

LANE COMMUNITY COLLEGE AFFIRMATIVE ACTION PROGRAM
Plan Year 2018

**Office of Federal Contract Compliance Program for
Protected Veterans and
Section 503 Disabilities (ADAAA)**

41 CFR Part 60–300 revised
41 CFR Part 60–741 revised

- i. VEVRAA prohibits federal contractors and subcontractors from discriminating in employment against protected veterans, and requires these employers to take affirmative action to recruit, hire, promote, and retain these Veterans. As revised, the regulations strengthen the affirmative action provisions of the regulations to aid contractors in their efforts to recruit and hire protected veterans and improve job opportunities for protected veterans.
- ii. Section 503 of the Rehabilitation Act of 1973: Section 503 prohibits federal contractors and subcontractors from discriminating in employment against individuals with disabilities (IWDs), and requires these employers to take affirmative action to recruit, hire, promote, and retain these individuals. As revised, the regulations strengthen the affirmative action provisions to aid contractors in their efforts to recruit and hire IWDs, and improve job opportunities for individuals with disabilities. The regulations also include changes to the nondiscrimination provisions to bring them into compliance with the ADA Amendments Act (ADAAA) of 2008.

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I. Policy Statement on Equal Employment Opportunity for Protected Veterans [41 C.F.R. §60-300.44(a)]

Lane Community College is committed to the principles of affirmative action and equal employment opportunity for protected veterans. Therefore, it is the policy of Lane not to discriminate because of protected veteran status and to take affirmative action to employ and advance in employment qualified protected veterans at all levels within the college. Lane will ensure that all employment actions, including but not limited to recruitment, hiring, selection for training, promotion, transfer, demotion, layoff, recall, termination, rates of pay or other forms of compensation, will be administered without regard to status as a protected veteran. Lane will also provide qualified applicants and employees who are disabled veterans with needed reasonable accommodations, as required by law, and will ensure that all employment decisions are based only on valid job requirements.

Lane prohibits harassment of employees and applicants because they are protected veterans and will take efforts to try to prevent any harassment or discrimination before it occurs. Lane 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 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.

Lane's policy regarding affirmative action and equal employment opportunity, is demonstrated in a written Affirmative Action Program (AAP) that sets forth the policies, practices and procedures that Lane is committed to in order to ensure that its policy of nondiscrimination and affirmative action for qualified protected veterans is accomplished. This AAP is available for inspection by any employee or applicant for employment upon request, during normal business hours in the Human Resource Office, 4000 E 30th Ave, Eugene Oregon, or online at <https://www.lanecc.edu/affirmativeaction/affirmative-action-mission>. Contact: Dennis Carr, Chief Human Resources Officer, carrd@lanecc.edu, (541) 463-5585.

Confidential Trade Secret Materials

The material set forth in the AAP is deemed to constitute trade secrets, confidential 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.

II. Review of Personnel Processes [41 CFR60-300.44(b)]

To comply with the requirement to “periodically review” its personnel processes, Lane should be reviewing its processes with a detailed annual review to determine whether its present procedures assure careful thorough and systematic consideration of the qualifications of known protected veterans. As part of this review, Lane will also ensure that its personnel processes do not stereotype veterans with disabilities in a manner which limits their access to all jobs for which they are qualified. In conducting this review, Lane uses the procedures suggested in Appendix C to 41 C.F.R. § 60-300. The required review, when completed, will cover all procedures related to the filling of job vacancies either by hire or by promotion, as well as to all training opportunities offered or made available to employees.

a. Reviewing veteran personnel processes

Lane has conducted a review of the veteran preference point process. Results, with feedback from veterans found the process simple and accessible, Review of Veteran Preference on contracted classified, management and faculty full-time searches was established beginning in 2015. With the second review of veteran process, it is very clear that Lane needs to implement improvements to assure preference considerations are applied equitably for all veterans, particularly part-time veterans. For FY 2018 Lane needs to review its hiring initiatives, terminations, layoffs, advancement, resignations and promotions for compliance and support with veterans, minorities and those with disabilities. Lane needs to assess whether Equal Opportunity Employment are adverse or disparate in nature.

- **Part-time Classified and Part-time Faculty** veteran preference processes need to be improved for all part-time searches. Part-time faculty and classified employee job searches are conducted in a decentralized manner, and Lane HR will need to be intentional about clarifying the requirements for all veteran and disabled candidates in part-time searches to receive equitable and/or preferential treatment when mandated. Lane expects to bring consistency to applying veteran preference to part-time positions in FY 2018.

b. Reviewing Disability personnel processes

Lane also needs to complete a full review of disability processes for Lane employment and the college. Lane hiring initiatives, terminations, layoffs, advancement and promotions of disabled individuals also needs to be fully assessed. Lane Human Resources is compliant in providing accessibility accommodations regardless of disability to new and current employees; an OCR review conducted in the winter of 2015 confirmed that over 25% of all full-time Lane employees are provided some type of reasonable accommodation for disabilities or perceived disabilities.

Lane’s commitment to support accessibility is evident and confidentially documented. Training on supervision and accommodations for managers, staff and teachers of record should be conducted on an annual basis. During the search chair training, only a few minutes are spent on bias and discrimination in the search process and how to provide very simple immediate accommodations for candidates in an interview. Lane’s action plan for veterans and those who are disabled must include a review of the part-time processes in recruitment. In FY 2018 Lane will need to assess whether Equal Opportunity Employment for veteran and disabled candidates are as fully assured as intended or required.

- **Part-time Classified and Part-time Faculty** searches are not monitored to support those who are disabled. These searches are managed in a decentralized fashion, and except for confidential disability disclosure at the application level, no information is exchanged. Human Resources does not look at each part-time search for Veterans or Disabled individuals, and is unable to do so due to capacity. Managers and employees who lead these decentralized searches need to be trained on both disability accommodations and veteran rights.

c. Ensuring accessibility of personnel processes

Lane will ensure applicants and employees are given full support during a job application process, or in any part of an interview for employment. Disabled Veteran employees are provided accommodations in support of employment success and productivity. Lane Human Resources provides ready access to key systems for many applicants and employees with disabilities. As part of our online job application system, Lane has ensured that human resources office or appropriate contact information is prominently displayed to facilitate requests for reasonable accommodation from applicants with disabilities.

d. Training Review

OFP requires a review of training opportunities offered or made available to employees in alignment with Appendix C to 41 C.F.R. § 60-300 for Veterans. Lane has provided two trainings to employees regarding Veterans. Completed in Spring and Fall Terms of 2017, the training focused on the Veteran project video and suicide. The activity was led by Lane's Student Veterans Office to help faculty and staff work with Veteran Students. It was not focused on recruiting or retaining Veterans in employment.

