

AFFIRMATIVE ACTION PLAN

for

BLACK HAWK COLLEGE

Plan Year: July 1, 2016 – June 30, 2017

AA/EEO Officer:

Stacey Cary

Director of Human Resources

Location of Facility:

6600 34th Avenue

Moline, IL 61265

309-796-5000

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I. INTRODUCTION AND FACT SHEET

Black Hawk College (hereinafter referred to as “College”) is committed to the concept and practice of equal opportunity and affirmative action in all aspects of employment and education. This Affirmative Action Plan is designed to satisfy the College’s Equal Employment Opportunity/Affirmative Action responsibilities under Executive Order 11246, as amended, Title VII of the Civil Rights Act of 1964, Section 503 of the Rehabilitation Act of 1973, Section 4212 of the Vietnam Veterans Readjustment Assistance Act of 1974, the Illinois Human Rights Act of 1980, and the various implementing rules and regulations.

In developing and implementing this plan, the College has undertaken an analysis of its policies and practices with a view toward enhancing equal employment opportunity without regard to sex, race, national origin, religion, color, sexual orientation, marital status, age, disability, or special disabled veteran, Vietnam era or other covered veteran status. This plan is adopted in reliance on the Equal Employment Opportunity Commission’s Affirmative Action Guidelines as well as those of the Office of Federal Contract and Compliance Programs. This Affirmative Action Plan does not create any rights for any person or entity and is not developed nor intended to be used as a vehicle to sanction the unlawful discriminatory treatment of any group or individual.

Name and addresses of facility and satellite locations:

Black Hawk College
Quad Cities Campus
6600 - 34th Avenue
Moline, IL 61265

BHC Community Education Center
404 E. Third Street
Kewanee, IL 61443

Black Hawk College
East Campus
26230 Black Hawk Road
Galva, Illinois 61434-9476

BHC Outreach Center
301 Avenue of the Cities
East Moline, IL 61244

BHC Adult Learning Center
4610 Blackhawk Commons Drive
Rock Island, IL 61201

Nature of Business: Community College
AA/EEO Officer: Stacey Cary, Director of Human Resources

A. Confidentiality Statement

The Affirmative Action Plan contains confidential information which is subject to the provisions of 18 U.S.C., Section 1905, Chrysler Corporation v. Brown, 441 U.S. 281, 99 S. Ct. 1705 (1979). Copies of this plan and all related appendices, documents and supporting data are made available on loan to the United States Government upon the request of the Government on the condition that the Government hold them completely confidential and not release copies to any persons whatsoever.

The plan and its appendices and other supporting documents contain confidential information that may reveal directly or indirectly the College's plans for business and geographical expansion and contraction. The College considers this plan to be exempt from disclosure, reproduction and distribution under the Freedom of Information Act upon the grounds, among others, that such material constitutes:

1. Personnel files, the disclosure of which would constitute a clearly unwarranted invasion of personal privacy, and are exempt from disclosure under 5 U.S.C., Section 552(b)(6);
2. Confidential, commercial or financial information which is exempt from disclosure under 5 U.S.C., Section 552(b);
3. Investigatory record compiled for law enforcement purposes, the production of which would constitute an unwarranted invasion of personal privacy, which are exempt from disclosure under 5 U.S.C., Section 552(b)(7)(C); and
4. Matters specifically exempted from disclosure by statute, which are exempt from disclosure under 5 U.S.C., Section 552(b)3.

Furthermore, release of any trade secret, confidential statistical or commercial information would be arbitrary and capricious in violation of the Administrative Procedures Act. See, e.g., CAN Financial Corp v. Donovan, 830 F.2d 1132, 1144 and n. 74 (D.C. Circ) cert. denied, 485 U.S. 977 (1988).

NOTICE IS HEREBY GIVEN OF REQUEST PURSUANT TO 41 C.F.R., SECTION 60-60.4(D) THAT THIS PLAN BE KEPT CONFIDENTIAL.

