



WEST HILLS
COMMUNITY COLLEGE DISTRICT

Equal Employment Opportunity Plan (EEO)

2019-2022

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I. Introduction

The West Hills Community College District's Equal Employment Opportunity Plan (*Plan*) was adopted by the governing board on April 21, 2020. It is the district's belief that taking active and vigorous steps to ensure equal employment opportunity and creating a working and academic environment, which is welcoming to all, will foster diversity and promote excellence. The *Plan* will reflect the district's commitment to equal employment opportunity.

The district fosters a climate of acceptance with the inclusion of faculty and staff from diverse backgrounds. Diversity in the academic environment fosters cultural awareness and responsiveness, mutual understanding and respect. The Board of Trustees commits itself to promote the realization of equal employment through a continuing equal employment opportunity program. The *Plan's* immediate focus is equal employment opportunity in its recruitment and hiring policies and practices pursuant to the applicable title 5 regulations (section 53000 et seq.) and the steps the district shall take in the event of underrepresentation of monitored groups.

The *Plan* contains an analysis of the demographic makeup of the district's workforce population, along with the requirements to be in compliance with title 5. The *Plan* also includes the requirements for a complaint procedure for noncompliance with the title 5 provisions relating to equal employment opportunity programs; complaint procedures in instances of unlawful discrimination; establishment of an Equal Employment Opportunity Advisory Committee; methods to support equal employment opportunity and an environment which is welcoming to all; and procedures for dissemination of the *Plan*. To properly serve a growing diverse population, the district will endeavor to hire and retain faculty and staff who are sensitive to, and knowledgeable of, the needs of the continually changing student body it serves.

Dr. Stuart Van Horn
Chancellor

II. Definitions

- a) *Adverse Impact:* a statistical measure (such as those outlined in the EEO 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 in a given selection process will not be considered to constitute adverse impact if the numbers involved are too small to permit a meaningful comparison.
- b) *Diversity:* means a condition of broad inclusion in an employment environment that offers equal opportunity for all persons. It requires both the presence, and the respectful treatment, of individuals from a wide range of ethnic, racial, age, national origin, religious, gender, sexual orientation, disability and socioeconomic backgrounds.
- c) *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 the seven categories which include executive/administrative/managerial, faculty and other instructional staff, professional non faculty, secretarial/clerical, technical and paraprofessional, skilled crafts, and service and maintenance. Equal employment opportunity also involves:
 - (1) identifying and eliminating barriers to employment that are not job related; and
 - (2) creating an environment that fosters cooperation, acceptance, democracy, and free expression of ideas and that is welcoming to men and women, persons with disabilities, and individuals from all ethnic and other groups protected from discrimination pursuant to Government Code section 12940.
- d) *Equal Employment Opportunity Plan:* An "equal employment opportunity plan" is a written document in which a district's workforce is analyzed and specific plans and procedures are set forth for ensuring equal employment opportunity.
- e) *Equal Employment Opportunity Programs:* all the various methods by which equal employment opportunity is ensured. Such methods include, but are not limited to, using nondiscriminatory employment practices, actively recruiting, monitoring and taking additional steps consistent with the requirements of section 53006.
- f) *Ethnic Group Identification:* means an individual's identification in one or more of the ethnic groups reported to the Chancellor pursuant to section 53004. These groups shall be more specifically defined by the Chancellor consistent with state and federal law.
- g) *In-house or Promotional Only Hiring:* means that only existing district employees are allowed to apply for a position.

- h) *Monitored Group*: means those groups identified in section 53004(b) for which monitoring and reporting is required pursuant to section 53004(a).
- i) *Person with a Disability*: 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.
- j) *Reasonable Accommodation*: the efforts made on the part of the district in compliance with Government Code section 12926.
- k) *Screening or Selection Procedures*: 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 but not limited to traditional paper and pencil tests, performance tests, and physical, educational, and work experience requirements, interviews, and review of application forms.
- l) *Significantly Underrepresented Group*: any monitored group for which the percentage of persons from that group employed by the district in any job category listed in section 53004(a) is below eighty percent (80%) of the projected representation for that group in the job category in question.

III. Policy Statement

West Hills Community College District is committed to the principles of equal employment opportunity and will implement a comprehensive program to put those principles into practice. It is the district's policy to ensure that all qualified applicants for employment and employees have full and equal access to employment opportunities within the district and are not subjected to discrimination in any program or activity of the district on the basis of national origin, religion, age, gender, gender identity, gender expression, race or ethnicity, color, medical condition, genetic information, ancestry, sexual orientation, marital status, physical or mental disability, pregnancy, or because he/she is perceived to have one or more of the foregoing characteristics, or based on association with a person or group with one or more of these actual or perceived characteristics.