Training needs to be conducted for managers and college leaders on the requirements of the VEVRAA law. Lane's Veteran action plan will need to focus on conducting more than one annual training for protected individuals, including topics such as Veteran Preference and Veteran Outreach.

Human Resource Recruitment staff have attended more than one training on Veterans in employment. Including webinars, self-education research on DOL and Veteran preference, contacts with OFP Seattle Office, Local Veteran services and the Oregon Employment Department Veteran liaisons. In 2014 Lane hosted a small recruitment event for Human Resource employees in other community colleges to discuss Veteran preference and its application of the new laws. It would be beneficial for Lane to establish consistency in outreach to other community colleges and see how they are recruiting, supporting and honoring employee Veterans as well as finding out how and what Veteran trainings are delivered to staff.

The OCP Training Requirements below must be fulfilled in FY 2018 for Lane to become compliant. These trainings must be offered on an annual basis. Robust trainings may be provided in multiple forms. Training must also be done upon joining the college as a new employee.

OFCCP Training Requirements: Title 41 60-741.44 and CFR 60-300.44(j)]

Training: all personnel involved in the recruitment, selection, promotion, disciplinary or related processes shall be trained to ensure that commitments in the affirmative action program are implemented. Managers are responsible for ensuring veterans and individuals with disabilities are afforded access to the same services as all other employees, and training is required to be compliant.

Federal and State Training Requirements:

- a. Training on Affirmative Action (Executive Order 11246 as amended)
- b. EEO/Discrimination (Executive Order 11246 as amended)
- c. ADAAA / VEVRRA (Section 503 of the Rehabilitation Act of 1973, as amended, 29 U.S.C. 793)
- d. Drug and Alcohol awareness (The Drug Free Workplace Act)
- e. Ethics and code of conduct (Part 2,3,52 of the Federal Acquisition Regulations)
- f. Sexual Harassment (Title IX, Board Policy BP 630, Executive Order)

- e. **Invite all applicants to self-identify as a protected veteran or Individual with a disability before an offer of employment is made.** During the application process applicants are offered the voluntary option to complete three demographic forms for Veteran, Disabled and Minority/Gender disclosures, in compliance with 41 CFR 60-300.42(a) The OMB controlled forms have been used as recommended by the OFP, in lieu of creating a unique Lane form for data collection. Only Human Resource personnel have access to the voluntarily disclosed data.

Lane has been inconsistent in collecting and recording post-offer Veteran Data from new employees in compliance with 41 CFR 60-300.42(b). A modification is being made with the collection forms in the New Employee Orientation process that will help Lane to improve in collecting data and in supporting Veterans in employment. Self-identification data storage has yet to be defined, and must be solidified in FY 2018.

f. **Applicant Flow Tracking**

Lane recognizes that it must collect applicant and hiring data to comply with the requirements of 41 CFR 60-300.44(k). In order to facilitate accurate tracking Lane uses Applicant Tracking Software designed by PeopleAdmin. Lane has been using this tracking system since January 14, 2008. Records are maintained within the applicant database.

g. **Documentation and Assessment of Outreach and Recruitment Activities**

Lane completed some limited veteran outreach until FY 2016, including recruiting presence for at least one job fair that included veterans. At this time, Lane is actively seeking veteran and disabled candidates at career fairs, personal contacts in the veteran community, working with two agencies, and through providing resources for veterans on campus. Some recruitment staff attended a Veteran Training to bring awareness to the human resources recruitment of the need for a more robust effort. Lane will institute procedures to improve compliance with the requirements of this part and will conduct its second annual assessment with data collected during the AAP FY 2018. A process for tracking was used in 2017 and has been updated to be more effective for this plan year.

To assess the effectiveness of the totality of our outreach and recruitment efforts for veterans the disabled, as required by 41 CFR 60-300.44(f)(3) utilize PY 2018 as the benchmark to improve activities and create an action plan.

Lane is assessing the totality of Lane Community College efforts:

1. To what extent did the activity attract qualified protected veterans and IWD's?
2. To what extent did the activity result in the hiring of qualified protected veterans and IWD's?
3. To what extent did the activity expand Lane's outreach to protected veterans in the community?
4. To what extent did the activity increase Lane's capacity/capability to include protected veterans and IWD's in its workforce?

If Lane concludes that the totality of its efforts were not effective in identifying and recruiting qualified protected veterans, Lane will explore and implement alternative outreach and recruitment methods. Lane will continue to document its outreach and recruitment activities and its assessments of these activities, and retain these documents for three years.

III. Review of Physical and Mental Job Qualification Standards [41 CFR 60-300.44(c)]

Lane needs to complete a comprehensive assessment or evaluation in FY 2018 of Physical and Mental Health Job Qualities across job groups or classified classifications in the college. Training in physical demand/capacity assessment is necessary to ensure consistency across job specifications.

For the classified and management groups the college is in the process of assessing its job duties and titles in relation to the real market in a compensation study. This work, will help to move the college forward with position determinations and assessments of physical qualifications.

Lane ensure compliance by using only job qualifications standards that are job related and consistent with business necessity and safety.

In order to be compliant, Lane must take the following actions in PY 2018.

- a. Review the classified classification job specifications and ensure all postings and positions are consistent with the same physical and mental qualifications.
- b. Positions and postings must be reviewed every three years after FY 2018 need detailed review.
- c. Continue to ensure conditional employment related to physical and mental health job qualifications is clear at the time of application.
- d. Affirm that Lane will review physical and mental job qualifications whenever a job vacancy is filled through hiring, promotion or transfer.
- e. If a medical exam is requested Lane will ensure that such inquiries or exams will be conducted in accordance with VEVRAA regulations and that information obtained as a result of the inquiry or exam will be kept confidential, except as otherwise provided for in the VEVRAA regulations.
- f. Veterans who have disclosed a disability will be assessed for accommodations upon job acceptance. This work will be done by the ADA Coordinator located in Human Resources.