As such, the College makes it clear that it does not consent to the release of any information contained in this plan under the Freedom of Information Act or otherwise. If the United States Government, or any agency or subdivision thereof, is considering a request for release of this plan under the Freedom of Information Act, **a request is hereby made that the Government immediately notify the President or AA/EEO Officer of this College of any and all Freedom of Information Act requests received by the Government or any contemplated release of this plan by the Government which related to information obtained by the Government from this College.**

The College further requests that anyone who review this plan, its supporting appendices, documents or other data, treats such information as confidential and that such information not be released to any person. Retention or disclosure of information relating to identifiable individuals may also violate the Privacy Act of 1974.

II. Affirmative Action/Equal Employment Opportunity Policy Statement

Black Hawk College has adopted Board Policy Section 5.70 as a statement of its commitment to Equal Opportunity and Affirmative Action which states, in part:

“The College will make all educational and personnel decisions without regard to race, color, religion, sex, sexual orientation, marital status, national origin or ancestry, age, physical or mental handicap unrelated to ability, unfavorable discharge from military service or status as a disabled veteran or Vietnam era veteran....”

To this end, the College supports and will cooperate fully with all applicable laws, regulations, and executive orders in all of its employment policies, practices and decisions. The College will take affirmative action to assure equal opportunity for employment is provided with regard to all personnel actions, including but not limited to:

All recruiting and hiring programs in all job categories;

Decisions regarding employment; and

All personnel actions such as compensation, benefits, transfers, training, social and recreational programs, job opportunities, layoffs, recalls, education and other terms and conditions of employment.

The College firmly believes that equal employment opportunity can only be achieved through demonstrated leadership and implementation of a viable affirmative action plan. This Plan sets forth specific affirmative action and equal employment opportunity responsibilities for managers, supervisors and all employees. All employees are expected to comply with the policy and the Affirmative Action Plan. All employees are expected to demonstrate respect for all other employees. It is imperative that all employees make personnel and employment decisions in accordance with the College’s policies, practices, and procedures.

Stacey Cary serves as the College’s Affirmative Action/Equal Employment Opportunity Officer and has responsibility for assuring compliance with the Plan. Please communicate any questions or concerns that you have to her. A copy of the Plan is available for inspection upon a reasonable request to Ms. Cary during normal business hours from 8:00 A.M. to 5:00 P.M., Monday through Friday, except holidays at 6600 34th Avenue, Moline, IL 61265.



Dr. Bettie A. Truitt
President

October 31, 2016

III. DISSEMINATION OF THE AFFIRMATIVE ACTION STATEMENT

A. Internal

1. The Affirmative Action statement is permanently posted on major bulletin boards where it can be viewed by employees and applicants.
2. Periodically, the Affirmative Action Plan is communicated to executive, managerial and supervisory personnel along with instruction on the laws and regulations concerning equal employment opportunity and affirmative action.
3. New employees are informed of the Plan as part of the College's orientation program.
4. Hiring committees are trained in conducting a fair and legal hiring process.
5. The Equal Employment Opportunity Poster is permanently and prominently displayed.
6. If and when employees are featured in product or consumer advertising, handbooks or similar publications, an effort is made to include women and men and people of diverse race and ethnicity.

B. External

1. Job postings and recruitment communications will contain a statement of the College's status as an Affirmative Action/Equal Employment Opportunity employer.
2. Through job postings, prospective employees are made aware that the College is an Equal Employment Opportunity employer.
3. When employees are pictured in consumer advertising, help-wanted advertising or College publications, reasonable steps will be taken to include women and men and people of diverse race and ethnicity.
4. All help-wanted advertising contains a designation that the College is an Equal Opportunity Employer.
5. The College's online employment application process notes its commitment to equal opportunity principles.
6. The College's Nondiscrimination and Affirmative Action clause will be incorporated in all purchase orders and contracts covered by Executive Order 11246.

7. Written notification of the College's non-discrimination policy will be sent to subcontractors, vendors and suppliers requesting appropriate action on their part.

