



GAVILAN COLLEGE

GAVILAN JOINT COMMUNITY COLLEGE DISTRICT

Equal Employment Opportunity Plan



Updated: February 2024

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Plan Component 1: Introduction

Gavilan Joint Community College District (District) is dedicated to proactively cultivating and sustaining a welcoming and inclusive work environment. The District aspires to be Diverse, Purposeful, Inclusive, and Equitable, as reflected in the District's Principles of Community. The District values the worth and dignity of every person, the pursuit of truth, the acquisition of knowledge, and the nurture of democratic citizenship. These values provide the foundation for an environment of civility, honesty, cooperation, and professionalism.

The District's Equal Employment Opportunity (EEO) Plan illustrates the District's commitment to equal employment opportunity in its recruitment and hiring policies and practices pursuant to the applicable Regulations of the Board of Governors of the California Community Colleges (Title 5 of the California Code of Regulations, Section 53000 *et seq.*).

The EEO plan includes a summary of the complaint procedure for allegations of noncompliance with the EEO Plan and the District's EEO Programs; the use of an Equal Employment Opportunity Advisory Committee (EEOAC) to help facilitate implementation of this Plan; highlights methods to support equal employment opportunity and an environment that is welcoming to all; and identifies procedures for dissemination of the EEO Plan. The EEO Plan is also intended to assist with this important dialogue of inclusion and equity and serve as a road map for further professional development.

The District is also committed to educational excellence. The District aspires to be an exemplary, student-centered community college through leadership, planning, and a commitment to ongoing improvement. Its services and programs are designed to instill the values of critical thinking, lifelong learning, cultural understanding, and community service. The District's quality of service to students is closely bound to the quality of the college staff.

The District engages, empowers, and enriches students of all backgrounds and abilities to build their full academic, social, and economic potential. The District is a designated Hispanic Serving Institution (HSI) and is a community of people from diverse racial, ethnic, linguistic, and socio-economic backgrounds, representing a wide range of national origins, religions, political beliefs, physical and mental abilities, ages, sexual orientations, and gender expressions.

The District will endeavor to attract, hire, and retain faculty and staff who are sensitive to, and knowledgeable of, the needs of the continually changing student body. We recognize the benefits of workforce diversity in positively impacting the quality of instruction, student services programs, generation of ideas, innovation and creating a stronger sense of community throughout our campus.

Questions about the District's EEO Plan can be directed to Lucy Alvarez, Director, Human Resources and Labor Relations. The District's Board of Trustees (Board) adopted the Equal Employment Opportunity (EEO) Plan on February 13, 2024.

Dr. Pedro Avila
Superintendent/President

Plan Component 2: Definitions

Reference: California Code of Regulations (“CCR”), Title 5, § 53001

Adverse Impact:

“Adverse impact” means a disproportionate negative impact to a group protected from discrimination pursuant to Government Code Section 12940, arising from the effects of an employment practice as determined according to a valid statistical measure (such as those outlined in the Equal Employment Opportunity Commission’s “Uniform Guidelines on Employee Selection Procedures”).

Diversity:

“Diversity” means a condition of broad inclusion in an employment environment that offers equal employment opportunity for all persons. The achievement of diversity within a workforce requires the presence, respectful treatment, and inclusion of individuals from a wide range of ethnic, racial, age, national origin, religious, gender, sexual orientation, disability, and socioeconomic backgrounds, in all aspects of the workplace.

Equal Employment Opportunity:

“Equal employment opportunity” means that all qualified individuals have a full and fair opportunity to compete for hiring and promotion and to enjoy the benefits of employment with the District. Equal employment opportunity should exist at all levels, in all job categories. Equal employment opportunity also involves:

- 1) Identifying and eliminating barriers to employment that are not job related, such as reliance on preferred job qualifications that do not reasonably predict job performance.
- 2) Updating job descriptions and/or job announcements to accurately reflect the knowledge, skills, and abilities of the position, including a commitment to equity; and
- 3) Creating an environment that fosters cooperation, acceptance, democracy, and free expression of ideas, and is welcoming to all persons free from discrimination related to the categories protected by Government Code Section 12940.

Equal Employment Opportunity Plan:

An “equal employment opportunity plan” is a written document that describes the District’s EEO program. The District’s EEO Plan shall include: 1) analysis of the District’s work force; and 2) descriptions of the District’s program and strategies, informed by the District’s workforce analysis, that it is implementing or will implement, to promote equal employment opportunity.

Equal Employment Opportunity Program:

An “equal opportunity program” refers to the combination of District strategies implemented to promote equal employment opportunity. Such programs should be informed by the District’s longitudinal workforce and applicant analyses.

In-house or Promotional Only:

“In-house or promotional only” hiring means that only existing District employees are eligible for a position.

Job Categories:

For purposes of this EEO Plan, “job categories” includes executive/administrative/managerial, faculty and other instructional staff, professional non-faculty, secretarial/clerical, technical and paraprofessional, skilled crafts, and service and maintenance.