The district will strive to achieve a workforce that is welcoming to men, women, persons with disabilities and individuals from all ethnic and other groups to ensure the district provides an inclusive educational and employment environment. Such an environment fosters cooperation, acceptance, democracy and free expression of ideas. An Equal Employment Opportunity Plan will be maintained to ensure the implementation of equal employment opportunity principles that conform to federal and state laws.

IV. Delegation of Responsibility, Authority and Compliance

It is the goal of the West Hills Community College District that all employees promote and support equal employment opportunity. Equal employment opportunity requires a commitment and a contribution from every segment of the district. The general responsibilities for the prompt and effective implementation of this *Plan* are set forth below.

1. *Governing Board*

The governing board 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*.

2. *Chancellor*

The governing board delegates to the Chancellor the responsibility for ongoing implementation of the *Plan* and for providing leadership in supporting the district's equal employment opportunity policies and procedures. The Chancellor shall advise the governing board 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 Chancellor shall evaluate the performance of all administrative staff who report directly to him/her on their ability to follow and implement the *Plan*.

3. *Equal Employment Opportunity Officer*

The district has designated the Director of Human Resources as its equal employment opportunity officer who is responsible for the day-to-day implementation of the *Plan*. If the designation of the equal employment opportunity officer changes before this *Plan* is next revised, the district will notify employees and applicants for employment of the new designee. The equal employment opportunity officer is responsible for administering, implementing and monitoring the *Plan* and for assuring compliance with the requirements of title 5, sections 53000 et seq. The equal employment opportunity officer is also responsible for receiving complaints described in Plan Component 6 and for ensuring that applicant pools and selection procedures are properly monitored.

4. *Equal Employment Opportunity Advisory Committee*

Each college will establish an Equal Employment Opportunity Advisory Committee to act as an advisory body to the equal employment opportunity officer and the district as a whole to promote understanding and support of equal employment opportunity policies and procedures. The Equal Employment Opportunity Advisory Committees shall assist in the implementation of the *Plan* in conformance with state and federal regulations and guidelines, monitor equal employment opportunity progress, and provide suggestions for *Plan* revisions as appropriate.

5. *Agents of the District*

Any organization or individual, whether or not an employee of the district, who acts on behalf of the governing board with regard to the recruitment and screening of personnel, is an agent of the District and is subject to all the requirements of this *Plan*.

6. *Good Faith Effort*

The district shall make a continuous good faith effort to comply with all the requirements of its *Plan*.

V. Advisory Committee

The district has established an Equal Employment Opportunity Advisory Committee to assist the district in implementing its *Plan*. The committee may also assist in promoting an understanding and support of equal opportunity and nondiscrimination policies and procedures. The committee may sponsor events, training, or other activities that promote equal employment opportunity, nondiscrimination, retention and diversity. The equal employment opportunity officer shall train the advisory committee on equal employment compliance and the *Plan* itself. The committee shall include a diverse membership whenever possible. A substantial good faith effort to maintain a diverse membership is expected. If the district has been unable to meet this requirement, it will document that efforts were made to recruit advisory committee members who are members of monitored groups. The equal employment opportunity officer will chair the committee. The Equal Employment Opportunity Advisory Committee shall hold a minimum of four (4) meetings per fiscal year, with additional meetings if needed to review EEO and diversity efforts, programs, policies, and progress. When appropriate, the advisory committee shall make recommendations to the governing board, the Chancellor, and the equal employment opportunity officer.

The advisory committee shall be trained in all of the following:

- (a) The requirements of 53005 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 advisory committee in carrying out the District's EEO Plan.

VI. Complaints

1. *Complaints Alleging Violation of the Equal Employment Opportunity Regulations (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. Any person who believes that the equal employment opportunity regulations have been violated may file a written complaint describing in detail the alleged violation. All complaints shall be signed and dated by the complainant and shall 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. 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. Complaints alleging violations of the *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 he/she 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. (See *California Community Colleges Chancellor's Office Guidelines for Minimum Conditions Complaints* at:

https://www.cccco.edu/-/media/CCCCO-Website/Files/General-Counsel/x_min-cond-complaints-ada.pdf?la=en&hash=2E1C15D0383C936DAFA138F15B5007BDEC9551FE

The district may return without action any complaints that are inadequate 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.

The complaint shall be filed with the equal employment opportunity officer. If the complaint involves the equal employment opportunity officer, the complaint may be filed with the Chancellor. To the extent practicable, a written determination on all accepted written complaints will be issued to the complainant within ninety (90) days of the filing of the complaint. The equal employment opportunity officer will forward copies of all written complaints to the Chancellor's Office upon receipt.

In the event that a complaint filed under section 53026 alleges unlawful discrimination, it will be processed according to the requirements of section 59300 et seq.