IV. RESPONSIBILITIES FOR IMPLEMENTATION

A. AA/EEO Officer

The AA/EEO Officer has overall responsibility for implementation of this Affirmative Action Plan. He/She has been given top management support to execute this assignment and his/her responsibilities include, but are not limited to:

1. Developing policy statements, affirmative action plans and programs, monitoring the effectiveness of the Affirmative Action Plan, and implementing remedial action as needed.
2. Assisting in the identification of problem areas, and assisting management in arriving at solutions to problems.
3. Serving as the contact person for anyone who has an Equal Opportunity or Affirmative Action concern.
4. Ensure that employees receive information and ongoing training about the College's Harassment Policy.
5. Serving as liaison between the College and enforcement agencies.
6. Serving as liaison between the College and community organizations concerned with employment of protected class members.
7. Keeping management informed of the latest developments in equal opportunity and affirmative action areas.

B. Management Personnel

Management responsibilities include, but are not limited to:

1. Assisting the AA/EEO Officer in identifying problem areas and establishing goals and objectives to correct their problem areas.
2. Assisting the AA/EEO Officer, as appropriate, in being actively involved with community organizations concerned with employment of protected class members.

3. Periodically assisting the AA/EEO Officer in auditing training programs and hiring patterns to remove impediments to the attainment of goals and objectives.
4. Assisting the AA/EEO Officer in holding periodic discussions with appropriate managers, supervisors and employees to be certain Equal Opportunity/Affirmative Action policies are being followed.
5. Offer assistance with interviewing skills through the staff training department.
6. Offer career counseling for employees through the College's Career Center.
7. Periodically auditing facilities to ensure posters are properly displayed and physical facilities other than those requiring segregation to achieve personal privacy are desegregated.
8. Ensuring that supervisors understand that their job duties include cooperating in efforts to comply with the EEO laws and the Affirmative Action Plan.
9. Ensuring that supervisors take action to prevent harassment of employees including those placed through affirmative action efforts.
10. In coordination with others in management, to fully implement this plan.

C. Supervisory Personnel in Academic and Support Program Areas

Supervisor responsibilities include, but are not limited to:

1. Exemplify the principles of equal opportunity in daily activities, employment practices, educational programs and services to students and the community.
2. Foster a work environment free of harassment, intimidation and insults based on race, color, religion, gender, sexual orientation, marital status, national origin, ancestry, age, physical or mental disability, or status as a disabled veteran or Vietnam era veteran.
3. Consult the AA/EEO Officer on issues related to discrimination or harassment.
4. Report any potential discrimination or harassment concerns to the AA/EEO Office as soon as possible after becoming aware of them.

D. Faculty

Faculty responsibilities include, but are not limited to:

1. Exemplify the principles of equal opportunity in daily activities, employment practices, educational programs and services to students and the community.
2. Foster an educational environment free of harassment, intimidation and insults based on race, color, religion, gender, sexual orientation, marital status, national origin, ancestry, age, physical or mental disability, or status as a disabled veteran or Vietnam era veteran.
3. Report any potential discrimination or harassment concerns to the AA/EEO Office as soon as possible after becoming aware of them.
4. Learn about the challenges faced by learners with disabilities and take action to support students with disabilities in the classroom.

E. Staff

Staff responsibilities include, but are not limited to:

1. Exemplify the principles of equal opportunity in daily activities, employment practices, educational programs and services to students and the community.
2. Report any potential discrimination or harassment concerns to their supervisor or the AA/EEO Office as soon as possible after becoming aware of them.

V. Workforce/Availability Information

A. Job Groups

Job groups are composed of job titles with similar job content, advancement opportunities and compensation. There are no formal or informal lines of progression for movement within the various jobs, within the job groups or between job groups. Employees are encouraged to express interest in any open or available jobs and will be considered on a non-discriminatory basis.

B. Workforce

The College has analyzed the composition of its workforce. The analysis has been conducted by grouping employees by department, job title, race and sex. There are no formal or informal lines of progression for movement within the various departments, jobs and job groups. Employees are encouraged to express interest in any open or available jobs and will be considered on a non-discriminatory basis.