Monitored Group:

“Monitored group” means groups for which the District must provide demographic data pursuant to Section 53004.

Person with a Disability:

“Person with a disability” means any person who:

- 1) Has a physical or mental impairment as defined in Government Code, Section 12926 which limits one or more of such person’s major life activities;
- 2) Has a record of such an impairment; or
- 3) Is regarded as having such an impairment.

A person with a disability is “limited” if the condition makes the achievement of the major life activity difficult.

Reasonable Accommodation:

A “reasonable accommodation” means the efforts made by the District in compliance with Government Code Section 12926.

Screening or Selection Procedures:

“Screening or selection procedures” means any measure, combination of measures, or procedures used as a basis for any employment decision. Selection procedures include the full range of assessment techniques, including performance tests, physical, educational, and work experience requirements, interviews, application reviews, and similar techniques. Screening and selection procedures shall also include consideration of equivalencies pursuant to Sections 53022 and 53430 and applicant pool review pursuant to Section 53023.

Underrepresented Group:

“Underrepresented group” means any monitored group for which the percentage of persons from that group employed by the District in a job category is below eighty percent (80%) of the projected representation for that group and job category.

Plan Component 3: Policy Statement

Reference: CCR, Title 5, § 53002; Board Policies 1200, 3410, 3420 and 7100; Administrative Procedure 3420

The District is committed to equal opportunity in employment. Equal employment opportunity includes not only a process for equal opportunity in hiring, but also practices and processes that create inclusive, respectful work environments. As such, the District aims to foster a climate of acceptance, with the inclusion of faculty and staff from a wide variety of backgrounds.

The District believes that diversity in the academic environment fosters cultural awareness, mutual understanding, harmony and respect, and suitable role models for all students. The Board therefore commits itself to promote the total realization of equal employment opportunity through a continuing equal employment opportunity program.

It is the District's policy to provide equal employment opportunities to all applicants and employees regardless of race, religious creed, color, national origin, immigration status, ancestry, physical disability, mental disability, medical condition, genetic information, marital status, sex, gender, gender identity, gender expression, age, sexual orientation, or military and veteran status.

This Policy Statement aligns with and incorporates by reference the following Board Policies: 1200, District Mission; 3410, Nondiscrimination; 3420, Equal Employment Opportunity; and 7100, Commitment to Diversity.

Plan Component 4: Delegation of Responsibility, Authority & Compliance

Reference: CCR, Title 5, §§ 53003(c)(3) and 53020

The District's goal is for all employees to promote and support equal employment opportunity because it requires a commitment and a contribution from every segment of the District. The general responsibilities for the prompt and effective implementation of the EEO Plan are set forth below.

Board of Trustees

The Board is ultimately responsible for proper implementation of the District's EEO Plan at all ~~all~~ of District operations, and for ensuring that District staff responsible for implementation and oversight of the Plan are making measurable progress towards equal employment opportunity through the strategies described in the EEO Plan. The Board is responsible for adopting a Plan that is in compliance with the provisions of the California Code of Regulations. Further, the Board will oversee the Superintendent/President's responsibility to ensure the Plan shall:

- a) Be developed in collaboration with the District's Equal Employment Opportunity Advisory Committee established pursuant to section 53005;
- b) Be reviewed and adopted a regular meeting of the Board of Trustees where it is agendized as a separate action item;
- c) Cover a period of 3 years, after which a new or revised plan shall be adopted; and
- d) Be submitted to the State Chancellor's Office at least 90 days prior to its adoption. Comments received from the Chancellor's Office will be presented to the Board prior to its adoption.

Superintendent/President

The Board delegates to the Superintendent/President the responsibility for ongoing implementation of the EEO Plan and for providing leadership in supporting the District's equal employment opportunity policies and procedures, further delegating such authority as appropriate. The Superintendent/President shall advise the Board concerning statewide policy emanating from the Board of Governors of the California Community Colleges and direct the publication of an annual report on EEO Plan implementation. The Superintendent/President shall evaluate the performance of all administrative staff who report directly to the Superintendent/President on their ability to follow and implement the EEO Plan.

Equal Employment Opportunity Officer

The District has designated the Director of Human Resources and Labor Relations as its EEO Officer who is responsible for the day-to-day implementation of the EEO Plan. If the designation of the EEO Officer changes before the next revision of the EEO Plan, the District will notify employees and applicants for employment of the new designee.

The EEO Officer is responsible for administering, implementing, and monitoring the EEO Plan and for ensuring compliance with the requirements of Title 5, Sections 53000 *et seq.* The EEO Officer is also responsible for ensuring that applicant pools and selection procedures are properly monitored as required by Title 5, Sections 53023 and 53024; preparing annual reports; receiving complaints described

in Component 6 of the EEO Plan; and ensuring that such complaints are promptly and impartially investigated, as needed. The EEO Officer shall ensure prompt and effective implementation of the requirements of the EEO Plan.