IV. Reasonable Accommodation [41CFR60-300.44(d)]

Lane will continue its longstanding commitment to making reasonable accommodation to the known physical or mental limitations of qualified disabled veterans unless such accommodation would impose an undue hardship on the conduct of its business. Lane has been committed to engaging in an interactive process with the person requesting the accommodation (or their representative), as needed, to determine an appropriate accommodation. Undue hardship will be determined by assessing whether the requested accommodation, and any other potential accommodations, would cause significant difficulty or expense, as provided for in the VEVRAA regulations.

When an employee with a known disability has significant difficulty performing his or her job and it is reasonable to conclude that the performance problem may be related to the known disability, the employee is confidentially notified of the performance problem and asked if the problem is related to the disability. If the employee indicates that the performance problems are related to his or her disability, the employee will be asked if reasonable accommodation is needed.

Lane will continue to ensure that all requests for reasonable accommodation and any medical or disability- related information provided to LANE will be treated as confidential medical records and maintained in a separate medical file. Lane strives to be a model employer; all accommodations procedures will be done using the guidance in Appendix B of the Section 503 disability regulations at 41 CFR Part 60-741.

V. Anti-Harassment Procedures [41CFR60-300.44(e)]

Employees and applicants of Lane Community College will not be subject to harassment because of protected veteran status. Any employee or applicant who believes that they have been subject to harassment because of their status as a protected veteran should promptly contact a manager in their chain of command, or promptly contact the Chief Human Resources Officer at 541-463-5585, carrd@lanecc.edu of Human Resources for assistance. Employees or applicants may also file a written complaint with Chief Human Resources Officer, Lane Community College, 4000 E 30thAve, Eugene OR,97405.

Retaliation, including intimidation, threat, coercion, or discrimination, against an employee or applicant because they have objected to discrimination, engaged or may engage in filing a complaint, assisted in a review, investigation, or hearing or have otherwise sought to obtain their legal rights under any Federal, State, or local EEO law regarding protected veterans is prohibited. Anti-harassment training requirements for managers has been done on an intermittent basis.

In order to be fully compliant, Lane must take the following actions in FY 2018.

- a. Lane is required to establish a robust anti-harassment training program to be delivered to all managers on an annual basis.
- b. Training documentation and tracking of content, attendees and follow-up activities must be kept on file in a secure manner, accessible to OCP auditors.
- c. All new managers, and if supervisory, shall be required to take harassment training upon hire.
- d. The contractor must develop and implement procedures and training to ensure that its employees are not harassed on the basis of disability. § 60-741.44

VI. External Dissemination of Policy [41 CFR60-300.44(f)]

Lane must provide full written notification of Its Equal Employment Opportunity and Affirmative Action policy regarding the employment of protected veterans to all current subcontractors, vendors, and suppliers.

Lane is compliant in ensuring that State employment agencies, local employment service delivery systems are aware of all job openings and that they are made available to veterans. Individual support is offered as needed.

In order to be fully compliant, Lane must take the following actions in PY 2018.

- a. Review and update the EEO/Affirmative Action text in vendor documents, ensure all contractors have been formally notified via written communication of Lane Community College's Affirmative Action and EEO policies. [41 CFR60-300.44(f)]
Examples where annual review would occur: Facilities Management and Planning, Center for Meeting and Learning, Food Services, Specialized Support Services, Purchasing and College finance, Human Resources, Consultants and Information Technology software contracts.
- b. Provide written notification to new subcontractors, vendors, and suppliers upon entering into a relationship with them. This includes purchasing contracts and maintenance contracts of any duration.

- c. Ensure Lane's Affirmative Action Policy for qualified, protected veterans is provided to the State Employment Service annually.
- d. Notify educational institutions and social service agencies, of the company's policy concerning the employment of qualified protected veterans, notification of positions is made through the online website and the state employment service

VII. Veteran and Disability Outreach and Positive Recruitment Activities [41 CFR60-300.44(f)]

In FY 2016 it was recognized that Lane needed to begin more robust veteran outreach. Most activities below are representative of veteran and disability outreach recruitment program. For FY 2018 these initial outreach activities should be expanded and include training where needed. Disability recruitment will benefit from managers having the required trainings.

In 2016 Lane added expanded friendly and inclusive veteran text to all postings. Unique Veteran announcements about how to submit documentation were placed within the online application system. Direct phone numbers to analysts are given for ease of access. Veterans send their documentation directly to an analyst in Human Resources to ensure confidentiality.

a. Supporting and Positive Outreach Record

October 15, 2016 – October 15, 2017

Recruitment Outreach	Date of Activity	Description	Outcome
Contacted Vet Service Center	November 2017	Seeking job seeker contact, outreach assistance and referrals.	Phone call revealed that this was a service center and they could not help with outreach. (Chowdhury)
Contacted Veteran Employment Specialist, Rob M. at the Employment Department.	November 2017	Exploring vet preference for coast guard members; discussed preference points;	Rob agreed to review veterans on a case by case basis and give a direct referral to HR recruitment as needed (Chowdhury)
Internal: to managers	On-going	Provided free veteran advertising resources to managers via email; encouraged use of military news Employment sites. Trained other analysts in Veteran Recruitment	Some anecdotal increase in Veteran recruitment. Acceptance of veteran preference is now fully honored in contracted positions (Chowdhury)
Internal – Veteran Hiring Initiative	November 9, 2017	Held first annual employee veteran luncheon as part of the veteran hiring initiative and recognition goals	Positive feedback from Veteran Employees that Lane had finally recognized their service and ensured their rights (Chowdhury/Hamilton /Rowlett) 31 attendees