For the purpose of the Affirmative Action Plan workforce job groups consist of Adjunct Faculty, Full-time Faculty, Executive/Administration and Managerial, Other, Other Professional,

Service/Maintenance, Technical and Paraprofessional, Police, Clerical and Secretarial and Skilled Crafts. Employee data was pulled using the point-in-time October 2016.

C. Availability

“Availability” is defined as “the statistical estimate of the proportion and numbers of minorities and women available in the relevant job market who possess the training and skills necessary to qualify for employment.” The US Census Special EEO Data Tabulation File for 2010 was the availability source used for the utilization analysis. The relevant labor market used was the Quad City Metro Area and Henry County for all positions except Full-time Faculty where national data was used since recruitment is done nationally for Full-time Faculty.

D. Utilization Analysis

“Utilization Analysis” is a comparison of the employer’s workforce with published statistical data indicating the number of available minorities and women in the relevant labor market. The utilization analysis is located on page 10 of this document.

Black Hawk College

COMPARING INCUMBENCY TO AVAILABILITY:

Point in Time: October 2016

Using availability data from US Census 2010

Job Group	Total Employed	Total Minorities Employed		Minorities			Total Females Employed		Females		
		% workforce	% available	% workforce	Full Util.	Under Util.	% workforce	% Available	Full Util.	Under Util.	
Adjunct Faculty	158	12.66%	7.50	169%	NO	NO	65.82%	60	110%	NO	
Full Time Faculty	114	15.79%	26.70	59%	YES	NO	55.26%	57.4	96%	NO	
Executive/Admin and Managerial	28	10.71%	5.90	182%	NO	NO	64.29%	37.9	170%	NO	
Other	183	33.88%	10.50	323%	NO	NO	52.46%	40.5	130%	NO	
Other Professional	75	10.67%	8.00	133%	NO	NO	69.33%	58.5	119%	NO	
Service/Maintenance	52	32.69%	13.70	239%	NO	NO	26.92%	55.7	48%	YES	
Technical and Paraprofessional	36	8.33%	9.40	89%	NO	NO	80.56%	77.5	104%	NO	
Police	20	20.00%	8.20	244%	NO	NO	10.00%	32.4	31%	YES	
Clerical and Secretarial	45	15.56%	10.60	147%	NO	NO	97.78%	94	104%	NO	
Skilled Crafts	10	50.00%	4.70	1064%	NO	NO	0.00%	3.6	0%	YES	

Under-utilization is defined as having fewer minorities or women in a particular job group than would be reasonably expected by their availability in the relevant job market.

Availability indicates number of minorities and females employed in similar positions within the geographical recruitment area as of the 2010 Census.

Availability of full-time faculty was compared using national data since the college recruits nationally for full-time faculty

In determining under-utilization, the 80% rule was used. The ratio of workforce to availability is calculated as: $\text{Ratio} = (W/A) \times 100$

Example:

Workforce = 20% female workforce Ratio = $(20/23) \times 100 = 86.96\%$

Availability = 23% female availability

in this example, underutilization does not exist because the ratio exceed 80%

VI. IDENTIFICATION OF PROBLEM AREAS/PLAN FOR CORRECTIVE ACTION

Areas of Concern	Corrective Actions
Underutilization of minorities in full-time Faculty	Enhance efforts to recruit and retain minority faculty. Post faculty position in minority focused recruitment sources.
Underutilization of females in Service/Maintenance	Look deeper into the applicant pool to focus selection on qualified female applicants.
Underutilization of females in Police	Work with BHC Police on ways to recruit qualified female applicants.
Underutilization of females in Skilled Crafts	Look deeper into the applicant pool to focus selection on qualified female applicants.