2. *Complaints Alleging Unlawful Discrimination or Harassment (Section 59300 et seq.)* The district has adopted procedures for complaints alleging unlawful discrimination or harassment. The Director of Human Resources is responsible for receiving such complaints and for coordinating their investigation. Campus complaint officers may be

assigned investigation responsibilities. The district's discrimination and sexual harassment complaint procedures are included within this section of this *Plan*.

For the complete policy and procedure, please click on the links below.

Board Policy 3410: Nondiscrimination

[Board Policy](#)
[Administrative Procedure](#)

The West Hills Community College District is committed to equal opportunity in educational programs, employment and access to all appropriate programs and activities. The district and its employees shall provide access to all of its services regardless of national origin, religion, age, gender, race, color, medical condition, ancestry, sexual orientation, marital status, physical or mental disability or because he or she is perceived to have one or more of the foregoing characteristics.

Board Policy 3430: Prohibition of Harassment

[Board Policy](#)
[Administrative Procedure](#)

The District is committed to providing an academic and work environment that respects the dignity of individuals or groups. West Hills Community College District remains free of sexual harassment and all forms of sexual intimidation and exploitation. It is also free of other unlawful harassment, including that which may be based on any of the following statuses: race, religious creed, color, national origin, ancestry, physical disability, mental disability, medical condition, marital status, gender, age, or sexual orientation of any person because he or she is perceived to have one or more of the foregoing characteristics.

Administrative Procedure 3435: Discrimination and Harassment Investigations

[Administrative Procedure](#)

The District strongly encourages employees and students who believe they have been subject to harassment and/or discrimination to file a complaint as soon as possible. All employees, vendors, volunteers and students, as a condition of participation, employment or study, have a mandatory duty to report incidents of harassment and discrimination; the existence of a hostile, offensive or intimidating work environment and all acts of retaliation.

VII. Notification to District Employees

The commitment of the governing board and the Chancellor to equal employment opportunity is emphasized through the broad dissemination of its Equal Employment Opportunity Policy Statement and the *Plan*. The policy statement will be printed in the college catalogs and class schedules. The *Plan* and subsequent revisions will be distributed to the district's governing board, the chancellor, administrators, the academic senate leadership, union representatives and members of the District Equal Employment Opportunity Advisory Committees. The *Plan* will be available on the district's website, and when appropriate, may be distributed by e-mail. Each year, the district office will provide all employees with a copy of the board's Equal Employment Opportunity Policy Statement (located in section III of this *Plan*) and written notice summarizing the provisions of the district's Equal Employment Opportunity Plan. The Human Resources Department will provide all new employees with a copy of the written notice described above when they commence their employment with the district. The annual notice will contain the following provisions:

- 1) The importance of the employee's participation and responsibility in ensuring the *Plan*'s implementation.
- 2) Notice of location where copies of the plan can be found including every campus library, on the campus and district website, the Office of the Chancellor and the Human Resources Department.

VIII. Training for Screening/Selection Committees

Any organization or individual, whether or not an employee of the district, who is involved in the recruitment and screening/selection of personnel shall receive appropriate training on the requirements of the title 5 regulations on equal employment opportunity (section 53000 et. seq.); the requirements of federal and state nondiscrimination laws; the requirements of the district's Equal Employment Opportunity Plan; the district's policies on nondiscrimination, recruitment, and hiring; principles of diversity and cultural proficiency; the value of a diverse workforce; and recognizing bias. Persons serving in the above capacities will be required to receive training within the 12 months prior to service. This training is mandatory; individuals who have not received this training will not be allowed to serve on screening/selection committees. The Human Resources Department is responsible for providing the required training. Any individual, whether or not an employee of the district, acting on behalf of the district with regard to recruitment and screening of employees is subject to the equal employment opportunity requirements of title 5 and the district's Equal Employment Opportunity Plan.

West Hills Community College District has developed an online training presentation through SafeColleges. Employees assigned to serve on a committee are required to go through the training before they can serve on a committee. Training is also held during staff development day.

IX. Annual Written Notice to Community Organizations

The equal employment opportunity officer will provide annual written notice to appropriate community-based and professional organizations concerning the *Plan*. The notice will inform these organizations that they may obtain a copy of the *Plan*, and shall solicit their assistance in identifying diverse qualified candidates. The notice will include a summary of the *Plan*. The notice will also include the internet address where the district advertises its job openings and the names, departments and phone numbers of individuals 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. This list may be revised from time to time as necessary.

X. Analysis of District Workforce and Applicant Pool

The Human Resources Department will annually survey the district's workforce composition 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* and to determine whether any monitored group is underrepresented. Monitored groups are men, women, American Indians/Alaskan Natives, Asians or Pacific Islanders, Blacks/African-Americans, Hispanics/Latinos, Caucasians, and persons with disabilities.

