PLAN

INTRODUCTION

Lennor Johnson (Nov 16, 2022 16:03 PST)



DEFINITIONS

The following definitions have been defined under the California Code of Regulations, Title 5, §53001, best practices and District policies and procedures.

(a) Adverse Impact. "Adverse impact" means that a statistical measure (such as those outlined in the Equal Employment Opportunity Commission's "Uniform Guidelines on Employee Selection Procedures") is applied to the effects of a selection procedure and demonstrates a disproportionate negative impact on any group protected from discrimination pursuant to Government Code section 12940. A disparity identified

- (i) Job Category. Used for the purpose of this Plan and reported to the Chancellor pursuant to title 5, Section 53004(a) are (1) executive/administrative/managerial; (2) faculty and other instructional staff; (3) professional non-faculty; (4) secretarial/clerical; (5) technical and paraprofessional; (6) skilled crafts; (7) service and maintenance.
- (*j*) **In-house or Promotional Only Hiring**. "In-house or promotional only" hiring means that only existing district employees are allowed to apply for a position.
- (*k*) Monitored Group. "Monitored group" means those groups identified in section 53004(b) for which monitoring, and reporting is required pursuant to section 53004(a).
- (1) OCR. An acronym for the Office for Civil Rights of the United States Department of Education.
- (m) 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

EEO POLICY STATEMENT

Board Policy 3420 Equal Employment Opportunity

References: Education Code, Sections 87100 et seq. title 5, Sections 53000 et seq.

Revised February 20, 2019

The Board supports the intent set forth by the California Legislature to assure that effort is made to build a community in which opportunity is

PLAN Component

DELEGATION OF RESPONSIBILITY, AUTHORITY, AND COMPLIANCE

Achieving the goal of a diverse educational culture requires the collective efforts of the college community. All employees and agents of the District are responsible for promoting and supporting equal employment opportunity in order to realize the full benefits of a diverse, collaborative, and inclusive District culture. The general responsibilities for the prompt and effective implementation of this Plan are set forth below.

BOARD OF TRUSTEES

The Board of Trustees is ultimately responsible for proper implementation of the district's Plan at all levels of district and college operation, and for ensuring equal employment opportunity as described in the Plan.

SUPERINTENDENT/PRESIDENT

The Board of Trustees delegates to the Superintendent/President the responsibility for ongoing implementation of the Plan and for providing leadership in supporting the District's equal employment opportunity policies and procedures. The Superintendent/President shall advise the Board of Trustees concerning statewide policy emanating from the Board of Governors of the California Community Colleges and direct the publication of an annual report on Plan implementation. The Superintendent/President shall evaluate the performance of all administrative staff who report directly to him/her on their



EEO ADVISORY COMMITTEE

The District has established an Equal Employment Opportunity Advisory Committee ("EEOAC") to assist in the articulation and implementation of the Plan. The EEOAC assists the District in achieving understanding of and support equal employment opportunity and non-discrimination policies and procedures consistent with the purposes of the Plan.

PLAN COMPONENT SIX UNLAWFUL DISCRIMINATION AND SEXUAL

regardless of whether such complaints also include allegations of equal employment opportunity violations. The District has adopted policies and procedures for complaints alleging unlawful discrimination or harassment, which are included in **Appendix A**.

Student Complaint Procedure. A student who feels he/she has a been or is being subjected to discriminatory treatment, including harassment, or who has learned of such unlawful discrimination in his or her official capacity, should immediately contact the office of the vice president of student services, Title IX coordinator or deputy coordinator, or CHRO. The District's Student complaint process can be found in the current College Catalog and AP3435.

Appeal(s) to the District's Governing Board. After the district issues the complainant the administrative determination, if the complainant is not satisfied with the result, they may submit a written appeal to the district's governing board within thirty (30) days from the date of the administrative determination. The district governing board must review the matter and issue a final district decision within forty-five (45) days of receiving the appeal.