Equal Employment Opportunity Advisory Committee (EEOAC)

The District has established an EEOAC to act as an advisory body to the EEO Officer and the District as a whole to promote understanding and support of EEO policies and procedures. The EEOAC shall assist in the development and implementation of the EEO Plan in conformance with state and federal regulations and guidelines, monitor equal employment opportunity progress, provide strategies to meet the EEO Plan requirements, and provide suggestions for EEO Plan revisions as appropriate. The EEOAC shall operate in accordance with Plan Component 5.

Screening Committees

A screening committee member, or any organization or individual, whether or not an employee of the District, who acts on behalf of the Board with regard to the recruitment and screening of personnel is subject to the requirements of the EEO Plan and applicable Title 5 provisions.

Agents of the District

Any organization or individual, who participates in District recruitment or screening of personnel, whether as an employee or as a contractor, is an agent of the District for such purposes only and is subject to all the requirements of the EEO Plan.

Through the authority articulated in this Plan Component and the EEO Plan generally, the District shall make continuous, good-faith efforts to implement the EEO Plan, achieve employee diversity, and avoid disparate impacts, consistent with state and federal law.

Plan Component 5: Advisory Committee

Reference: CCR, Title 5, § 53005

The District has established the EEOAC to assist the District in developing, revising, and implementing District EEO Programs and the EEO Plan. The EEOAC may also assist in promoting an understanding and support of EEO policies and procedures. The EEOAC may work in coordination with other groups on campus to sponsor and support events, trainings, or other activities that promote equal employment opportunity, nondiscrimination, retention, and diversity. When appropriate, the EEOAC will make recommendations to the Board, the Superintendent/President, or the EEO Officer to update the EEO Plan in accordance with applicable policies, procedures, and legislation.

The EEO Officer will ensure that the EEOAC and all members of the Board receive training in all of the following:

- a) The requirements of Title 5, Section 53003 and of state and federal nondiscrimination laws;
- b) Identification and elimination of bias in hiring;
- c) The educational benefits of workforce diversity; and
- d) The role of the EEOAC in drafting and implementing the District's EEO plan.

The committee shall be composed of a diverse membership and include members from District stakeholder groups, including, but not limited to, students, faculty, and classified staff. The EEOAC shall include at a minimum one (1) member of each constituency group:

- a. faculty member appointed by the Academic Senate President;
- b. classified member appointed by the Classified Employees Union;
- c. leadership/confidential; and
- d. student representative.

Terms of office for the members shall be three (3) years; student representatives will serve annually. The EEOAC shall hold a minimum of four meetings per fiscal year, with additional meetings if needed to review EEO and diversity efforts, programs, policies, and progress. The EEOAC will review the Plan at least once annually, and any revisions to the Plan will be submitted to the Board and the Office of the Chancellor of the California Community Colleges (Chancellor's Office).

Plan Component 6: Complaint Procedures

References: CCR, Title 5, §§ 53003(c)(4), 53026, and 59300 et seq.; BP/AP 3410 Nondiscrimination; AP 3435 Discrimination and Harassment Investigations

A. Complaints Alleging Violation of the Equal Employment Opportunity Regulations (Title 5, Section 53026).

The District has established the following process permitting any person to file a complaint alleging that the requirements of the equal employment opportunity regulations have been violated. If the complainant alleges misconduct by the EEO Officer, a complainant should file their complaint with the Superintendent/President. Any complainant who believes that the equal employment opportunity regulations have been violated may file a complaint describing in detail the alleged violation (e.g., violations of current in-house and promotional hiring processes), using the form identified in Administrative Procedure (“AP”) 3435 and authorized by the Chancellor of the California Community Colleges. The District may request, but shall not require, a complainant to submit a complaint on the form prescribed by the Chancellor of the California Community Colleges. A copy of the form will be available on the District’s Website at www.gavilan.edu/jobs and the District Human Resources Department. All complaint forms shall be signed and dated by the complainant, and contain, to the best of the complainant’s ability, the names of the individuals involved, the date(s) of the event(s) at issue, and a detailed description of the actions constituting the alleged violation.

In addition, complaints can be filed using the districts reporting options found here:

https://www.gavilan.edu/administration/care-BIT_team/incident_reporting.php.

The District may return without action any complaints that are inadequate or defective because they do not state a clear violation of the EEO regulations. All returned complaints must include a District statement of the reason for returning the complaint without action. Within ten (10) days of receipt of returned complaints, Complainants may submit additional information to the EEO Officer in an attempt to cure the defective complaint but have no other rights to appeal the District’s determination.