For purposes of the survey and report each applicant or employee will be afforded the opportunity to *voluntarily* identify her or his gender, ethnic group identification and, if applicable, her or his 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/selection committee and hiring administrator(s). This survey will be done for each college in the district. The district will annually report to the Chancellor the results of its annual survey of employees. At least every three years the *Plan* will be reviewed and, if necessary, revised based on an analysis of the ethnic group identification, gender, and disability composition of existing staff and of those who have applied for employment in each of the following identified job categories:

- 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

For comparison, the district's workforce for fall of 2014 and 2018 is listed below. Fall 2014 was used for this analysis as this was the term used in the previous EEO plan.

**West Hills Community College District
Workforce Analysis
Fall 2014**

	Total	Male	Female	Decline to State Gender	American Indian/Alaskan Native	Asian/Pacific Islander	African-American	Hispanic/Latino	Caucasian	Decline to State Ethnicity	Disability
Executive/Admin/Managerial	57	28	29	0	1	1	2	21	32	0	0
Faculty/Other Instructional Staff	73	41	32	0	1	4	1	6	60	1	0
Professional Non-Faculty	47	44	3	0	0	2	0	40	5	0	0
Secretarial/Clerical	45	43	2	0	0	2	2	19	20	2	0
Technical & Paraprofessional	131	15	116	0	0	3	4	97	24	3	0
Skilled Crafts	12	2	10	0	0	0	1	9	2	0	0
Service & Maintenance	40	25	15	0	0	1	1	27	9	2	0
Adjunct Faculty	178	79	99	0	2	2	8	34	123	9	0
TOTALS	583	277	306	0	4	15	19	253	275	17	0

**West Hills Community College District
Workforce Analysis
Fall 2018**

	Total	Male	Female	Decline to State Gender	American Indian/Alaskan Native	Asian/Pacific Islander	African-American	Hispanic/Latino	Caucasian	Decline to State Ethnicity	Disability
Executive/Admin/Managerial	67	30	37	0	1	1	1	29	30	5	0
Faculty/Other Instructional Staff	85	45	40	0	0	3	3	10	68	1	0
Professional Non-Faculty	16	2	14	0	0	0	1	8	6	1	0
Secretarial/Clerical	58	2	56	0	0	1	3	31	21	1	0
Technical & Paraprofessional	175	15	160	0	0	2	5	138	30	0	0
Skilled Crafts	8	1	7	0	0	0	1	6	1	0	0
Service & Maintenance	45	31	14	0	0	1	1	29	12	2	0
Adjunct Faculty	230	120	110	0	1	9	16	50	141	13	0
TOTALS	684	246	438	0	2	17	31	301	309	23	0

Workforce Analysis

With the exception of a few of the monitored groups, there was an increase in overall applications received as follows:

Monitored Group	Increase/Decrease
American Indian/Alaskan Native	Decrease of 50%
Asian/Pacific Islander	Increase of 13%
African-American	Increase of 63%
Hispanic/Latino	Increase of 19%
Caucasian	Increase of 12%
Decline to State	Increase of 35%

In terms of gender, over 50% of our regular personnel are female. This can be attributed to the child development center, which is the largest department in the district and has over 100 female employees at this time. Our workforce is primarily Hispanic and Caucasian which represents are current student and community population.

Applicant

The applicant pools from 2015-16 and 2016-17 were compared in order to analyze the applicant demographics. These pools include applications from all categories including adjunct faculty and temporary, short-term employees. During this time, there was a 31% increase in applications received by the district.

In terms of gender, there was a 54% increase in female applicants and an 82% increase in male applicants. In both 2015-16 and 2016-17 applicants tend to be primarily female. It is also important to note that the number of applicants declining to disclose gender has decreased.

In reviewing the data, this seems to be attributed to the multiple recruitments in the Child Development Center, After School Program and other temporary clerical assignments. Applicants for these positions tend to be female. Many of these short-term positions are filled with students. Currently, our student population is 57% female.

The District will continue its efforts in recruiting and retaining a diverse staff.

The tables below will show an analysis of applicant pools from 2015-16 compared to 2016-17.