VII. DEVELOPMENT AND EXECUTION OF ACTION PROGRAMS

A. Management Responsibility

Black Hawk College realizes that the ultimate success of affirmative action efforts will depend upon the degree of commitment of management at all levels to achieving objectives in this area. Managers at all levels should be aware their job duties include cooperating in efforts to comply with the EEO laws and the Affirmative Action Plan. Supervisory practices such as employee evaluations, counseling and discipline will be reviewed periodically to assure the practices are being administered properly and on a non-discriminatory basis. Supervisors are encouraged to seek the input of the EEO Officer with any questions regarding job-related personnel practices. The Company's rules and policies will be reviewed to ensure that they do not inadvertently discriminate against qualified persons on any prohibited basis.

B. Employment Procedures Analysis

The College will continue to review its employment process to ensure that any one, or combination of more than one policy, practice or procedure does not have a disparate impact upon minority or female candidates, or even given the absence of a disparate impact, might individually and negatively influence an individual minority's or woman's opportunity for employment as compared to a non-minority's or male's opportunity. This review is the responsibility of the Human Resources Department. It will include but not be limited to the following:

1. Analysis of all requirements for all new positions to ensure their job relatedness.
2. Analysis and monitoring of recruitment and selection procedures.
3. Auditing of hires to determine compliance with the objectives of the Affirmative Action Plan.

The College's use of the online NeoGov system will assist in accurately tracking and analyzing applicant, screening, and hiring data.

C. Recruiting

1. The College's recruiting practices will continue to include an effort to generate a large number of minority and female referrals. Vacancy notices will be sent to the following organizations throughout the district:
 - HOLA
 - Chronicle of Higher Education
 - Higher Ed Jobs
 - Indeed
 - Specialty websites and journals

2. All advertisements will indicate that the College is an Equal Opportunity Employer. Minority and female oriented media will be evaluated and used whenever it may productively assist the College in increasing its applicant flow.
3. The College will provide in-house training for employees who serve on hiring committees and all others involved in the screening and hiring process. This training will inform them of equal opportunity and affirmative action laws and regulations. Emphasis will be placed on understanding how these laws and regulations relate to their role in the process of screening, interviewing, and hiring.

D. Promotions

Promotions occur when an internal candidate applies for and is selected for an open position. Since the College's screening and hiring process complies with all affirmative action and equal opportunity laws and regulations and is subject to the College's own Affirmative Action policies and procedures, internal candidates are assured equal opportunity in this process.

E. Use of Tuition Waiver and Tuition Reimbursement

The College supports employee education through its tuition reimbursement program that is open to all regular full time employees for their use in self-advancement. All regular full time and part time employees are eligible for tuition waiver for classes taken at the College.

F. Formal and Informal Training Programs

The College supports employee development through internal training programs such as new employee orientation, supervisor development, faculty development, and job-related skill development. Training and development opportunities are offered without regard to race or gender and are available to all employees to whom a given training topic applies.

G. Technical Compliance with EEO Requirements

The College is in compliance with EEO requirements such as the display of posters and notices to subcontractors.

H. Non-Harassment Policy

The College has developed and vigorously enforces a non-harassment policy which applies to all staff, faculty, students, and vendors. Any student or employee who feels that he/she has been the victim of illegal harassment has the opportunity to seek relief within the College system. The

AA/EEO Office will conduct prompt, thorough, and impartial investigations of all harassment complaints and harassment incident reports, and corrective action will be taken where indicated. All employees participate in annual anti-harassment training and supervisors are provided additional training regarding their critical role in preventing harassment and addressing harassment issues.

I. Protection from Discrimination

Any employee or student who feels that he/she is being discriminated against on the basis of protected class membership has the opportunity to seek relief within the College system. The AA/EEO Office will investigate complaints and assist in correcting any discriminatory practices at the College. All administrators and representative of the College are charged with the responsibility to take appropriate action to ensure compliance.