External – Contacted Veteran personnel who presented at the SHRM Veteran training.	Spring 2017	Panel training on recruiting and hiring veterans. MOS – employment Skills discussions	Very helpful in confirming the best approach to Veteran implementation at Lane (Chowdhury)
Internal Notification – HIRE VETS MEDALLION PROGRAM	November 2017	Seeking to expand our veteran program to a much more rewarding and recognizable quality program to attract employees. The Medallion program will recognize qualifying companies with a HIRE Vets Medallion Award, for their commitment to recruit, employ, and retain America’s military service veterans .	Promoted Hire Medallion Vets program to Human Resource Managers, and employee veterans. – No outcomes, no interest generated through communications. No resources allocated at this time, limited capacity to implement robust programs (Chowdhury)
External: Lane ESD Diversifying Workforce	October 2016	Hiring teachers and other education professionals of color	Discussion of effective strategies for recruiting and retaining educators of color (Evans) No hiring
Internal: Project 22 Screening and Veteran Panel	May 2017	Educate Students, staff, faculty and community members on Veteran Suicide	Feedback shows interest was developed, 46 attendees (Vasquez, Student Veteran office) No hiring
Internal Students: Veteran Welcome	September 2017	Education on transition from military to institution of higher learning	Identified connections to Staff, how to articulate their transitional experience, resources, academic policies and procedures (Vasquez, Student Veteran office) No hiring
External: Disability Fair – including Veterans	September 2017	Opportunity to discuss open positions with protected class community members and students	Veterans were in attendance, though none were hired or interviewed for a position. See Disabled AAP for other outcomes (Blunt/Chowdhury) 1 Veteran recruitment, spoke to 51 Vets
Lane Community College Job Fair/ Career Expo	September 2017 April 2017	Opportunity to discuss open positions with community members and students	Some Veterans in attendance, but not focus of fair. No hires, but had phone calls with Vets, in many cases we did not have open positions that met the skills set. (Blunt/Chowdhury)

Insight Disability Career Fair	April 2017 October 2017	Opportunity to discuss open positions with disabled veterans and individuals with disabilities	Great exposure for Lane's goal of increasing employment of those with disabilities. April Fair, 3 IWD's were hired by Lane due to intervention and training with manager; October Fair Hired 1, and re-placed another IWD into part-time assignments. Connected 2 individuals who desired to attend Lane to appropriate resources for their degree interest Established relationships with Vocational Rehab counselors, Case managers and Worksource experts on our application support services for IWD.
Individuals with Disabilities – Live Resume	May 2017	Opportunity to discuss open positions with disabled veterans and individuals with disabilities	Assisted 4 individual's post event with unique support services and assistance to ensure accessibility in interviews. 2 IWD were placed into Part-time assignments, strengthened relationship with Pearl Buck Center, Insight, other attending agencies. (Chowdhury)
Marketing Outreach	On-going	Develop outreach to the larger community to attract and re-inform our brand as a diversity friendly employer. Use of diverse imagery	In all marketing materials, use imagery showing diversity in age, ethnicity and gender as well as messaging around differing educational aspirations. We also select advertising channels that reach diverse audiences. (Rowlett)
Marketing Outreach	On-going	Expanding student recruitment into Spanish outlets Use of diverse Imagery	The radio commercials on La Que Buena and Radio Unica were read in Spanish to support outreach to the Latino community. (Rowlett)
Marketing Outreach	On-going	Reaching out to social media to expand Lane's national presence and promote our diverse student base	YouTube ads consist of short video clips portraying life at Lane. They include visuals showing students of different ages, genders and ethnicities. Ads were set up with specific age and geographic targeting. (Rowlett)
Pearl Buck Center Outreach	On-going	To establish a hiring initiative with Pearl Buck and bring attention to our IWD friendly institution.	Developed relationship, invited to participate in activity in coming year, informed of our support for IWD employment (Chowdhury) No hires yet.

b. Data for Veterans Candidates and Employees:

Veterans:

Assessment of Effectiveness of Totality for Veteran Outreach/Recruitment Efforts:

Lane has increased the number of Veteran Application submissions. More Veterans are providing documentation which allows preference assessment. Those that do not provide documentation are not considered preference point eligible by Veteran regulations. Improved data collection methods in Plan Year 2017 were evident in the incumbent count. For Plan Year 2018, there are 1340 employees.

- **Lane Community College, in totality, Lane did not meet the 7% aspirational goal for FY 2018**
 - **4.10 % incumbency vs aspirational goal of 7.00%** Documentation attached.

Veterans	Plan Year 2018
Hired	8 Vets / 11.5 % of applied vets
Applied	69 Veterans / 3587 applicants = 1.92 %
College Total Veterans	55 incumbents / 1340 employees = 4.10 %
<i>Less than 80% whole person rule: 12 job groups with placement goals</i>	
<i>Lane did not meet the aspirational benchmark of 7.00%</i>	

- **Lane Community College, in totality, Lane did not meet the 7% aspirational goal for FY 2017.**
 - **1.30% incumbency count vs aspirational goal of 7.00%** Documentation attached

Veterans	Plan Year 2017
Hired	9 Vets / 25.7 % of applied vets
Applied	35 Veterans / 3157 applicants = 1.10 %
College Total Veterans	18 incumbents / 1395 employees = 1.29 %
<i>Less than 80% whole person rule: 16 job groups with placement goals</i>	
<i>Lane did not meet the aspirational benchmark of 7.00%</i>	

c. **Data for Disability Candidates and Employees:**

Individuals with Disabilities:

Assessment of Effectiveness of Totality for Individuals with Disabilities Outreach/Recruitment Efforts

Lane has not requested confidential disability demographics on a regular basis until FY 2017. No applicants have indicated a voluntary disclosure of disability by using the OMB control form within the Applicant Tracking System. Lane will continue strengthening its tracking system and an annual schedule of outreach to agencies and college staff.

More assessment is needed on accuracy of data collection in this highly confidential area.

Lane provides substantial disability accommodations, and is proud that so many employees are receiving support in the form of modifications and business necessary tools and equipment. Lane assists employees with a robust and inclusive ADA accommodation, and is known by employees to be accessible

Lane Community College, in totality, Lane did not meet the 7% aspirational goal for FY 2016.

