefits when eligible.

  a. Other retention activities are done through the diversity office, Office of Academic and Student Affairs, and Professional Organization and Development

g) Human Resources and college divisions/departments are actively encouraged to adjust and change advertising practices to target specific disciplines and job groups where there are placement goals and equalizing the available resources across college departments for faculty and classified staff.

h) Requesting and providing specific recruiting resources for designated outreach to specific groups such as qualified disabled and veteran candidates requiring affirmative action steps.
Our Affirmative Action Software vendor “PeopleFluent” has added features to the program that allow for a more robust analysis, including compensation and goal attainment. This has improved and refined assessments of the recruitment processes. In conjunction with the recruitment software (PeopleAdmin) Human Resources Recruitment analysts are able to enhance our data assessment abilities and more selectively monitor the recruitment and selection processes for evidence of challenges to equal employment opportunity.

Compensation Disparities

Compensation disparities on the basis of gender, race or ethnicity are not a problem at Lane Community College for EEO/AA purposes due to seniority practices dictated by the Classified Union, Faculty Union, and Management Working Conditions Agreements. New employees are placed on the respective salary schedules based upon objective assessments of knowledge, skills, abilities, education, and experience. Initial salary placement criteria are outlined in the collective bargaining agreement. For all current employees, there is an appeal process to assure equity and accuracy in pay levels for employees with similar responsibilities, knowledge, skills, abilities, education, and experience.

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:

a) Recruitment, advertising, and job application procedures;
b) Hiring, promotion, upgrading, layoff, recall from layoff;
c) Rates of pay and any other forms of compensation including fringe benefits;
d) Job assignments, job classifications, job descriptions, and seniority lists;
e) Sick leave, leaves of absence, or any other leave;

f) Training, attendance at professional meetings and conferences;
and

g) Any other term, condition, or privilege of employment.

Lane Community College’s audit system includes periodic review of employment decisions. Managers and supervisors have been asked to report any current or foreseeable EEO problem areas and are asked to outline their suggestions/recommendations for solutions. Lane shall work to improve the managers understanding of what is an EEO issue. If problem areas arise, the manager or supervisor is to report problem areas immediately to the AAP Administrator. During the reporting cycle, the following occurs:

1. The AAP Administrator will discuss any problems relating to substantial disparate impact, EEO charges, etc., with management;
2. The AAP Administrator will report the status of the company’s AAP goals and objectives to management.
   The AAP Administrator will recommend remedial actions for the effective implementation of the AAP.
41 §CFR 60-2.17(a) Establishment of Responsibilities for Implementation of the Written
Affirmative Action Program.

The responsibilities of the Affirmative Action team and Chief Diversity Officer, supervised by Dennis Carr,
CHRO, 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:
   • Measures the effectiveness of the Affirmative Action
     Program;
   • Determines the degree to which AAP goals and objectives are
     met; and Identifies the need for remedial action
5. Keeping company’s management informed of equal opportunity progress and
   reporting potential problem areas within the company through reports;
6. Reviewing the company’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 company’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.

These steps may include, but are not limited to the following:

a) Working with administrators, managers and search committees to determine
   appropriate outreach to attract qualified applicant pools;
b) Publishing job advertisements in newspapers and/or magazines that target minorities and/or
   females;
c) Tuition reimbursement to employees to obtain training that will increase chances of
   advancement;
d) Using recruitment companies that specifically target minorities and/or females; and

e) Continuing to use the services of the respective Employment Service Delivery System,
   Oregon Employment Division.
41 §CFR 60-2.17(a) Establishment of Responsibilities for Implementation of the Written Affirmative Action Program

Designation of Responsibilities of AAP Administrator
In accordance with 41 §CFR-2.10 federal contractors are required to administer an affirmative action program to ensure equal employment opportunity. In compliance with and in good faith, this narrative text contains the following components: Designation of responsibility for implementation, identification of problem areas, a detailed action-oriented program and information on internal audit conditions. Lead Human Resource Recruitment Analyst 2, LynnMarie Chowdhury completed the data analysis for the required reports and the 2014-2015 narrative has been updated by Chief Human Resource Officer Dennis Carr.

The responsibilities of the Affirmative Action team and Chief Diversity 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:
   a) Measures the effectiveness of the Affirmative Action Program;
   b) Determines the degree to which AAP goals and objectives are met; and
   Identifies the need for remedial action
5. Keeping company’s management informed of equal opportunity progress and reporting potential problem areas within the company through reports;
6. Reviewing the company’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 company’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.


President - Mary Spilde
Assure compliance with equal employment opportunity/affirmative action requirements and participates in the resolution of various legal and complaint issues. Responsible for the indirect oversight of internal and external processes while ensuring overall compliance with the college’s Affirmative Action and Equal Employment Opportunity (AA/EEO) plan and policies.

Vice President (s) – Dawn DeWolf
Assure compliance with equal employment opportunity/affirmative action requirements and participates in the resolution of various legal and complaint issues. Ensure staff development on diversity, inclusive classroom climate, and respectful learning and working environment issues.

Executive Deans and Program Directors
Assure the implementation of the College's Affirmative Action and Equal Employment Opportunity concerning policies, goals, and timetables in assigned areas. Ensure staff development on diversity, inclusive climate and respectful learning and working environment issues.
Chief Human Resource Officer - Dennis Carr
Under the direction of the College President, Lane’s Human Resources Dept. and the Chief Human Resource Officer (CHRO), staff in the President’s Office and Human Resources Department advise on problem areas and coordinate investigations and resolution of complaints.