- i. **Complaints involving current hiring processes** must be filed as soon as possible after the occurrence of an alleged violation and not later than sixty (60) days after such occurrence unless the complainant can verify a compelling reason for the District to waive the sixty (60) day limitation. A complainant may not appeal the District’s determination pursuant to Title 5, section 53026, to the Chancellor’s Office, but under some circumstances, violations of the equal employment opportunity regulations in Title 5 may constitute a violation of a minimum condition for receipt of state aid. In such a case, a complaint can be filed with the California Community Colleges Chancellor’s Office, but the complainant will be required to demonstrate that they made previous reasonable, but unsuccessful, efforts to resolve the alleged violation at the college and/or District level using the process provided by Title 5, section 53026.
- ii. **Complaints alleging violations of the EEO Plan that do not involve current hiring processes** must be filed as soon as possible after the occurrence of an alleged violation and not later

than ninety (90) days after such occurrence unless the violation is ongoing. A complainant may not appeal the District's determination pursuant to section 53026 to the Chancellor's Office, but under some circumstances, violations of the equal opportunity regulations in Title 5 may constitute a violation of a minimum condition for receipt of state aid. In such a case, a complaint can be filed with the Chancellor's Office, but the complainant will be required to demonstrate that they made previous reasonable, but unsuccessful, efforts to resolve the alleged violation at the college and/or district level using the process provided by section 53026.

Upon completion of the investigation, the Superintendent/President or designee, as appropriate, shall review the complaint and investigation findings and issue a notice of conclusion of the investigation and summary of findings on all accepted complaints, to the complainant and any respondents. The District will strive to issue a notice of conclusion of investigation and summary of findings within ninety (90) days of the filing of the complaint but may extend this deadline for good cause.

In the event that a complaint filed under Title 5, section 53026, alleges unlawful discrimination or harassment, the complaint will be processed according to the requirements of Title 5, section 59300 et seq. and AP 3435, as addressed in Section B below.

B. Complaints Alleging Unlawful Discrimination or Harassment (Title 5, Section 59300 et seq.)

The District has adopted procedures for complaints alleging unlawful discrimination or harassment. The Director, Human Resources and Labor Relations is responsible for receiving such complaints and shall conduct or assign the investigation in a timely manner in accordance with the process set forth in the District's discrimination and sexual harassment complaint procedures, stated in AP 3430 and AP 3435, which are located at the District website: www.gavilan.edu or by using the following links: <https://go.boarddocs.com/ca/giccd/Board.nsf/goto?open&id=BZ75467E009D> and <https://go.boarddocs.com/ca/giccd/Board.nsf/goto?open&id=BD4VP681A8C7>.

Plan Component 7: Notification to District Employees

Reference: CCR, Title 5, § 53003(c)(5)

The commitment of the Board and the Superintendent/President to equal employment opportunity is emphasized through the broad dissemination of its EEO Policy Statement (located in Component 3 of this EEO Plan) and the EEO Plan.

Each year, the District will provide all employees with a copy of the EEO Policy Statement and a written notice describing the provisions of the EEO Plan by incorporating notification in the selection, EEO and mandatory sexual harassment trainings. The Human Resources department will provide all new employees with a copy of the written notice, the EEO policy statement and the District's Nondiscrimination policy when they commence their employment with the District. The written notice will emphasize the importance of the employee's participation and responsibility in ensuring the EEO Plan's implementation. The written notice will also be printed on all job announcements.

The EEO Plan and subsequent revisions will be distributed via email to the District's Board, Superintendent/President or their designee, administrators, the Academic Senate leadership, union representatives, and members of the EEOAC. The EEO Policy Statement and EEO Plan will also be available on the District's website, and when appropriate, may be distributed via email.

Plan Component 8: Training for Screening/Selection Committees

References: CCR, Title 5, §§ 53003(c)(6) and 53020(c)

Any organization or individual, who participates in District recruitment and screening of personnel, whether as a District employee or official or as a third-party, is subject to all of the Title 5 regulations on equal employment opportunity (Section 53000, *et. seq.*) and is expected to comply with the District's EEO Plan.

All individuals directly participating in the selection and screening process shall receive training prior to their initial participation on a screening committee. Following their initial training, a person serving on any subsequent screening or selection committee must have received training within the prior 24 months of their service on such committee. This training is mandatory; individuals who have not received this training as described in this paragraph will not be allowed to serve on screening or selection committees.

The mandatory training will include, but may not be limited to:

- The requirements of the Title 5 regulations on equal employment opportunity (Section 53000 *et. seq.*) and the requirements of federal and state nondiscrimination laws;
- The educational benefits of workforce diversity;
- The elimination of bias in hiring decisions; and
- Best practices in serving on a screening or selection committee.

The EEO Officer will be responsible for ensuring that all individuals serving on a screening or selection committee receive this mandatory training.

Screening and selection committees shall include a diverse membership whenever possible, to ensure a variety of perspectives are included in the assessment of applicants. District screening committees will be comprised of members from each constituency group including classified, faculty, leadership/confidential, and students. The EEO Officer will monitor to ensure that diverse representation includes committee members representing various departments. If the EEO Officer determines that the screening committee membership should be more diverse, the EEO Officer may appoint additional members as needed.

Plan Component 9: Annual Written Notice to Community Organizations

Reference: CCR, Title 5, 53003(c)(7)

The EEO Officer will provide annual written notice to appropriate community-based and professional organizations concerning the EEO Plan via the listserv of the South County Collaborative, of which the College is a member.