- **1.30% incumbency count vs aspirational goal of 7.00%** Documentation attached

Disabilities	Plan Year 2018
Hired FY 2016	No data
Applied FY 2016	3157 applicants No new hire disclosures
College Total Disabled	18 incumbents / 1395 employees = 1.29 %
<i>Less than 80% whole person rule: 20 job groups with placement goals</i>	

Plan Year 2017 data is insignificant for disabilities:

Hired FY 2016	No data
Applied FY 2016	3157 applicants / No new hire disclosures

Lane should focus immediately on disability information gathering processes in an attempt to document the numbers of disabled applicants hired.

c. Future Assessment of External Outreach and Recruitment Efforts [41 CFR60-300.44(f)(3)]

Lane will begin preliminary assessment of its outreach and recruitment efforts annually starting in 2018 and will document such assessment for inclusion in Lane's AAP. This will include an assessment of the effectiveness of each individual effort, as an assessment of the effectiveness of the totality of our efforts for the year. Lane began collecting data intermittently in 2015. We could not perform valid and reliable assessment of the effectiveness of our outreach and recruitment efforts at this time due to lack of quality and statistically invalid data. Starting in PY 2016, Lane established a process which allowed the collection of more complete data from which to perform a comprehensive assessment of whether our efforts are effective in recruiting protected veterans into our workforce is meeting compliance needs and Lane's goals for employing veterans. Lane now documents all of its outreach and recruitment efforts and maintains these documents, including the written assessments of the effectiveness of these efforts, for three years, in accordance with 41 CFR 60-300.44(f)(4).

d. Future Outreach and Positive Recruitment Activities

Lane plans to expand its outreach and positive recruitment efforts in FY 2018. Goals include ensuring routine posts of vacancy announcements to veteran job boards hosted by the Departments of Veterans Affairs and Defense (the Veterans Employment Center), the Paralyzed Veterans of America (Paving Access to Veterans' Employment), and other similar public and private veteran-focused job banks. Lane will also look in PY 2018 – PY 2019 to DOL Disabled Veterans' Outreach Program Specialists (DVOPS) & continue seeking Local Veterans' Employment Representatives (LVERs) in our area to explore the creation of an on-the-job training and mentorship program or related for protected veterans. Lane will also begin hosting briefing sessions and facility tours for representatives of local organizations that provide employment services to protected veterans.

- On January 18, 2018, the U.S. Department of Labor announced the launch of the HIRE Vets Medallion Program Demonstration — an effort that will recognize up to 300 employers for their investments in recruiting, employing, and retaining our nation's veterans. Each year a contractor may apply to be a Medallion institution. This is a longer term outreach (1 – 2 year program development) that Lane should participate in as quickly as possible. To do this easily, Lane would need to have a robust Metric software program that ties directly to diversity work and generates evidence of outcome.

VIII. Internal Dissemination of Policy [41 CFR60-300.44(g)]

Lane's Veteran Policy is part of the larger EEO policy. Lane will be working in FY 2018 to design and foster understanding, acceptance and support among all employees to encourage them to help Lane meet this obligation. The below actions are needed for compliance to the Internal Dissemination policy.

In order to be compliant, Lane must take the following actions in FY 2018.

- a. Ensure currency and proper placement of EEO/Compliance posters throughout the college.
- b. Policies are emailed to all employees annually and discussed in employee orientation programs.
- c. Ensure notices of affirmative action policy are posted as required; electronic policies are noticeable and readily accessible to applicants and employees, and included in the job application system.
- d. Managers and supervisors must be provided with Affirmative Action Training upon taking their roles.
- e. Notify Union officials and employee representatives of policies and send reminders on an annual basis.
- f. Update orientation, training and related materials and ensure currency
- g. Ensure all advertisements have the required Affirmative Action statement
- h. Begin a semi-annual or quarterly assessment and report documenting Lane's efforts to comply with its EEO/AAP responsibilities.
- i. May train managers and request reporting of any current or foreseeable EEO problem areas to the Chief Human Resources Officer.
- j. Track and document external job offers and hires, promotions, resignations, terminations, and layoffs relating to protected veterans.

VII. 41 CFR 60-300.44

The Chief Human Resource Officer (CHRO) and the Lead EEO/AA Recruitment Analyst have the responsibility for developing and preparing the formal documents of the AAP. The CHRO is responsible for the effective implementation of the AAP; however, responsibility is likewise vested with each executive, dean, director and manager to support the successful implementation.

FY 2018 is Lane's first official audit of Veteran personnel activities. Lane ensures such activities are free from discrimination against, or stereotyping of, protected veterans in any manner. The results of Lane's most recent self-audit are included in Part XI. A. During the self-audit, the following activities are reviewed:

- a. Recruitment, advertising, and job application procedures;
- b. Job assignments, job classifications, job descriptions, and seniority lists;
- c. Continue implementation of reasonable accommodation policies and procedures;
- d. Awarding of sick leave, leaves or absence, or implementation of any other leave policies;
- e. An applicant flow log showing the name, race, ethnicity, sex, protected veteran status, date of application, job title, interview status and the action taken for all individuals applying for job opportunities *[withheld from distribution or public inspection to ensure confidentiality]*.

To be compliant Lane must conduct the following audits of structures and systems for accessibility, inclusion and equity of Veterans, Minorities and Disabilities.