VIII. INTERNAL AUDIT AND REPORTING SYSTEMS

The College maintains a personnel audit and reporting system to measure the effectiveness of the plan, determine the degree to which it has been able to meet goals and objectives, and to enable the College to evaluate additional areas where future action needs to be taken. To achieve this goal, the following records are maintained:

1. Applicant Flow Data
2. Hire Data
3. Promotion Data
4. Layoff Data
5. Recall Data
6. Termination Data
7. Training Data

These records are reviewed on a periodic basis by the AA/EEO Officer. If problems are identified, corrective actions are recommended. The AA/EEO Officer will discuss any problems with managers and supervisors and outline suggestions for solutions. Any managers or supervisors identifying any problem areas will report them to the AA/EEO Officer immediately.

The AA/EEO Officer personally tracks the hiring process for each job opening, reviewing documentation and approving decisions to interview and hire. The AA/EEO Officer is able to intervene during the process if any problem or concern is identified.

IX. CONSIDERATION OF MINORITIES AND WOMEN NOT IN THE WORKFORCE

The College will consider minorities and females not currently in the workforce who have the requisite skills for the job opening. The following are some methods by which the College will recruit these individuals:

1. The College forwards all vacancy notices to the local Job Service offices throughout the district;
2. Schools and community organizations promoting the interests of minorities and females are notified in seeking applicants for employment opportunities.

X. EXHIBITS

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- A. Purchasing Terms and Conditions Related to Affirmative Action
- B. Bidders Terms and Conditions Related to Affirmative Action

Exhibit A: Purchasing Terms and Conditions Related to Affirmative Action

STANDARD TERMS AND CONDITIONS INVITATION TO BID, REQUESTS FOR QUOTATION, PURCHASE ORDER CONTRACTS

(19) **NONDISCRIMINATION AND AFFIRMATIVE ACTION:** The Vendor agrees not to discriminate against any client, employee, or applicant for employment or services because of race, creed, color, national origin, sex, marital status, age or the presence of any sensory, mental, or physical disability with regard to, but not limited to, the following: Employment upgrading, demotion or transfer; recruitment or recruitment advertising; layoffs or termination; rates of pay or other forms of compensation; selection for training; rendition of services. It is further understood that any Vendor who is in violation of this clause or any applicable affirmative action program shall be barred forthwith from receiving awards of any purchase order from the State unless a satisfactory showing is made that discriminatory practices or noncompliance with applicable affirmative action programs have terminated and that a recurrence of such acts is unlikely.

(24) **SEXUAL HARASSMENT:** State, Federal Laws, and Black Hawk College Affirmative Action/Equal Opportunity Guidelines prohibit sexual harassment and define it as sex discrimination. Acts of sexual harassment by the Contractor shall result in actions by the College to remove Contractor from the qualified bidders list until such time as acts are remedied as provided by Federal and State laws.

Exhibit B: Bidders Terms and Conditions Related to Affirmative Action

TERMS AND CONDITIONS

4. **Non-Discrimination and Affirmative Action:** The Vendor agrees not to discriminate against any client, employee, or applicant for employment or services because of race, creed, color, national origin, sex, marital status, age or the presence of any sensory, mental, or physical disability with regard to, but not limited to, the following: Employment upgrading, demotion or transfer; recruitment or recruitment advertising; layoffs or termination; rates of pay or other forms of compensation; selection for training; rendition of services. It is further understood that any Vendor who is in violation of this clause or any applicable affirmative action program shall be barred forthwith from receiving awards of any purchase order from the State unless a satisfactory showing is made that discriminatory practices or noncompliance with applicable affirmative action programs have terminated and that a recurrence of such acts is unlikely.

5. **Sexual Harassment:** An amendment to the Illinois Human Rights Act requires eligible bidders for state contracts to implement detailed and specific sexual harassment policies. Every party bidding for and/or obtaining a public contract is required to have written sexual harassment policies that must include, at a minimum, a statement that sexual harassment is illegal, the definition of sexual harassment under state law, a description of sexual harassment (utilizing examples), the party's internal complaint process including penalties, the legal recourse, investigative and complaint process available through the Illinois Human Rights Department and the Commission including directions on how to contact the Department and Commission and the applicability of protection against as provided by the Human Rights Act.