The notice will include a website link to the EEO Plan and shall solicit their assistance in identifying a qualified, diverse pools of applicants. The notice will also include the website address where the District advertises its job openings and the Human Resources department phone number to call in order to obtain employment information.

The District will actively seek to reach those institutions, organizations, and agencies that may be recruitment sources, including the organizations listed in Appendix A, which may be revised from time to time as necessary. An annual scan of South County organizations will inform the revision of this list.

Plan Component 10: Process for Gathering Information and Periodic Longitudinal Analysis of District Workforce & Applicant Pool

References: CCR, Title 5, §§ 53003(c)(8), 53004, and 53006

The District will gather the information specified below for the purpose of conducting periodic, longitudinal analysis of the District's employees and applicants, broken down by number of persons from monitored groups in each job category to determine whether additional diversification measures are required and to implement and evaluate the effectiveness of those measures. The District shall conduct this data review as part of its EEO Plan renewal and may conduct additional periodic data reviews more frequently based on the District's size, demographics, and other unique factors. Data collection and analysis will begin at the conclusion of year 1 of the Plan.

EEO DATA COLLECTION

The District allows applicants and employees to identify their gender (including non-binary options), ethnic group identification, and, if applicable, their disability status in a manner prescribed by the Chancellor and consistent with state and federal law (EEO Data). The District will keep EEO Data confidential and shall use it only in research, monitoring, evaluating the effectiveness of the District's EEO program, or another similar purpose authorized by law. Only District employees whose job duties require them to have access to such data will have such access, unless otherwise required by law.

The District allows applicants and employees to provide the following Monitored Group information:

1. Gender Identification

The District requests that employees and applicants self-identify as female, male, or non-binary.

2. Race and Ethnicity Identification

The District requests that employees and applicants self-identify into the following ethnicity categories:

a. Hispanic or Latino

A person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin regardless of race.

b. White (Not Hispanic or Latino)

A person having origins in any of the original people of Europe, the Middle East, or North Africa.

c. Black or African American (Not Hispanic or Latino)

A person having origins in any of the black racial groups of Africa.

d. Native Hawaiian or Other Pacific Islander (Not Hispanic or Latino)

A person having origins in any of the peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

e. Asian (Not Hispanic or Latino)

A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian Subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.

f. *American Indian or Alaska Native (Not Hispanic or Latino)*

A person having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.

g. *Two or More Races*

All persons who identify with more than one of the above five races (White, Black or African American, Native Hawaiian or Other Pacific Islander, Asian, American Indian or Alaska Native). For the purposes of this group, identifying as Hispanic or Latino and only one of the listed five race groups does NOT qualify under this category.

3. Disability Identification

The District requests that all employees self-identify their disability status, if any, by using the following definition, consistent with the Fair Employment and Housing Act:

a. *“Disabled person”*

Any person who (1) has a physical or mental impairment which limits one or more of such person’s major life activities, (2) has a record of such impairment, or (3) is regarded as having such impairment.

b. *“Major life activities”*

Functions such as caring for oneself, performing manual tasks, walking, seeing, hearing, talking, breathing, learning, and working.

EEO DATA COLLECTION MONITORED GROUP IDENTIFICATION ISSUE

There may be significant numbers of employees or applicants who decline to identify their gender, ethnicity, or disability status with the District. The District shall make an effort to capture this information accurately, and it encourages all persons to provide the above data. The District understands that employees and applicants voluntarily submit EEO Data and will not require employees or applicants to respond.

The District’s historical demographic data and workforce analysis data can be found on the Human Resources website at: www.gavilan.edu/hr.

LONGITUDINAL ANALYSIS TO IDENTIFY ADVERSE IMPACT

Once the District gathers the EEO Data described above, the District’s Human Resources Department will assign every employee and applicant to one of the seven job categories identified in Plan Component 2. The District will also include data for employees and applicants that allows the District to track the composition and diversity of who is hired and retained over time, disaggregated by college, discipline, job category, and other relevant measures.

The District will then conduct a periodic, longitudinal analysis of employees and applicants, broken down by number of persons from monitored group status in each job category to determine whether additional diversification measures are required. Specifically, the District will compare the composition of initial applicant pools, qualified pools, and applicants recommended for interview to identify any adverse impact of the District’s pre-hiring and hiring strategies, which exists where the selection rate for a monitored group is less than four-fifths (or 80%) of the selection rate for the group with the highest

rate.

The District will use the EEO data to identify adverse impacts as a result of any of the following and will make improvements to reduce these impacts:

- a. Minimum and desired qualifications that may create barriers
- b. Advertising and recruitment strategies
- c. Selection processes
- d. Onboarding and orientation processes

The District will work closely with the EEOAC and District's Equity Committee to utilize the longitudinal analyses and evaluate District trends. The EEOAC in collaboration with the Human Resources will work closely to identify gaps in areas such as promotion, retention, voluntary resignation, termination, and discipline.