- This is in direct alignment with college program review work, college core themes, and with the four year implementation plan of Lane's Equity Lens plan in 2018.
- a. Provide periodic reports to college president and AAP Administrator documenting efforts to comply with EEO/AAP responsibilities, discussing any problem areas, recommend remedial actions and provide an update on meeting FY 2018 goals and objectives as stated in this narrative as well as the Minority/Gender narrative and the Disability narrative.
- b. Rates of pay and any other forms of compensation including benefits;
- c. Implementation of hiring, promotion, upgrading, award of tenure, layoff, and recall from layoff practices;
- d. Participation in training, mentoring, or apprenticeship programs, and attendance at professional meetings and conferences;
- e. Managers and supervisors report any current or foreseeable EEO problem areas to the CHRO and are asked to outline their suggestions or recommendations for solutions.
- f. Expand Audit and Reporting system in the measurement of both department and college-wide outcomes.
- g. Application of any other term, condition, or privilege of employment, including participation in company-sponsored educational, training, recreational, and social activities.
- h. Responsibility for Implementation of AAP [41 CFR60-300.44(i)]
- i. The Chief Human Resource Officer of the college is the responsible administrator for implementation compliance and has provided leadership for AAP completion. The success of plan year 2018 goals will be contingent upon coordination of all implementation tasks.
- j. The development of the AAP for protected veterans, policy statements, personnel policies and procedures, internal and external communication of the policy, and monitoring the effectiveness of these actions;
- k. Improve monitoring the effectiveness of the program on a continuing basis through the development and implementation of an internal audit and reporting system that measures the effectiveness of the program;
- l. Begin encouraging AAP support from managers and executives by keeping the CHRO informed of equal opportunity progress and problems within the company through quarterly reports;
- m. Providing managers with copies of the Affirmative Action Program (minus the items withheld from dissemination for confidentiality reasons) and reviewing the program with them on an annual basis to ensure knowledge of their responsibilities for implementation of the program;
- n. Begin reviewing the company's AAP for protected veterans with all managers and supervisors at all levels to ensure that the policy is understood and is followed in all personnel activities;
- o. Assist in ensuring that career development of employees who are protected veterans is equal to that of other employees;
- p. Follow up on the compliance advisement given in 2016 to ensure currency and compliance by auditing the contents of company bulletin boards to ensure that required information is posted and up-to-date; for all affirmative action and EEO areas.
- q. Ensure training and designation of a liaison between Lane and enforcement agencies;
- r. Maintain AA/EEO analyst work of serving as a liaison between Lane and outreach and recruitment sources for protected veterans and those with disabilities.
- s. Reviewing the qualifications of all applicants and employees considered/eligible for hiring promotion, transfer, or layoff/reduction in force to ensure protected veterans and those with disabilities are receiving same access and equity.

VEVRAA AAP Component	Audit Requirements [41 CFR60-300.44(h)]	Date last inspected for compliance and Results of Inspection (Compliant (C)/Not Compliant (NC))	Follow-on or remedial actions
Invitation to self-identify at the pre-offer stage (41 CFR60-300.42(a))	As of January 2014 Lane invites applicants to self-identify as a protected veteran pre-offer using a form that conforms to OCP requirements at 41 CFR 60- 300.42(a) and (c)).	NC	
Invitation to self-identify at the post-offer stage (41 CFR 60-300.42(b))	LANE invites applicants to self-identify as a protected veteran post- offer using a form that conforms to OCP requirements at 41 CFR 60-300.42(b) and (c)).	October 15 2017; (C)	Upon inspection in October 2016, it was found that the VEVRAA form was not attached to 2 of the new application types. Resolved, November 2017
Policy Statement (41 CFR 60- 300.44(a))	Policy Statement posted on bulletin boards.	March 2015	Policy and poster placements are not readily accessible and in all buildings where employees work.
	Policy Statement made available, as needed, in a form that is accessible and understandable to disabled veterans.	April 2017	Need to inform about local accessibility to policy
	Policy Statement contains required non-discrimination and non- retaliation statements.	January 2016; (C)	Compliant,
	Policy Statement indicates top executive support for AAP.	NC	No executive support has been provided for action plans or Affirmative Action Implementation beyond the CHRO since 2006.
Review of Personnel Processes (41 CFR 60-300.44(b))	LANE conducts periodic review of personnel processes using procedures designed to facilitate this review.	NC	Take action in PY 2018, establish baseline procedures
Physical and Mental Qualifications (41 CFR 60-300.44(c))	LANE provides and adheres to a schedule for reviewing all physical and mental qualification standards in the AAP.	NC	Take action in PY 2018
	LANE will demonstrates that, if a physical/mental qualification standard tends to screen out qualified disabled veterans, the standards are job-related and consistent with business necessity.	NC	Take action in PY 2018
Outreach	Conduct and annual assessment of each outreach and recruitment activity, and an assessment of the totality of these activities that meets requirements	October 2017	Schedule and Conduct annual outreach assessments

VEVRAA AAP Component	Requirements	Date last inspected for compliance and Results of Inspection (Compliant (C)/Not Compliant (NC))—	Follow-on or remedial actions
Reasonable Accommodation (41 CFR 60-300.44(d))	LANE provides reasonable accommodation to the known physical and mental limitations of otherwise qualified disabled veterans absent undue hardship	NC (no dates known)	Individual ADA accommodation follow is done consistently. Need to conduct an annual or semi-annual review for access, equity and inclusion
Reasonable Accommodation (41 CFR 60-300.44(d))	If employees who are known disabled veterans experience performance difficulties that may be related to the disability, Lane confidentially informs the employee of the issue, asks if it is related to the disability and, if so, ask if the employee needs an accommodation.	NC (no dates known)	Lane is aware that managers with supervisory responsibilities over employees with known disabilities are most likely unaware of this affirmative duty. Lane should strive to provide a comprehensive training to all executives, managers and interested employees; with follow up training sessions. It is required that all new managers be trained in AA.
Harassment (41 CFR 60-300.44(e))	LANE has developed and implemented procedures to ensure employees are not harassed on the basis of protected veteran status and provided those procedures in the AAP.	October 2016; (C)	Complete this on an annual basis
External dissemination of policy, outreach, and positive recruitment (41 CFR 60-300.44(f))	LANE undertakes appropriate outreach and positive recruitment activities that are reasonably designed to effectively recruit qualified protected veterans.	On-going (C)	Continue to focus efforts on disabled veterans
	Lane will document outreach and recruitment activities and will retain such documents for a period of three years.	Pending implementation	Stronger tracking will be developed that the current system used to foster annual and semi-annual reviews.
	LANE conducts an assessment of each outreach and recruitment activity, and an assessment of the effectiveness of the totality of these activities that meets these requirements:	Pending implementation	This plan is the first formal assessment of outreach activities.

