

LANE COMMUNITY COLLEGE EXECUTIVE ORDER 11246
AFFIRMATIVE ACTION PROGRAM

Plan year 2018

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

Referred to: Dr. Margaret Hamilton, President
Dr. Mary Spilde, Former 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

CONFIDENTIAL TRADE SECRET MATERIALS

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

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 2018

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 2018 plan year, Lane's narrative has been updated by Chief Human Resource Officer Dennis Carr and LynnMarie Chowdhury, AA/EEO Analyst.

Affirmative Action Requirements and Analysis

60-2.11 Workforce Analysis / Organizational Display

Represents the determination of whether or not 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.

Employee Group	Plan Year 2016 Employee Count	Plan Year 2017 Employee Count	Plan Year 2018 Employee Count
Faculty (PT & FT)	534 (60 minorities)	507 (56 Minorities)	482 (52 Minorities)
Non-Faculty:	417 (54 Minorities)	406 (53 Minorities)	405 (46 Minorities)
Hourly Classified:	699 (117 Minorities)	490 (106 minorities)	453 (79 minorities)
Total Employees	1650 (240) 14.00%	1403 (215) 15.4%	1340 (177) 13.21%

Distribution of Minorities:

The workforce analysis reveals that Lane will need to provide training, transfer and promotion assistance to minorities. This will be incorporated into the action plan.

60-2.11 Workforce Analysis

Employee movement impacting Workforce Analysis Data

- Lane has offered a severance package to both Full-time Classified and Full-time Faculty job groups during the past three years. This circumstances have created unforeseen and unpredictable vacancies and have also caused some unplanned movement of females and minorities among the job groups.
- Lane closed two instructional departments in 2016, Auto-body and Electronic Technology programs, and the Counseling division was reorganized.
- During Plan Year 2017 the college initiated a substantial reorganization for Student Services.
 - Some employees were re-located to new departments
 - Some employees were given new duties.
 - Multiple departments changed titles and some services to students were re-distributed.
- It is always recommended by EEOC that contractors assess adverse impact for all lay-off, severance and organizational changes on minorities and females before a reorganization or lay-off process begins. The voluntary severance opportunities noted in the first bullet were negotiated with the unions. The program reduction and program elimination impacts noted in the second bullet were the result of budget balancing proposals and all personnel impacts were implemented consistent with the layoff and seniority provisions of the respective collective bargaining agreements.
- **Minorities are disproportionately distributed across the college.**
 - The data indicates a possible ceiling for minorities in some job groups.
 - For binary gender groups, females are the larger population.
 - Some minority employees are in the lowest paid positions at the college, primarily in custodial services, and part-time positions.

60-2.12 Job Group Analysis

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

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

1) 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.)

2) 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

3) 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:

Summary of Goal Attainment Analysis:

1) Faculty Goals using 2017 SEDS data :

Faculty Job Group	2016 Goal Percent %	Did we meet PY 2017 Goals?
13 Arts & Letters Faculty	None	No Goal
14 Science & Math Faculty	16.00 (minority goal)	Yes, met minority goal
15 Trade and Tech Skills	19.86 (minority)	Minority/Female Goals not attained
16 Basic Skills Faculty	11.68 (minority)	Minority goal has increased
17 Health & Athletic Faculty	15.41 (minority)	Minority goal has increased

- **Met one (1) goal.**

2) Management and Classified job groups goals using 2010 US Census Data

Management Job Group	2017 Goal Percent %	Did we meet PY 2017 Goals?
10 Senior Executives	18.20 (minority goal)	Minority Goal not attained
11 Non-Instructional Mgrs	19.51 (minority goal)	Minority Goal not attained
12 Instructional Mgrs	59.32 (female goal)	Minority Goal not attained

- **No Goals Attained**

Classified Job Group	2016 Goal Percent %	Did we meet PY 2017 Goals?
19 Professional Coordinators	15.34 (minority goal)	Minority Goal attained
21 Para-Prof, Tech-Admin	17.04 (minority goal)	Minority Goal not attained
23 Computer prof. complex	30.24 (female) 17.84	Minority Goal not attained
24 Student Srv Instruct	14.41 (minority goal)	<i>No Goals</i>
25 Administrative Support	15.78 (minority goal)	Minority Goal not attained
26 Craft	15.51 (female) 16.29	Minority Goal not attained
27 Operatives	Job group size insignificant	<i>Job group size insignificant</i>
28 Service Worker	No goal	<i>No Goals</i>

- **Met one (1) goal.**

Summary of Goal Attainment:

- **Lane has made limited progress during 2017 in meeting placement goals for all job groups overall; the number of placement goals remains the same from 2016 to 2017.**
- **Two Job Groups have met goals.**
 - Job Group 19 met its goal through the realignment of job titles to this group last year, rather than new employment
 - Job Group 13 met its goal solely due to the Dean of Social Science's approach to inclusiveness in minority recruitment.

- Management job groups have increased in terms of needing to strive for better protected class outcomes in management job groups. This indicates that management within these departments and recruitment outreach efforts to the external applicant pools to attract protected class candidates should be a focus as a directed goal for management job groups to comply with best practices from the OFFCP.

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.

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.

a) 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.

b) Other job group realignments

- 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

Lane AAP_Plan Year 2017

10/15/2016

Job	Less than 80% ?	
	Femal	Minori
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
18 Non-Instructional Faculty		
19 Prof HR, Fin, Coord; all		Yes
21 Para-prof;Technology &/or Adm		
23 Computer Program/Network/Help	Yes	Yes
24 Student Srv & Instruct Support		
25 Administrative Support		Yes
26 Craft (skilled)	Yes	Yes
27 Operatives (semi-skilled)		
28 Service Worker		

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

Job	Less than 80% ?	
	Female	Minority
29 Laborers (unskilled)	Yes	
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		
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 <= -1.080%*

41 CFR 60-2.17(c) The 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 are 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.

III. (41 CFR 60-2.17(d)) Internal Audit and Reporting Systems

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 the college's management team 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 2016-2017 narrative for the 2018 AA Plan 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; andIdentifies 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.

41 CFR 60-2.17(a) The Responsibilities of the Lane Community College's Management team to Ensure Implementation of the Action Plan for plan year 2017.

President - Mary Spilde, with Margaret Hamilton becoming President on July 1, 2018

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) – Currently vacant

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 policies, goals, and timetables within the Human Resources Department (www.lanec.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.