DISTRICT STRATEGIES TO MITIGATE IDENTIFIED ADVERSE IMPACT

Review of Qualified Applicant Pools

The qualified applicant pool will be reviewed so that no monitored group is adversely impacted. Once the qualified applicant pool is approved, the pool may be forwarded to the screening/selection committee. The pool's EEO Data will not be provided to the screening/selection committee in order to ensure all applicants are considered fairly.

A. Qualified Applicant Pool

Before the qualified applicant pool is forwarded to the screening/selection committee, its composition will be reviewed to determine if its makeup is consistent with the District's diversity goals of its EEO Plan. If it not consistent with the District's diversity goals, effective steps will be taken to address any identified adverse impact before the selection process continues. Such steps may include, but are not limited to:

- Extending the deadline and undertaking inclusive outreach efforts to ensure that members of the adversely impacted group have equal opportunity to seek employment with the District.

If any identified adverse impact persists, the selection process may proceed only if:

- The job announcement does not require qualifications beyond the statewide minimum qualifications, or
- Locally established qualifications beyond state minimum qualifications, if any, are demonstrated to be job-related and consistent with business necessity and suitable alternative selection procedures to reduce the adverse impact were unavailable.

Once the qualified applicant pool is approved, the pool will be forwarded to the screening/selection

committee for screening, interviews, and final recommendations for hiring consideration.

Screening/Selection Committee Procedures

The District seeks to employ qualified persons with a broad range of backgrounds and abilities who have the knowledge and experience to work effectively in a diverse environment. The selection process is based on merit, and will extend to all candidates a fair, impartial examination of qualifications based on job-related criteria. The District's Recruitment and Hiring Procedures will include in its section on applicant screening by screening/selection committees the following provisions:

- a) All screening or selection techniques, including the procedure for developing interview questions, and the selection process as a whole, will be:
 - 1) Designed to ensure that, for all positions, meaningful consideration is given to the extent to which applicants demonstrate a sensitivity to and understanding of the diverse academic, socioeconomic, cultural, disability, gender identity, sexual orientation and ethnic backgrounds of community college students; this consists of including at a minimum one diversity question as part of the interview questions for all recruitments.
 - 2) Designed to ensure that for all faculty and administrative positions, meaningful consideration is given to the extent to which applicants demonstrate knowledge of multiculturalism, of training in cultural proficiency, and knowledge of the history and culture of underrepresented groups and groups that have experienced discrimination;
 - 3) Based solely on job-related criteria; and
 - 4) Designed to avoid an adverse impact, and monitored by means consistent with this section to detect and address adverse impact which does occur for any monitored group.
- b) When possible, every effort will be made, within the limits allowed by federal and state law, to ensure selection/screening committees include a diverse membership, which will bring a variety of perspectives to the assessment of applicant qualifications. Selection/screening committees will be encouraged to include members from monitored groups.
- c) The EEO Office should approve the makeup of selection/screening committees. If the EEO Officer does not approve a selection/screening committee for lack of diversity, they should take necessary steps to remedy the lack of diversity.
- d) Before a person can serve on a selection/screening committee, they must complete EEO and diversity training, as outlined in Component 8 of this EEO Plan.
- e) Interviews must include at least one question which assess the candidate's understanding of and commitment to equal employment opportunity and their level of cultural proficiency.
- f) All screening materials must be approved for compliance with equal employment opportunity principles.
- g) The District will not designate or set aside particular positions to be filled by members of any group defined in terms of ethnic group identification, race, color, ancestry, national origin, age, sex, religion, sexual orientation, marital status, disability, or medical condition, or engage in any other practice, which would result in discriminatory or preferential treatment prohibited by state or federal law. The District will not apply the *Plan* in a rigid manner that has the purpose or effect of so discriminating or targeted recruitment.
- h) The governing board or its designee shall make all final hiring decisions based upon careful

review of the candidate or candidates recommended through the screening/selection committee. This includes the right under Title 5, section 53024, subdivision (f), to reject all candidates and to order further review or to reopen the position where necessary to achieve the objectives of the Plan or to ensure equal employment opportunity.

The District will review the pattern of its hiring decisions over time, and if it determines that those patterns do not meet the objectives of the Plan, the district will request the EEO Office, with support from the EEOAC to recommend new methods to meet the Plan objectives, or if necessary, to modify the Plan itself to ensure equal employment opportunity.

When the District identifies an adverse impact in its longitudinal analysis, the District may also take the following steps:

1. Review the longitudinal hiring process analyses results for potential adverse impact affecting the identified monitored group at any phase(s) of the hiring process or employment.
2. Conduct additional quantitative analyses of phases where the District identifies adverse impact to determine, where possible, the specific elements of the hiring process or employment stage creating an adverse impact.
3. Review the identified hiring process elements or employment stage contributing to the adverse impact to determine whether they can be modified, eliminated, or replaced with a procedure that can decrease the adverse impact.
4. Consider the implementation of additional measures designed to promote diversity in the hiring process and employment.
5. Analyze retention of monitored group employees in the impacted area and other employment processes that impact the District's ability to attract and retain a diverse workforce.
6. Present any findings to the EEOAC, and other relevant stakeholder groups to identify other potential good faith efforts to make positive progress towards eliminating the adverse impact.