XI. **AFFIRMATIVE ACTION PLAN FOR DISABLED WORKERS, SPECIAL DISABLED VETERANS, VETERANS OF THE VIETNAM ERA AND OTHER COVERED VETERANS**

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- A. Policy-Affirmative Action for Disabled Workers and Covered Veterans
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- F. Determination of Disability
- G. Intimidation and Interference

A. Policy-Affirmative Action for Disabled Workers and Covered Veterans

The College will:

1. Ensure that there is no discrimination against any employee or applicant for employment because of physical or mental disability, disabled veteran status, Vietnam Era or other covered veteran status in regard to any position for which the employee or applicant is qualified.
2. Take affirmative action to employ and advance in employment all qualified disabled individuals and covered veterans at all levels of employment. Such action shall apply to all employment practices, including, but not limited to, the following: hiring, upgrading, demotion, recruitment, advertising, layoff or termination, rates of pay or other forms of compensation, benefits, selection for training, and tuition assistance.
3. Comply with all applicable rules, regulations and relevant orders of the Secretary of Labor regarding non-discrimination of disabled and covered veteran applicants and employees.

In keeping with the above objectives, the College will conduct a continuing analysis of all personnel actions to ensure equal opportunity and affirmative action for all disabled and covered veteran applicants and employees.

B. Plan Requirements

1. This Affirmative Action Plan is reviewed and updated annually. If there are any significant changes in procedures, rights or benefits as a result of the annual updating, those changes will be communicated to employees and applicants for employment.
2. The College takes affirmative action with respect to those applicants or employees whose disability or veteran status the College has actual knowledge. The College does not search the medical files of any applicant or employee to determine the existence of a disability.
3. The Affirmative Action Plan is available for inspection to any employee or applicant for employment upon request.
4. The appropriate required disabled and covered veteran affirmative action clauses will be included in all covered contracts, subcontracts and purchase orders and such provisions are binding on each subcontractor or vendor.
5. Through its AA/EEO policy statement, the College states its intent to take affirmative action to employ and advance in employment qualified disabled and covered veteran employees and applicants for employment.

6. The College will invite all employees who believe themselves covered by the Act and who wish to benefit under the Affirmative Action Plan to identify themselves to a Human Resources representative. This invitation states that the information is voluntary, that it will be kept confidential, that refusal to provide it will not subject the applicant or employee to any adverse treatment and that it will be used only in accordance with the Act. If an applicant or employee so identifies himself or herself, the College will seek the advice of the applicant or employee regarding proper placement and appropriate accommodation.

C. Affirmative Action Practices and Procedures

1. Proper Consideration of Qualifications

The Director of Human Resources reviews the College's personnel processes periodically to determine whether its procedures assure careful, thorough and systematic consideration of the job qualifications of known disabled and covered veteran applicants and employees for job vacancies filled either by hiring or promotion, and for all training opportunities offered or available. When applicants or employees are selected for hire, promotion or training, the College undertakes any reasonable accommodation which makes it possible to place a disabled individual or disabled veteran on the job.

2. Physical and Mental Qualification

- a. When a position is established or becomes vacant, the College reviews all physical and mental job qualification requirements to ensure that, to the extent qualification requirements tend to screen out qualified disabled individuals or disabled veterans, they are job related and are consistent with business necessity and safe performance on the job.
- b. Whenever physical or mental job qualification requirements are applied in the selection of applicants or employees for employment, or other change in employment status (such as promotion, demotion or training) the College reviews those requirements to be sure they are consistent with business necessity and the safe performance of the job. The College will demonstrate, as necessary, that it has complied with this requirement.
- c. Whenever the College inquires into an applicant's (post job offer) or employee's physical or mental condition or conducts a medical examination post offer or change in employment

status, information obtained in response to such inquiries or examination is kept confidential except that:

- i. Supervisors and managers may be informed regarding restrictions on the work or duties of disabled individuals and regarding accommodations.
- ii. Government officials investigating compliance with the Act shall be informed.