Analysis of Applicant Pools

West Hills Community College District 2015-16

	Total	Male	Female	Decline to State Gender	American Indian/Alaskan Native	Asian/Pacific Islander	African-American	Hispanic/Latino	Caucasian	Decline to State Ethnicity	Disability
Executive/Admin/Managerial	365	126	121	118	10	15	83	94	155	8	0
Faculty/Other Instructional Staff*	989	346	430	213	31	82	137	233	441	65	0
Professional Non-Faculty	41	15	12	14	0	2	7	8	24	0	0
Secretarial/Clerical	760	112	452	196	11	49	47	345	229	34	0
Technical & Paraprofessional	361	51	180	130	1	7	54	206	86	7	0
Service & Maintenance	219	133	83	3	0	9	15	138	52	5	0
Other	1460	391	900	169	19	92	86	841	376	46	0
TOTALS	4195	1174	2178	843	72	256	429	1865	1363	125	0

West Hills Community College District 2016-17

	Total	Male	Female	Decline to State Gender	American Indian/Alaskan Native	Asian/Pacific Islander	African-American	Hispanic/Latino	Caucasian	Decline to State Ethnicity	Disability
Executive/Admin/Managerial	546	370	176	0	16	37	114	112	243	24	0
Faculty/Other Instructional Staff*	1382	654	728	0	34	111	207	328	612	90	0
Professional Non-Faculty	38	21	17	0	0	11	7	6	14	0	0
Secretarial/Clerical	578	114	464	0	3	37	64	261	200	13	0
Technical & Paraprofessional	631	175	456	0	12	37	72	344	156	20	0
Service & Maintenance	463	259	204	0	4	19	35	268	123	14	0
Other	1863	544	1319	0	20	97	117	1051	514	64	0
TOTALS	5501	2137	3363	0	89	349	616	2370	1862	225	0

XI. Methods to Address Underrepresentation

The district will ensure equal employment opportunity, which involves creating an environment that fosters cooperation, acceptance, democracy, and free expression of ideas, and that is welcoming to men and women, persons with disabilities, and individuals from all ethnic and other groups that are protected from discrimination. In so doing, the district places great emphasis on the recruitment of potential applicants in order to create a diverse pool of qualified individuals from which to hire. With a diverse pool, the district takes steps within the screening/selection process to allow for the hiring of candidates with varied backgrounds who can contribute and effectively communicate in a diverse community. The equal employment opportunity provisions below are applicable to all full-time and part-time hiring, including any hiring meant to address the ratio of full-time to part-time faculty that may be required by Education Code section 87482.6.

To address any identified underrepresentation of monitored groups pursuant to Plan Component 11, the district will revise its recruitment and hiring procedures and policies in accordance with the following provisions. These provisions will be in place henceforth, whether or not underrepresentation exists, because the provisions are also valuable in ensuring equal employment opportunity. The district's Recruitment and Hiring Procedures will be revised to include in its section on recruitment the following provisions:

1) Recruitment

It is the policy of the district to aggressively pursue a program of verifiable recruitment that is inclusive and open to all individuals.

Efforts will be undertaken on a regular basis to develop and contact new recruitment sources that ensure diverse pools of candidates. Diverse pools should include, but not be limited to, men, women, persons with disabilities, and individuals from all ethnic and other groups protected from discrimination. The Equal Employment Opportunity Advisory Committee is encouraged to utilize and notify the district of additional recruitment options that may enable the district to obtain a diverse pool of applicants. The district will include in the recruitment section of its Recruitment and Hiring Procedures the following provisions:

- a) For any job category where continuing underrepresentation exists, the district will apply the recruitment procedures set forth in title 5, section 53021 to conduct full and open recruitment for all new openings and will not invoke the provisions for in-house interim appointments or the exception under 53021(c)(7) for engaging an administrator through a professional services contract unless the Chancellor or his/her designee first notifies the governing board and the Equal Employment Opportunity Advisory Committee in writing of the compelling reason to limit the persons who may be considered for a vacancy in a job category where underrepresentation persists.
- b) Recruitment for all open positions shall include, but not be limited to, placement of job announcements in the following instruments:

- (1) General circulation newspapers, general circulation publications, and general market radio and television stations, including electronic media.
 - (2) Local and regional community newspapers.
 - (3) Newspapers, publications, and radio and television stations that provide information in languages other than English and to low-income communities.
 - (4) Publications, including electronic media that are distributed to the general market and to newspapers, publications, and radio and television stations, whose primary audience is comprised of groups found to be underrepresented in the district's workforce.
 - (5) Recruitment booths at job fairs or conferences oriented to both the general market and the economically disadvantaged as well as those events drawing significant participation by groups found to be underrepresented in the district's workforce.
- c) At least every two years, or when necessary, the district shall host an open house for persons interested in employment with the district. The open house will allow potential candidates to meet deans, faculty and classified employees of the district. Attendees will be provided with information regarding current job openings, the demographic makeup of the student body, hiring criteria and procedures, and information on the district's commitment to equal employment opportunity. Efforts will be made to attract diverse groups of individuals to the open house.