Plan Component 11: Process for Utilizing Data to Determine Whether Monitored Groups are Underrepresented Within District Job Categories

References: CCR, Title 5, §§53003(c)(9), and 53006

In conjunction with EEO Data gathered pursuant to EEO Plan Component 10, the District shall identify and utilize data available from reliable public and private sources to determine whether monitored groups are underrepresented within District job categories, as defined in EEO Plan Component 2.

DATA COLLECTION

The District shall utilize data available from reliable public and private sources, including but not limited to Management Information Systems (MIS), Employee and Employee Assignment Files, California Community College Chancellor Office Data Mart, and data from CCC Registry for this analysis. The projected representation will be based on local available workforce data through various sources including the U.S. Census data and the California Labor Market information. Data collection and analysis will begin at the conclusion of year 1 of the Plan.

ANALYSIS TO IDENTIFY UNDERREPRESENTATION

Once the District gathers the EEO Data described in Component 10 and the data from public and private sources described in this EEO Plan Component and assigns every employee and applicant to one of the seven job categories identified in EEO Plan Component 2, the District will then review the EEO Data of its employees, broken down by number of persons from monitored group status in each job category.

The District will then analyze this employee EEO Data to compare the percent of a monitored group in a job category with their projected representation based on availability in the workforce. Representation below 80% constitutes underrepresentation.

The District will use the following process in analyzing adverse impact and determining whether monitored groups are underrepresented:

1. Comparative analysis of the data to identify any disparities between different groups. This may include comparing the demographic composition of our workforce with the demographics of the relevant labor market or applicant pool.
2. Root cause analysis – if adverse impacts are identified, we will explore the underlying factors contributing to the disparities. This could include examining recruitment procedures, selection criteria, performance evaluations, and other relevant policies and practices.
3. Action Plan – We will develop action plans aimed at mitigating adverse impacts based on our findings. This may include targeted training, revisions to policies and procedures, and increased outreach efforts to monitored groups.
4. Monitoring and Evaluation – We understand that this work is ongoing and requires continuous monitoring and evaluation of our efforts to rectify adverse impacts. Regular reporting and data tracking help us gauge the effectiveness of our strategies and adjust as needed.

Plan Component 12: Methods to Address Any Underrepresentation

Reference: CCR, Title 5, §§53003(c)(10)

Title 5, Section 53003

(c)(10) requires the EEO Plan to identify strategies for addressing any underrepresentation identified pursuant to Section 53003(c)(9) and EEO Plan Component 11. The EEO Officer is responsible for developing appropriate measures for addressing findings of underrepresentation.

The District will review the information gathered pursuant to EEO Plan Component 11 to determine if underrepresentation of a monitored group may be the result of non-job-related factors in the employment process. The information to be reviewed shall include, but need not be limited to:

1. Relevant data gathered pursuant to EEO Plan Component 10, to identify whether the percentage of persons from a monitored group employed by the District in a job category is below eighty percent (80%) of the projected representation for that group and job category; and
2. Analysis of data regarding applicants, which may inform the District's analysis of underrepresentation of a monitored group.

The District will not designate or set aside particular positions to be filled by members of any group defined in terms of race, religious creed, color, national origin, ancestry, physical or mental disability, medical condition, genetic information, marital status, sex, gender, gender identity, gender expression, age, sexual orientation, immigration status, veteran or military status. The District also will not engage in any other practice that would result in discriminatory or preferential treatment prohibited by state or federal law. The District will not apply the EEO Plan in a rigid manner that has the purpose or effect of so discriminating.

In order to address these instances of underrepresentation, as defined above, the District will take the following steps:

1. The District will request that the EEOAC, in conjunction with appropriate Human Resources staff, review the District's recruitment procedures and make recommendations on modifications that would address the underrepresentation.
2. Require the responsible administrator for the division or department where the underrepresentation occurs, in conjunction with the EEO officer, to create a recruitment and hiring action plan to assist in addressing the underrepresentation. The action plan will include action items outlined in plan component 13.
3. Conduct exit interviews with employees who leave the District and maintain a database of exit interviews, so that the District can analyze the data for patterns impacting particular monitored groups.