VEVRAA AAP Component	Requirements	Date last inspected for compliance and Results of Inspection (Compliant (C)/Not Compliant (NC))	Follow-on or remedial actions
External dissemination of policy, outreach, and positive recruitment (41 CFR 60-300.44(f))	1. LANE conducts an overall assessment annually;	NC	Track and create regular annual reviews
	LANE documents criteria it uses in its assessment, which includes data collected pursuant to 41 CFR 60-300.44(k) for current year and the two most recent previous years;	C	As required
	LANE evaluates <u>each</u> outreach and recruitment activity using the criteria set out and comes to a reasonable conclusion as to whether each activity is effective in identifying and recruiting protected veterans	C	Implemented in PY 2016, need one more year of data
	LANE provides an assessment of its overall outreach and recruitment efforts and, if it concludes that these overall efforts are not effective, LANE identifies and implements alternative efforts; and	C	Implemented in PY 2016, need one more year of data
	LANE documents these assessments and retains such documents for 3 years.	In- process	Finalize implementation
Internal Dissemination of Policy (41 CFR 60-300.44(g))	LANE includes its affirmative action policy in the policy manual or make it otherwise available to employees.	October 2017; (C)	Online availability, or contact HR
	LANE notifies union officials of its affirmative action policy.	NC	Implement in 2018
Audit and Reporting System (41 CFR 60-300.44(h))	LANE has designed and implemented an audit and reporting system that: (a) measures the effectiveness of AAP, (b) indicates any need for remedial action, (c) determines whether affirmative action objectives have been reached, (d) determines whether known protected veterans have had the opportunity to participate in all company sponsored educational, training, recreational and social activities, (e) and measures compliance with the AAP's specific objectives.	Partially Compliant	Create a method to measure effectiveness of action plan; develop a method to track and document activities and access for veterans.
	Lane documents the actions it takes to comply with audit and reporting system obligations and retains these documents as employment records.	Pending implementation	Conduct a Needs Analysis to determine how to correct the many years of non-compliance with stated objectives; and to
	LANE undertake necessary action to bring AAP into compliance if it finds any deficiencies.	NC	Lane has not addressed compliance issues brought forth

Responsibility for Implementation (41 CFR 60-300.44(i))	Lane assigns an official the responsibility for implementation of its AAP activities whose identify appears on all internal and external communications regarding the AAP and is supported by senior management and staff to implement the AAP.	NC	Official responsibility is assigned but is not carried out. Develop support structure and train on AA responsibilities.
Training (41 CFR 60-300.44(j))	Lane trains all personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes to ensure the commitments in the AAP are carried out.	Last training date for college is unknown – NC On-going since 2006 - Recruitment team is trained by the AA analyst.	Conduct Needs Assessment Survey. Provide formal training for AA data analyst. Make required manager trainings mandatory, ensure compensation. Create tracking process for training.
Data Collection Analysis (41 CFR 60-300.44(k))	Lane documents the following computations or comparisons pertaining to applicants and hires on an <u>annual basis</u> and maintains them for a period of three years: <ul style="list-style-type: none"> • <i>The number of applicants who self-identified as protected veterans at the pre-offer stage of employment process;</i> • <i>The total number of job openings;</i> • <i>Total number of jobs filled;</i> • <i>The total number of applicants for all jobs;</i> • <i>The number of protected veteran applicants hired;</i> • <i>The total number of applicants hired.</i> 	Pending implementation	Lane has not fully implemented an annual document showing computations and comparisons for new hires. This is done on a per search basis. Lane Employment Online data base is able to generate all reports on an as-needed basis. A formalized process is in development.
Hiring Benchmarks (41 CFR 60-300.45)	Lane Community College uses the OCP annual aspirational benchmark for protected veterans	October 2015	This process is formalized as of 2016

IX. EEO and Affirmative Action Training [41 CFR60-300.44(j)]

Managers, supervisors, and human resources staff involved in recruiting, screening, selection, promotion, disciplinary, and other related employment processes should participate in regular training to remain current with AAP guidelines.

During training sessions, managers and supervisors are advised of their responsibilities under Lane's AAP for protected veterans and of their obligations to:

- a. Assist in the identification of problem areas, formulate solutions, and establish departmental goals and objectives;
- b. Ensure qualified applicants and employees who are protected veterans are treated in a nondiscriminatory manner in all employment practices, including when making selection decisions, such as for hire, promotion, training, or to receive awards or bonuses;
- c. Provide reasonable accommodation to the known physical or mental limitations of qualified disabled veterans unless such accommodation would impose an undue hardship on the conduct of its business;
- d. Maintain confidentiality of any information regarding self-identification of protected veteran status; and
- e. Ensure that nondiscrimination is adhered to in all personnel activities.
- f. Ensure comprehensive training on AAP/EEO laws and regulations, metric and statistical analysis and related work for necessary personnel.

X. Applicant and Hiring Data [41 CFR60-300.44(k)]

Lane Community College collects employee data pertaining to protected veterans in order to assess the effectiveness of the college's outreach and recruitment efforts, Lane invites applicants to voluntarily inform the college whether they believe they are protected Veterans or not. In order to demonstrate progress toward goals, the incumbency vs availability reports are included below.

- a. As the hiring data for PY 2015 and PY 2016 was not complete it is difficult to measure the complete impact of Lane's work in PY 2017 and PY 2018.

a. In order to be compliant, Lane must take the following actions in FY 2018.

- a. Offer a post-hire review to every new budgeted hire. Data collected for AA Plan use must be maintained confidentially.
- b. Develop a veteran tracking system for part-time recruitments and train those who need to be involved concerning new hire paperwork on the legal necessities regarding demographics.
- c. Offer all employees three annual surveys for Minorities, Gender, Veterans and Disabilities. Lane will implement this work during the remainder of 2018 and during 2018/2019. After the third year of benchmark data then survey the employee population every 3 years.
- d. Establish a method in New Hire Orientations to confidentially collect demographics from newly hired employees in budgeted positions, and assure confidentiality for those who self-identify as protected Veterans.

XI. Hiring Benchmarks [41 CFR60-300.45]

Regulations require that contractors establish annual hiring benchmarks for protected veterans. Lane must use one of two methods to establish benchmarks. Lane may choose to establish a benchmark equal to the national percentage of veterans in the civilian workforce, which is published in the Benchmark Database, which is updated annually by the OCP. Alternatively, Lane may establish their own benchmarks using data from a variety of authorized sources.