Appeals(s) to the Chancellor. In cases not involving employment discrimination, if the complainant is not satisfied with the district governing board's final decision in the matter, the complainant may file an appeal with the Chancellor's Office. Appeals to the Chancellor's Office must be filed within thirty (30) days from the date of the district governing board's final decision, must be in writing, and submitted via email to <u>legalaffairs@cccco.edu</u> or in hard copy to:

PLAN Component Seven

NOTIFICATION TO DISTRICT EMPLOYEES

The commitment of the Board of Trustees and the Superintendent/President to equal employment opportunity and diversity is emphasized through the broad dissemination of its Equal Employment Opportunity and Diversity Policy Statement and the Plan. The policy statement will be included in the college catalogs and class schedules. The Plan and subsequent revisions will be distributed to the District's Board of Trustees, the Superintendent/President,







ANALYSIS OF WORKFORCE AND APPLICANTS

The Human Resources Department will annually collect the District's employee demographic data and shall monitor applicants for employment on an ongoing basis to evaluate the District's progress in implementing the Plan to provide data needed for the reports required by this Plan. Monitored groups are men, women, American Indians/Alaskan Natives, Asians or Pacific Islanders, Black/African Americans, Hispanics/Latinos, Caucasians, and person with disabilities.

For data collection and reporting purposes, each applicant or employee will be afforded the opportunity to voluntarily identify her/his/their gender, ethnic group identification and, if applicable, disability. Persons may designate as many ethnicities as they identify with but shall be counted in only one ethnic group for reporting purposes. This information will be kept confidential and will be separated from the applications that are forwarded to the screening committee and hiring administrator(s).

The District will annually report to the Chancellor the results of its annual survey of employees. At least every three (3) years, the Plan will be reviewed and, if necessary, revised based on analysis of the ethnic group identification, gender, and disability composition of existing staff and of those who applied for employment in each of the following identified job categories:

- 1) Executive/Administrative/Managerial
- 2) Faculty
- 3) Professional Non-faculty
- 4) Secretarial/Clerical
- 5) Technical and Paraprofessional
- 6) Skilled Crafts
- 7) Service and Maintenance

Analysis of District Workforce. The District's demographic data for permanent employees as of Fall 2021 is presented on page 21. For purposes of analyzing this data longitudinally, demographic data from Fall 2017 and 2018 is also presented.

To assist with the analysis and required reporting, the District collected data based on the following defined terms:

Gender Identification. The District requested employees to self-identify as female, male or non-binary.

Race and Ethnicity Identification. The District requested that employees self-identify into the following ethnicity categories.

- 1) **Hispanic or Latino** A person of Cuban, Mexican, Puerto Rican, South or Central American or other Spanish culture or origin regardless of race.
- 2) White/Caucasian (Not Hispanic or Latino) A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.
- 3) **Black/African American (Not Hispanic or Latino)** A person having origins in any of the black racial groups of Africa.
- 4) Asian or Other Pacific Islander (Not Hispanic or Latino) Persons having origins in any of the original peoples of the Far East, Southeast Asian, the Indian subcontinent, or the Pacific Islands. This category

includes, for example, persons of Chinese, Japanese, Filipino, Korean, Vietnamese, Asian Indian, Hawaiian, Guamanian, Samoan, Laotian, and Cambodian decent.

5) American Indian or Alaskan Native (Not Hispanic or Latino) -

Faculty full-time has also demonstrated similar consistent trends as the prior group with females ranging from 44% to 51% and males from 49% to roughly 54% over a three-year period. Similarly, part-time faculty shows females ranging from 42% to 52% and males from 47% to 57% over a three-year period.

Finally, classified employees show a more significant difference within gender with females comprising approximately 62% of the total population within a three-year period and males at approximately 37%. This is an area that is noted as a targeted area for recruitment purposes.

It should be noted that the non-binary group has been established as a separate gender based on the State's Data Mart information.

Race & Ethnicity

Overlaying the data analysis are the changes that have been embedded within the data collection system(s). Since the last three-year EEO Plan, the groups of Filipino and Pacific Islander have been separated from Asian to

Student Demographic Analysis

The student demographics show that the Hispanic/Latino group is the majority group comprising slightly over 90% of the total student population over the past three (3) years. The largest group based on gender has been consistently female which has ranged from approximately 56% to 58% within the same three (3) year period.

The second largest group based on race/ethnicity is the White/Caucasian group at 360 students, which is 4.5% of the total student population. The smaller groups consist of Other/Unknown at 2.4%, Black/African American at 1.1% and the remaining groups of Non-Binary, American Indian/Alaskan Native, Asian, Pacific Islander, Filipino, two (2) or more races are all less than 1%.