Plan Component 13: Additional Steps to Remedy Significant Underrepresentation

Reference: CCR, Title 5, §§53003(c)(9)

PRE-HIRING			
Strategy	Responsible Party	Description	Metrics and Review
Provide training to employees, students and trustees	Human Resources EEO Officer or designee.	<p>Y1: Offer EEO/diversity workshops during convocation and classified professional development days.</p> <p>Y2: Provide workshops to employees on successful application and interviewing skills. Outreach to underrepresented employee groups and co-sponsor workshops with employee affinity groups.</p> <p>Y3: Develop mandatory diversity training to provide employees every 2 years.</p>	<p>Track employees who receive training.</p> <p>Evaluation of trainings and workshops. Implement improvements based on feedback.</p>
Establish an EEO & Diversity online presence on the District’s website.	Human Resources EEO Officer or designee.	<p>Y1: Establish an “Equal Employment Opportunity and Diversity” online presence by highlighting the District’s diversity and equal employment opportunity, ADA, sexual harassment and nondiscrimination policies, procedures and programs on the District’s website. The website will also list contact persons for further information on all of these topics.</p> <p>Y2: Create an intranet (inward facing) platform to promote DEIA related trainings via Keenan Safe Colleges and Vision Resource Center for employees.</p>	<p>Provide a resources section on the intranet for screening committees, EEO representatives, and hiring managers.</p> <p>Ensure accessibility of all forms on our website.</p> <p>Track voluntary completion of additional DEIA related trainings.</p>

		Y3: Establish a webpage for all employee affinity groups.	
Establish partnerships with professional organizations in our service area and other educational organizations to help promote job opportunities.	Human Resources/EEO officer or designee.	Y1: Promote our job opportunities through the South County Collaborative group. Y2: Develop a pipeline with other educational institutions to increase diversity in our applicant pools. Y3: Explore posting through different governmental organizations such as One Stop, Work to Future, etc.	Longitudinal review - demonstrated increase in diversity in applicants.
HIRING			
Consistent and ongoing training for hiring committees.	Human Resources/EEO officer, designee or contracted third party for trainings. All screening committee members receive training prior to their service on screening committees.	Y1: Training to all screening committee members prior to their service on any screening committee. Y2: Implementation of mandatory 3-hour EEO training for all campus once every 2 years. Y3: Develop specific training on how to assess an applicant's DEIA skill set and an updated rating sheet. Y3: Establish a sustainable method for providing compensation to part-time faculty and student representatives to serve on hiring committees.	Tracking and enforcement of required training in order to serve on screening committees.
Convey in job announcements the	Human Resources/EEO officer, or designee	Y1: Establish an "Equal Employment Opportunity and Diversity" online presence by	Survey applicants on whether language attracted them to the position.

<p>district's commitment to diversity & EEO.</p>		<p>highlighting the District's diversity and equal employment opportunity, ADA, sexual harassment and nondiscrimination policies, procedures and programs on the District's website. The website will also list contact persons for further information on all of these topics. List this website on job announcements.</p> <p>Y2: Update the non-discrimination statement on job announcements.</p> <p>Y3: Emphasize the district's commitment to DEIA and equal employment opportunity in all job announcements.</p>	<p>Increased diversity in applicant pools.</p>
<p>Maintain updated job descriptions and job announcements.</p>	<p>Human Resources/EEO officer, or designee.</p>	<p>Y1: Re-create any job descriptions lost during the malware incident.</p> <p>Y2: Recognize multilingualism and cultural humility as a desired qualification, and when appropriate, add as a required skill and qualification for specific positions.</p> <p>Y3: Review structure of job description and redesign format to be more attractive and easier to read for applicants.</p>	<p>All job descriptions available via website.</p> <p>Expand desirable skills, leading to more diverse applicant pools.</p>
<p>POST-HIRING</p>			
<p>Conduct exit interviews & use this information.</p>	<p>Human Resources/EEO officer, or designee.</p>	<p>Y1: Meet with exiting employees and encourage the submittal of feedback to create a more equitable work environment. Create an</p>	<p>Increased number of exit interviews received by HR.</p>

		<p>electronic format for ease of submittal of this information.</p> <p>Y2: Collect and track data received and review with cabinet as appropriate.</p> <p>Y3: Implement changes to campus structure, based on feedback. Provide additional training to management, as needed based on feedback.</p>	<p>Establishment of local changes based on feedback received.</p> <p>Management training plan developed based on feedback received through the exit interview process.</p>
<p>Professional development, mentoring, support and leadership opportunities for new employees.</p>	<p>Human Resources/EEO officer, or designee.</p>	<p>Y1: Implementation of culturally responsive teaching training for faculty.</p> <p>Y2: Implementation of equity series workshops tailored to new employees as part of their onboarding process.</p> <p>Y3: Establish a "buddy" system for new employees to connect with existing employees as part of the onboarding process.</p>	<p>Tracking of employees who complete training series.</p> <p>Establishment and evaluation of coaching/buddy program.</p> <p>Surveying new employees for feedback on onboarding.</p> <p>Retention of new employees.</p>
<p>Sponsor cultural events and speakers on diversity.</p>	<p>Human Resources/EEO officer, or designee.</p>	<p>Y1: Establishment of affinity groups on campus to promote campus wide cultural humility.</p> <p>Y2: Equity series implementation to provide DEIA focused onboarding to new employees.</p> <p>Y3: Incorporate speakers/workshops related to DEIA in convocation day.</p>	<p>Expand campus wide understanding of impact and importance of diversity, equity and inclusion.</p> <p>Tracking attendance at DEIA related events.</p>