- The President, the Chief Diversity Officer and the Chief Human Resource Officer are responsible for overall review of college compliance with applicable state and federal laws. Working through the President’s Office and the Office of the Chief Diversity Officer, the Chief Human Resource Officer is responsible for ensuring completion and implementation of the annual AA Plan update, and compliance with the AA/EEO plan.
- Personnel assigned to complete the AA Plan data analysis are responsible for analyzing and presenting accurate and verifiable data, annually and in a timely manner, consistent with OFCCP guidelines. The Narrative and Placement Goals are for use of the community, College Leadership Team, Diversity Office, Union Leadership and diversity council.

Human Resource Recruitment Analysts

- The Human Resource Recruitment Analysts assigned to support recruitment, in collaboration with the CHRO, President’s office, the office of the Chief Diversity Officer and diversity subject matter experts, are responsible for research and implementation of EEO/AA recruitment equity practices while communicating with individuals and agencies inside and outside of the college; including staff, students, the public, community leaders, civic and grassroots organizations.
- Personnel assigned to complete the AA Plan data analysis and HR Analysts assigned to perform recruitment duties may be called upon to provide expert guidance to the Executive Team, college managers and other interested parties upon request. The Chief Human Resource Officer (CHRO) is responsible for assuring that Lane’s affirmative action programs contain a diagnostic component which includes five (5) required quantitative analyses that are designed to evaluate the composition of the workforce and compare it to the composition of the 3 relevant labor pools.
- The CHRO and the HR Recruitment Analysts are responsible for the development of action-oriented programs in response to the analyses. As part of the Affirmative Action programs, the Human Resources Analysts responsible for recruitment monitor AA/EEO practices and outcomes during all phases of the recruitment process. This includes reviewing placement goals and informing the Chief Human Resource Officer of all concerns.

College Managers and Administrators
Assure the implementation of the College’s Affirmative Action Plan and Equal Opportunity polices, goals, and timetables within the Human Resources Department (www.lanecc.edu/afirmact/home.htm). Actively support staff development on diversity, inclusive climate, and respectful learning and working environment issues.

Department/Division Deans and Directors(s)
Provide leadership in the development of multicultural and diversity-based curricula in instructional areas as well as staff development in these areas. Provide leadership in the implementation of Division and College-wide diversity initiatives College managers must maintain awareness of placement goals and utilize placement goals as well as good faith efforts to guide recruitment efforts for part-time and full-time employees in all three employee groups.

Recruitment Committee Chair(s)
Under the guidance of the Chief Human Resource Officer and the HR Analysts assigned to recruitment duties, Search Committee Chairs and Committee Members are responsible for ensuring diverse hiring committees and ethical hiring practices that reflect the College Affirmative Action goals and action-oriented program. Search Committee Chairs and Co-chairs are required to participate in training concerning EEO/AA guidelines.
41 CFR 60-2.17(a) The Responsibilities of the Lane Community College Management group is to Ensure Implementation of the AAP In implementing this written Affirmative Action Program, it is the responsibility of the company’s administrators, supervisors and managers to work with the Human Resources and the Chief Diversity Officer to:

- Assist in the identification of problem areas, formulating solutions, and establishing departmental goals and objectives when appropriate;
- Review 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.
- Ensure documentation, posters, legal announcements are posted as required.
- Managers are trained in Affirmative Action basics, placement goals and availability.

ANALYTICS

§60-17(b) and §60-3 Supporting Documentation:
(Applicant General Data)

As of Plan Year 2017, Lane is beginning to use analytics to monitor Female and Minority recruitment and hiring patterns at a deeper level.

The data below is in the development stage and is being provided to demonstrate Plan Year 2017 Action Orientated requirement for detailed analytics.

KEYS:
- For Plan Year 2017, only generalized analytics are available, and may need further development.
- Applicant pools, being open for the entire academic year, skew data on time to fill
- These are demonstrations of current applicant trends

ANALYTIC REPORTS:

1. Applicant Gender Distribution
2. Applicant Racial/Ethnicity Distribution
3. Time to Fill Reports
   a. Organization
   b. Division
4. Hired Applicants
   a. Minorities
   b. Females
Time to Fill Report

- Our Main Application Type for all employee groups spends an average of 40 Days from the time a manager starts developing it until posting.
- The delays for postings appear to be occurring at the front end during the executive leadership approval process; this is especially true in the past two years due to budget concerns.

KEYS:

- For Plan Year 2017, only generalized analytics are available, and may need further development.
- Applicant pools, being open for the entire academic year, skew data on time to fill
- These are though, a reflective demonstrations of current applicant trends

Historical Applicant Pool Data: 10/2015 – 10/2016, combined with Current Applicant Data, 10/2016 -04/2017
The average time to fill contracted positions by departments is affected by leadership approvals, developing the posting, getting a second set of approvals, then time in budget (the budget team does an excellent job of moving postings within 1-2 days.) workloads, difficulty in recruiting, search committee delays over development of search materials (a major issue) and reference check process which in its current methods can add more than two weeks to the search process. These conditions effect time to fill.

New manager chair training, search committee chair trainings are happening simultaneously with position approval in most cases.
HIRED REPORTING ANALYTICS

- Historical Applicant Pool Data: 10/2015 – 10/2016, combined with Current Applicant Data, 10/2016 -04/2017

55% Female Recruitments/Hired By Department

15% Minority Recruitments/Hired by Department