- g. Lane use the annual federal benchmark of 7%.
- h. The Veteran Incumbency table below represents job groups benchmark data. Wherever there is a “YES” Lane has a goal that requires good faith efforts to advertise, recruit, outreach as well as monitor promote and transfer of veteran employees.
- i. Data collection: The regulations require that contractors document and update annually several quantitative comparisons for the number of veterans who apply for jobs and the number of veterans they hire. Having this data assists contractors in measuring the effectiveness of their outreach and recruitment efforts. The data must be maintained for three years to be used to spot trends.
 - o This data is held confidentially in the applicant reporting data base and affirmative action reports

Limitations to data and opportunities for improvement:

- Part-time employee data collection, post-hire, is very limited due to decentralized hiring of part-time employees and the need for training and education.
- Voluntary Veteran data collection is effected when legally required documentation is not provided which would allow assessment of preferencepoints
- Assess preference points, and may effect applicants place in the interview pool

Results of work in PY 2017 - Veteran Job Group Counts

Employee Class	Total # job groups in class
Faculty	FTE: 5 PT: 5
Management	FTE: 3 PT: 0
Classified	FTE: 9 PT: 10
Entered Plan Year 2018: 55 Employee Veterans	

Appendix

Attached is a combined report for disabilities and veteran benchmark data at Lane. The 80% placement goal reflects the reporting standard for females, minorities and disabilities. Wherever the benchmark goal of 7.00% is stated, indicates good faith action must be taken. This would include following any action item step needed to be compliant as stated during FY 2018. These requirements may mean that efforts need to be directed toward outreach, diversity advertising and training.

Job groups which show a trend of consistently not meeting placements goals will require good faith efforts in advertising and retention. These reports are a beginning assessment tool for diversity inclusion and Lane's recruitment effectiveness.

The minority female placement goal report has been included for reference and to provide information on job groups where multiple protected classes are not represented at 80%.

Goals - Benchmarks (Disability - Veteran)

Lane AAP_Plan Year_2018
10/15/2017

Job Group	Goals - Benchmarks (%)	
	Disability	Veteran
10 Senior Executives	-	-
11 Non-Instructional Managers	7.00	-
12 Instructional Managers	-	-
13 Arts & Letter Faculty	7.00	-
14 Science & Math Faculty	7.00	-
15 Trade & Tech Skills Faculty	7.00	-
16 Basic Skills Faculty	7.00	7.00
17 Health & Athletic Faculty	7.00	7.00
19 Prof HR, Fin, Coord; all	7.00	7.00
21 Para-prof;Technology &/or Adm	-	-
23 Computer Program/Network/Help	7.00	-
24 Student Srv & Instruct Support	7.00	7.00
25 Administrative Support	7.00	7.00
26 Craft (skilled)	7.00	-
27 Operatives (semi-skilled)	-	-
28 Service Worker	7.00	-
29 Laborers (unskilled)	-	-

Comparison of Incumbency to Goal-Benchmark is performed using the 80% with Whole Person Rule

Goals - Benchmarks (Disability - Veteran)

Lane AAP_Plan Year_2018
10/15/2017

Job Group	Goals - Benchmarks (%)	
	Disability	Veteran
PT13 PT Arts & Letter Faculty	7.00	7.00
PT14 PT Science & Math Faculty	7.00	7.00
PT15 PT Trade & Tech Faculty	7.00	-
PT16 PT Basic Skills Faculty	7.00	7.00
PT17 PT Health & Athletics Faculty	7.00	7.00
PT19 PT Prof HR, Fin, Coord; all	-	-
PT21 PT Para-prof;Tech &/or Admin	-	-
PT23 PT Computer Program/Network/He	-	-
PT24 PT Student Srv & Instr Support	7.00	7.00
PT25 PT Administrative Support	7.00	7.00
PT26 PT Craft worker (skilled)	-	-
PT27 PT Operative (semi-skilled)	-	-
PT28 PT Service Worker	7.00	7.00
PT29 PT Laborer (unskilled)	-	-
Facility Total	7.00	7.00

Comparison of Incumbency to Goal-Benchmark is performed using the 80% with Whole Person Rule

Incumbency v. Estimated Availability_ Plan Year 2018

Lane AAP_Plan Year_2018 10/15/2017

Comparison Rule

80% with Whole Person Rule

Incumbency v. Estimated Availability_ Plan Year 2018

Lane AAP_Plan Year_2018

10/15/2017

Job Group	Less than 80% ?	
	Female	Minority
10 Senior Executives		Yes
11 Non-Instructional Managers		Yes
12 Instructional Managers	Yes	
13 Arts & Letter Faculty		
14 Science & Math Faculty		Yes
15 Trade & Tech Skills Faculty	Yes	Yes
16 Basic Skills Faculty		Yes
17 Health & Athletic Faculty		Yes
19 Prof HR, Fin, Coord; all		
21 Para-prof;Technology &/or Adm		Yes
23 Computer Program/Network/Help	Yes	Yes
24 Student Srv & Instruct Support		Yes
25 Administrative Support		Yes
26 Craft (skilled)	Yes	Yes
27 Operatives (semi-skilled)		
28 Service Worker		
29 Laborers (unskilled)	Yes	

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 - 10/15/2016-10/15/2017_Plan Year 2018

Incumbency v. Estimated Availability_ Plan Year 2018

Lane AAP_Plan Year_2018
10/15/2017

Job Group	Less than 80% ?	
	Female	Minority
PT13 PT Arts & Letter Faculty	Yes	
PT14 PT Science & Math Faculty		Yes
PT15 PT Trade & Tech Faculty	Yes	Yes
PT16 PT Basic Skills Faculty		Yes
PT17 PT Health & Athletics Faculty		Yes
PT19 PT Prof HR, Fin, Coord; all		
PT21 PT Para-prof;Tech &/or Admin		Yes
PT23 PT Computer Program/Network/He		
PT24 PT Student Srv & Instr Support		Yes
PT25 PT Administrative Support		
PT26 PT Craft worker (skilled)		
PT27 PT Operative (semi-skilled)	Yes	
PT28 PT Service Worker		
PT29 PT Laborer (unskilled)		

Comparison of Incumbency to Availability is performed using the 80% with Whole Person Rule
Yes indicates 80% Ratio < 80.0 and Difference <= -1.0