2) *Job Announcements*

The district's Recruitment and Hiring Procedures section will be revised to include the following provisions:

- a) Job announcements will state clearly job specifications setting forth the knowledge, skills, and abilities necessary to job performance. For all positions, job requirements will include demonstrated sensitivity to and understanding of the diverse academic, socioeconomic, cultural, disability, and ethnic backgrounds of community college students. For faculty and administrative positions, requirements will also include knowledge of the history and culture of underrepresented groups and groups that have experienced discrimination. All faculty and administrative positions will state as a preferred or desired qualification knowledge of multiculturalism

and training in cultural proficiency.¹ Job specifications, including any “required,” “desired,” or “preferred” qualifications beyond the state minimum qualifications which the district wishes to utilize, will be reviewed by the equal employment opportunity officer before the position is announced, to ensure conformity with equal employment regulations and state and federal nondiscrimination laws. All job announcements shall state that the district is an Equal Opportunity Employer.

- b) For identified public contact or community liaison positions, bilingual ability in the language spoken by a significant number of students may be a required qualification. Before bilingual ability in the identified languages can be made a required qualification, the district will conduct an analysis to ensure that such a requirement meets the standard for a bona fide occupational requirement. The district will identify the specific positions that may require bilingual ability and the language(s) needed; and in which positions bilingual ability in a particular language may be listed as a required, preferred, or desired qualification.

3) *Review of Initial and Qualified Applicant Pools*

Initial applicant pools will be reviewed for projected representation of monitored groups. Once the initial pool is approved, the pool will be screened for minimum qualifications, resulting in a qualified applicant pool. 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 district’s Recruitment and Hiring Procedures will be revised to include the following provisions:

- a) The application for employment shall allow for voluntary self-identification of the applicants ethnic group identification and, if applicable, his or her disability. This information shall be kept confidential and shall be used only in research, monitoring, evaluating the effectiveness of the EEO plan or any other purpose specifically authorized in this subchapter or by any applicable statute or regulation.
- b) *Initial Applicant Pool:* The initial applicant pool is composed of all applications received by the application deadline. Once the application deadline has passed, the composition of the initial applicant pool shall be recorded and reviewed by the Director of Human Resources or designee.

Title 5, section 53022 does not require “knowledge of history and culture of underrepresented groups and groups that have experienced discrimination.” Nor does it require the preferred or desired language regarding “multiculturalism” or “cultural proficiency.” The district here has chosen to make these additional requirements to the “sensitivity and understanding” language required by section 53022. They are provided here as examples of a recommended practice. (title 5 only makes the “sensitivity” and “understanding” language applicable to faculty and administrators, the sample district here has chosen to make it applicable to all employees.)

All initial applications shall be screened to determine which candidates satisfy the job specifications set forth in the job announcement. The group of candidates who meet the job specifications shall constitute the “qualified applicant pool.”

- c) *Qualified Applicant Pool:* The qualified applicant pool is composed of those applicants from the initial applicant pool who satisfy the minimum qualifications set forth in the job description. Before the qualified applicant pool is forwarded to the screening/selection committee, its composition will be analyzed to ensure that no monitored group is adversely impacted. If adverse impact is found to exist, effective steps will be taken to address the adverse impact before the selection process continues. Such steps may include, but are not limited to:

Step 1: 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.

Step 2: Including all applicants who were screened out on the basis of any locally established qualifications beyond the state minimum qualifications which have not been specifically demonstrated to be job-related and consistent with business necessity through a process meeting the requirements of federal law.

Step 3: If the minimum qualifications stated on the job announcement are changed, the job announcement will be reposted.

Step 4: If adverse impact persists after taking *Steps 1* and *2* above, the selection process may proceed only if:

- (i) The job announcement does not require qualifications beyond the statewide minimum qualifications, or
- (ii) Locally established qualifications beyond state minimum qualifications, if any, are demonstrated to be job-related and consistent with business necessity through a process meeting the requirements of federal law and suitable alternative selection procedures to reduce the adverse impact were unavailable.

Step 5: Once the qualified applicant pool is approved, the pool will be forwarded to the screening/ selection committee for paper screening, interviews, and final recommendations for hiring consideration.

- d) The district will not advertise or utilize in future hiring processes for the same position or a substantially similar position any locally established qualifications beyond state minimum qualifications that the district was

unable to verify under *Step (c) 2* above unless such qualifications are so verified in advance of commencing any such future hiring process.

4) *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 be revised to 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, and ethnic backgrounds of community college students;
 - (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 equal employment opportunity officer should approve the makeup of selection/screening committees. If the equal employment opportunity officer does not approve a selection/screening committee for lack of

diversity, he or she should take necessary steps to remedy the lack of diversity.