In relationship to employee data, the Hispanic/Latino group is the largest for both classified (86%) and part-time faculty (69.7%), but is the second largest group for full-time faculty, consisting of 40% of the population. The largest group for full-time faculty is White/Caucasian at 46.1% and the Hispanic/Latino group is at 40%. While there is a comparable balance between the two (2) groups, there is a significant gap between the student population at roughly 90% Hispanic/Latino and the 40% of full-time faculty, although the part-time faculty does consist of more than half of the entire job category. Nonetheless, it is noted that the White/Caucasian student population consists of 4.5% of the student body but represent the majority of the full-time faculty population at 46.1%. The latter is an area that will be targeted for strategic recruitment purposes both externally and within the part-time faculty ranks.

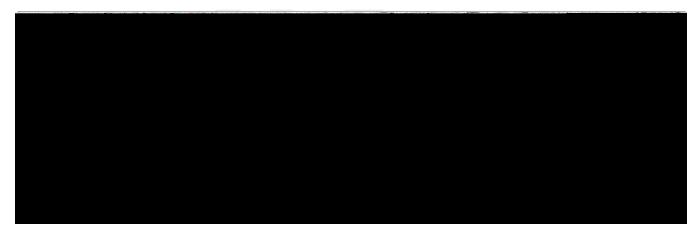


Table 3. Significant Underrepresentation Analysis – Projected vs. Actual Representation Race/Ethnicity²

¹ Reported as Asian/Pacific Islander and Filipino for 2019 and 2020. Groups separated in 2021 data per Data Mart Reporting.

² August 12, 2021, US Census Bureau data

Significantly Underrepresentation Group Analysis

In review of the various job categories, the District is charged with comparing the percentage of individuals form a monitored group in a job category with the District's projected representation for the same group. The projected representation can be based on one (1) or more factors including the following:

- Student demographics at the College or District
- Community demographics in the District's service area

However, this percentage should be measured with gender and racial/ethnic group data within job categories to assess hiring practices in certain areas. For example, the faculty, full-time has a higher percentage of White/Caucasian employees but the classified group shows a lower number of selection. Therefore, adverse impact may be occurring within job categories and should not be just assessed in totality.

Similarly, but to a larger extent, when comparing the selection and hiring rate for the Black/African American group, it shows 50% selection and for the Asian population a 33% selection rate. An applicant pool that is less than 2% of the overall applicant pool may render statistical error(s), but groups are not discounted due to smaller sizes and should be monitored over time to determine selection rates and ensure hiring practices are not unintentionally excluding them due to the larger group sizes. For this reason, the District will address goals and strategies to address the groups that are falling below the 2% threshold to ensure monitoring and recruitment efforts are addressing these groups.

Table 6. 4-Year Longitudinal Analysis of Applicant Pool by Employee Group

Islander/Native Hawaiian and ⁷Filipino groups. While the Black/African American has remained relatively stable, further efforts to address growth will be identified by the District particularly for the job category of classified.

Finally, the White/Caucasian group has remained consistent as well, within the 20% range. This percentage is both

UNDERREPRESENTATION ANALYSIS

Race and Ethnicity Analysis

For race and ethnicity, the



- c) through training, assist committee to develop interview questions that do not have a disparate impact on particular groups.
- d) assist

- 6. Provide training on basic diversity awareness that emphasizes importance of diversity and cultural competence in hiring.
- 7. Campus venues and platforms n diversity to be presented to faculty, staff, administration, and the Governing Board.

PLAN COMPONENT 13

IMPLEMENTATION OF EEO STRATEGIES

As described in Plan Component 12, the District has set forth various strategies for furthering its efforts to diversify the workforce. These efforts are also demonstrated within its **Nine (9) Multiple Methods**, as presented within the matrix below:

MM#	Multiple Methods	CCR Title 5, Regulations	Regulation
I	Submission of EEO Plan	Section 53003(a)	The governing

		Advisory Committee for year 2021 The EEO Plan was approved by the Board of Trustees on (pending May 18, 2022 Board
		Meeting)
Submission of Expenditure/Perform ance Reports	Section 53034	Districts shall submit a report on the use of Equal Employment

Γ

Section	The district addresses issues of inclusion/exclusion in a transparentand
53024.1(o)	collaborative fashion.