3. Accommodation to Physical and Mental Limitations of Employees

The College will make a reasonable accommodation to the physical and mental limitation of an employee or applicant unless proven that such an accommodation would impose an undue hardship on the conduct of the College's business. In determining the extent of the College's accommodation obligations, the following factors among others are considered: business necessity and financial cost.

4. Compensation

In offering employment or promotions to disabled and covered veteran workers, the College does not reduce the amount of compensation offered because of any disability income, pension or other benefit the applicant or employee receives from another source.

D. Outreach, Positive Recruitment and External Dissemination of Policy

The AA/EEO Officer periodically reviews employment practices to determine whether affirmative action for qualified disabled and covered veterans is being practiced. To practice the required affirmative action, the College will or has undertaken the following outreach and positive recruitment activities:

1. The College's Affirmative Action/Equal Employment Opportunity statement and the existence of this Affirmative Action Plan is communicated to all employees involved in the screening, interviewing, and hiring of applicants. The College's obligation is explained in such a manner as to foster support and to encourage such persons to take the necessary action to aid the College in meeting this obligation.
2. The AA/EEO Officer and other staff monitor all employment functions and processes, placements, transfers, promotions and terminations at all levels to ensure that the College's obligation to engage in affirmative action to employ and promote qualified disabled and covered veteran workers is being fully implemented.

3. The College periodically informs all employees and prospective employees of its commitment to engage in affirmative action to increase employment opportunities for qualified disabled and covered veteran workers. The following means are used to accomplish this objective:
 - a. The College's AA/EEO Statement, which references the disabled and covered veterans, is posted in all College locations.
 - b. The official equal opportunity posters, which reference the disabled and covered veterans, are appropriately displayed.
 - c. Recruiting sources, agencies and schools are made aware of the College's status as an Equal Employment Opportunity employer.
 - d. Prospective employees can request to see the College's EEO/AA Policy Statement when they apply for employment.
4. The College will enlist the assistance and support of recruiting sources to aid in providing meaningful employment opportunities to qualified disabled and covered veteran workers.

E. Responsibility for Implementation

The AA/EEO Officer is responsible for overseeing and ensuring all College affirmative action activities for the disabled and covered veterans. His/Her identity appears on all internal and external communications regarding the College's affirmative action plans. This individual has the support of top management to carry out this plan. He/She is responsible for:

1. Developing policy statements, affirmative action plans, and the internal and external communications techniques. This includes regular discussions with managers, supervisors and employees to be certain the College's policies are being followed.
2. Advising supervisors that the College must make efforts to prevent harassment of employees including those placed through affirmative action efforts.
3. Identifying problem areas in the implementation of this Plan in conjunction with line management and disabled or covered veteran employees.
4. Developing solutions. This is particularly important for the accommodation requirements.
5. Designing and implementing an audit reporting system that will:
 - a. Measure the effectiveness of the College's programs.

- b. Indicate need for remedial action.
 - c. Determine the degree to which the College's objectives have been attained.
 - d. Determine whether known disabled and covered veteran employees have had the opportunity to participate in all College sponsored educational, training, recreational and social activities.
 - e. Ensure that all departments are in compliance with the Acts.
- 6. Serving as liaison between the College and enforcement agencies.
 - 7. Serving as liaison between the College and organizations of and for disabled persons and covered veterans.
 - 8. Keeping management informed of the latest developments in the entire affirmative action area.

F. Determination of Disability

If the College requires a determination of an applicant's (post job offer) or employee's disability, it may require the applicant or employee to provide medical documentation of the impairment, or, in the alternative, may require the applicant or employee to undergo a medical examination at the College's expense.

G. Intimidation and Interference

The College will take all necessary steps to ensure that no person intimidates, threatens, coerces or discriminates against any individual for the purpose of interfering with the filing of a complaint, furnishing information or assisting or participating in any manner in an investigation, compliance review, hearing or any other activity related to the administration of the Acts.