- d) Before a person can serve on a selection/screening committee, he or she must receive equal employment opportunity and diversity training.
- e) Interviews must include at least one question which assess the candidate's understanding of and commitment to equal employment opportunity and his or her level of cultural proficiency.
- f) All screening materials must be approved for compliance with equal employment opportunity principles.
- g) Monitoring for adverse impact will occur at each of the following stages of the screening/selection committee process:
 - (1) After the selection/screening committee has conducted the paper screening and **prior** to contacting any of the applicants for interviews. Interviews cannot be scheduled until the applicant pool has been approved and cleared for adverse impact.
 - (2) After the applicants have been interviewed and **prior** to forwarding finalists to the hiring administrator. Finalists cannot be forwarded for hiring consideration until the applicant pool has been approved and cleared for adverse impact.
- h) If monitoring for adverse impact reveals that any selection technique or procedure has adversely impacted any monitored group, the chancellor or his/her designee will do the following:
 - 1) Suspend the selection process and take timely and effective steps to remedy the problem before the selection process resumes.
 - 2) When appropriate, assist the screening committee by discussing the overall composition of the applicant pool and the screening criteria or procedures, which have produced an adverse impact, provided that confidential information about individual candidates is not disclosed.
 - 3) If adverse impact results from locally established qualifications beyond state minimum qualifications that have not been verified as job-related and consistent with business necessity, the use of such locally established qualifications will be immediately discontinued and any applicants eliminated on the basis of such qualifications will be placed back in the pool and continue to be considered during the hiring process.

- 4) Where necessary, the position may be reopened at any time and a new selection process initiated in a way designed to avoid adverse impact.
- i) 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.
- j) 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 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.
- k) 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 Equal Employment Opportunity Advisory Committee to recommend new methods to meet the *Plan* objectives, or if necessary, to modify the *Plan* itself to ensure equal employment opportunity.

XII. Additional Steps to Remedy Significant Underrepresentation

In the workforce and applicant analysis, West Hills Community College District identified particular monitored groups that are significantly underrepresented with respect to one or more job categories. In order to address these instances of significant underrepresentation, the district will take the following steps:

- 1) The district will request that the Equal Employment Opportunity Advisory Committee, in conjunction with appropriate human resources staff, review the District's recruitment procedures and make recommendations on modifications that would address the underrepresentation.
- 2) The district may increase the advertising and recruitment budget for a three-year period to ensure that recruitment is broad and inclusive.
- 3) The district will require that the dean or responsible administrator for the division or department where the significant underrepresentation occurs develop, in conjunction with the equal employment opportunity officer, a recruitment and hiring program to assist in addressing the significant underrepresentation. The program should include additional locations or resources to advertise positions that would likely attract candidates from the significantly underrepresented groups; whatever changes in staffing, curricular offerings or department structure would assist in attracting candidates from significantly underrepresented groups; additional training for current faculty and staff on the value of a diverse workforce; and recommended changes to the job announcement and screening criteria, including interview questions, that may reasonably be expected to attract candidates from the significantly underrepresented group. The responsible administrator(s) will be evaluated on the ability to develop and implement this recruitment and hiring program.
- 4) The district will develop and implement an intern program where graduate students will be provided the opportunity to co-teach a class offered by the district. The intern program will be designed to interest graduate students in teaching at community colleges and provide them with teaching experience. The program will be designed to provide a diverse group of students with this opportunity.
- 5) The district will actively monitor the representation rate of each group, which was identified as being significantly underrepresented in one or more categories. If significant underrepresentation persists for a particular group in the job category in question, after the measures described above have been in place for a period of at least three years, the district will:
 - a) Review each locally established "required," "desired," or "preferred" qualification being used to screen applicants for positions in the job category to determine if it is job-related and consistent with business necessity through a process meeting the requirements of federal law.

- b) Discontinue the use of any locally established qualification that is not found to satisfy the requirements set forth in the previous paragraph and continue using qualification standards meeting the requirements in the previous paragraph only where no alternative qualification standard is reasonably available which would select for the same characteristics, meet the requirements of the previous paragraph, and be expected to have a less exclusionary effect.
- c) May increase the recruitment budget for another three years and hire a staff person to work on recruitment full-time for at least a two-year period if necessary.
- d) Develop a recruitment committee composed of the college president, the human resource director, the equal employment opportunity officer, the dean or responsible administrator for the division or department where the significant underrepresentation persists and members of the Equal Employment Opportunity Advisory Committee to review the effectiveness of the recruitment and hiring program described in *section 3* above. The committee will provide recommendations to modify the recruitment and hiring program to better address the significant underrepresentation. The college president will be evaluated on his/her ability to successfully implement the recruitment and hiring program.