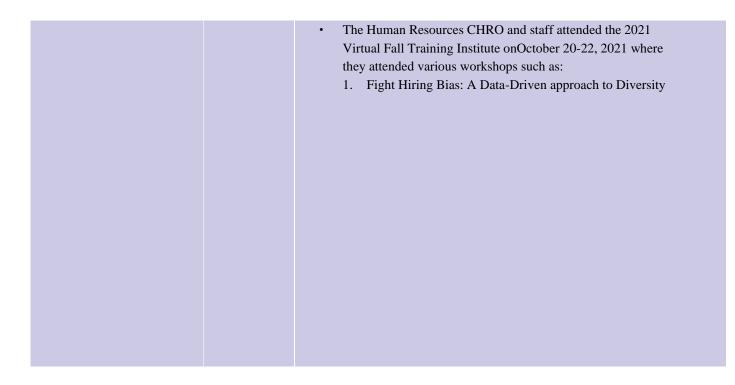
Completed:

• On April 21, 2021, the District adopted Resolution No.19613 in support of the California Community College Board of Governor's Adoption of the month

		Section 53024.1(k)	The district's mission statement conveys its commitment to diversity and inclusion, and recognition that a diverse and inclusive workforce promotes its educational goals and values.
			Completed:
			 The diversity of applicants who disclose their race, ethnicity, and/or gender is monitored and evaluated to ensure recruitment efforts are reaching a diverse pool of applicants. If a pool appears to lack diversity, Human Resources, the department, and administration determinewhether to extend with additional advertising, or repost the position entirely in search of a diverse applicant pool.
V	Procedures for addressingdiversity throughout hiring steps and levels	Section 53024.1(b)	The district conducts exit interviews with employees who voluntaryleave the district, maintains a data base

Prior to aposting closing date, the Human Resources Analyst assigned to facilitate the screening process with the collaboration of the CHRO, evaluates the applicant pool to determine if the posting deadline should be extended in support of increasing the size and/or diversity of a total applicant pool.

• For all non-faculty positions, the assigned Human Resources Analyst completes the minimum qualifications screening of the approved total applicant pool. For faculty positions, the screening and selection committee completes the minimum qualifications screening of the approved total applicant pool.



			Development Training;Professional Development Plan Cornerstone (VRC); Teaching & Learning Center (TLC)
		Section 53024.1(i)	The district timely complies with the requirements of GovernmentCode section 12950.1 (Stats. 2004, ch. 933 [AB 1825]), and includesall forms of harassment and discrimination in the training.
			• The District provides regular training to all management, faculty, and classified personnel throughout the District on the Prevention of Sexual Harassment in the workplace. They arerequired to participate in this training at least every 2 years.
		Section 53024.1(m)	 District staff members serve as resources, consultants, mentors and/or leaders to colleagues at other districts in the areas of EEO anddiversity enhancement. Completed: The CHRO is currently serving on the ACHRO Board and Region 10 DEI Task Force which is reshaping our recruitment and interviewing process to include DEI and to remove barriers such asunconscious bias.
VIII	Diversity incorporated into criteria for employee evaluation and tenure review	Section 53024.1(b)	The district conducts exit interviews with employees who voluntary

 Within the Faculty Standards listed in the Collective Bargaining Agreement with the California Teacher Association for Academic Years 2018-2021, there is a standard listed that can be usedfor the employee evaluation and tenure review that states that one area to be considered in the evaluation of faculty is in "Demonstrating rapport building efforts (e.g., Nonverbal behaviors, greeting students,

well as expand their skillsets.
• The Faculty Teaching & Learning Center (TLC)
revamped their website making it easier to searchfor
professional development trainings and seminars, as well
as to request funding.
EVIDENCE: IVC Leadership Academy; Teaching & Learning Center (TLC)

APPENDICES

4-YEAR LONGITUDINAL CHART: APPLICANT POOL

IMPERIAL COMMUNITY COLLEGE EEO PLAN 2022-25



APPENDIX II. 2021 GENDER DATA

APPENDIX III. 3-YEAR LONGITUDINAL DATA: STUDENT DEMOGRAPHICS

3-YEAR LONGITUDINAL DATA STUDENT DEMOCRAPHICS

IMPERIAL COMMUNITY COLLEGE EEO PLAN 2022-25