XIII. Other Measures Necessary to Further Equal Employment Opportunity

West Hills Community College District recognizes that multiple approaches are appropriate to fulfill its mission of ensuring equal employment opportunity and the creation of a diverse workforce. 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 and in all job categories. Ensuring equal employment opportunity also involves creating an environment that fosters cooperation, acceptance, democracy, and free expression of ideas and is welcoming to men and women, persons with disabilities, and individuals from all ethnic and other groups protected from discrimination. To that end, in addition to the steps to address underrepresentation and/or significant underrepresentation, the district will implement a diversity program. Having a district that has accepted principles of diversity and multiculturalism can make implementation and maintenance of an effective equal employment opportunity program much easier. For that reason, institutionalizing a diversity program that is well planned out, well-funded, and supported by the leadership of the district can be of great value. The district will sponsor cultural events and speakers on issues dealing with diversity, and explore how to infuse diversity into the classroom and curriculum. The district will promote the concept of cultural proficiency and it will develop an evaluation form that integrates diversity into the evaluation of employees. The district will also promote learning opportunities and personal growth in the area of diversity and evaluate how the physical environment can be responsive to its diverse employee and student populations. In implementing a diversity program, the district shall do the following:

- 1) Establish a diversity program that is part of the structure of the district and that will be adequately funded and supported by the district and campus leadership.
- 2) Conduct campus climate studies to identify hidden barriers.
- 3) Include guest speakers from underrepresented groups who are in leadership positions and who may inspire students and employees alike.
- 4) Highlight the district's equal employment opportunity and diversity policies in job announcements and in its recruitment, marketing, and other publications. Include in job announcements language indicating that candidates are required to demonstrate that they can infuse diversity into their major job duties.
- 5) Conduct diversity dialogues, forums, and cross-cultural workshops.
- 6) Work with the college and district committees to assist in the development of a "Diversity Instructional Tool Kit" as a resource for faculty interested in infusing diversity and multiculturalism into their instruction or services to students.
- 7) Review and revise college/district publications and other marketing tools to reflect diversity in pictures, graphics, and text to project an inclusive image.

- 8) Recognize and value staff and faculty who have promoted diversity and equal employment opportunity principles by awarding a yearly diversity recognition award.
- 9) Require a series of EEO/diversity workshops at all instructional improvement days (flex week or staff development day).
- 10) Evaluate administrators yearly on their ability and efforts to meet the district's equal employment opportunity and diversity efforts.
- 11) 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.
- 12) Promote sabbaticals that will assist the district in achieving its equal employment opportunity and diversity objectives.
- 13) Promote various cultural celebrations on campus.
- 14) Recognize multilingualism and knowledge of multiculturalism as a desired, and when appropriate, required skill and qualification for community college employees.
- 15) Have a formal diversity program on campus that is visible, valued and adequately funded.
- 16) Consider providing for alternative educational or experience requirements for nonacademic positions.
- 17) Develop leadership opportunities with current staff focusing on diversity.
- 18) Establish a *Community Outreach Advisory Council* to involve community-based organizations in the recruitment and other equal employment opportunity efforts of the college. Recommended membership will include representatives from local business and industry as well as from diverse community groups such as MALDEF, NAACP, Chamber of Commerce, and City Council(s).
- 19) Ensure that top administrative staff support diversity objectives and that the diversity and/or equal employment opportunity officer position is maintained as a cabinet or other high-level administrative position.
- 20) Seek direct contact with student, professional, community and other organizations that represent the diverse community we serve. These organizations can serve as resources for referring potential candidates.

XIV. Persons with Disabilities: Accommodations and Goals for Hiring

1) *Reasonable Accommodations*

Applicants and employees with disabilities² shall receive reasonable accommodations consistent with the requirements of Government Code, sections 11135 et seq. and 12940(m); section 504 of the Rehabilitation Act of 1973; and the Americans with Disabilities Act. Such accommodations may include, but are not limited to, job site modifications, job restructuring, part-time work schedules, flexible scheduling, reassignment to a reasonably equivalent vacant position, adaptive equipment, and auxiliary aides such as readers, interpreters, and notetakers.

The Human Resources Department is responsible for handling requests for accommodations from current employees and from applicants seeking such accommodations during the application process.

2) *Procedures When Underrepresentation is Found*

When persons with disabilities are found to be significantly underrepresented, measures required this *Plan* will be implemented concurrently with the goals set forth below.

3) *Goals for Persons with Disabilities*

Currently the projected representation for persons with disabilities is only required by the total district workforce and not by job categories.

² See the definition of “person with a disability” in the definitions section of the *Plan*. A more detailed definition of physical and mental disability is found in Government Code, section 12926. California has a broader definition of disability than the ADA. California also requires accommodations to be made under circumstances where accommodations might not be necessary under federal law.

XV. Graduate Assumption Program of Loans for Education

West Hills Community College District encourages community college students to become qualified for, and seek employment as, community college employees. The district shall inform students about programs that may assist them to complete their studies and become community college employees. The district will post informational flyers on the campuses concerning such programs, and make information available in student newspapers, the course catalog, and in locations accessible to students. Efforts will be made to inform graduate students in local colleges and universities about the benefits of employment at a community college.