

**LANE COMMUNITY COLLEGE
EXECUTIVE ORDER 11246
AFFIRMATIVE ACTION PROGRAM**

For Females and Minorities

Plan Effective Date: 10/15/2014

Plan Expiration Date: 10/15/2015

AAP Administrator: Dennis Carr, MSIR
Chief Human Resources Officer

Approved by: Dr. Mary Spilde,
President

Establishment's Name: Lane Community College

Establishment's Address: 4000 E 30th Ave
Eugene Oregon 97405

LANE COMMUNITY COLLEGE
AFFIRMATIVE ACTION PROGRAM
for
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CONFIDENTIAL TRADE SECRET MATERIALS

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

POLICY STATEMENT

Lane Community College (College) is committed to providing a working and learning environment that is free from discrimination, harassment and retaliation. Lane is committed to equal employment opportunity in education and employment, affirmative action as well as diversity. Lane Community College is also committed to complying with guidelines covering the employment of Veterans and full compliance with the employment of persons with disabilities consistent with the Americans with Disabilities Act. The College prohibits discrimination in employment practices and decisions on the basis of race, color, ethnicity, religion, national origin, gender, sexual orientation, marital status, familial relationships, parental status, disabilities, expunged juvenile criminal record or veterans' status. This commitment is made by the College in accordance with federal, state, and local laws, and regulations. Inquiries may be directed to the Chief Human Resource Officer, Lane Community College, 4000 30th Avenue, Eugene, Oregon, 97405-0640; 541-463-5585.

College Information:

It is forbidden under Lane Community College Hiring Process Procedures for Human Resources staff to disclose any confidential demographic information provided to the College via employment applications or by current employees. Applicant and employee demographic data is considered strictly confidential.



Lane Community College
EXECUTIVE ORDER 11246
AFFIRMATIVE ACTION PROGRAM

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I. Establishment of Responsibilities for Implementation of the Written Affirmative Action Program (41 CFR 60-2.17(a))

A. Designation of Responsibilities of AAP Administrator (41 CFR 60-2.17(a))

In accordance with 41 CFR-2.10 federal contractors are required to administer an affirmative action program to ensure equal employment opportunity. In compliance with and in good faith, this narrative text contains the following components: Designation of responsibility for implementation, identification of problem areas, a detailed action-oriented program and information on internal audit conditions. Human Resource Recruitment Analyst LynnMarie Chowdhury completed the data analysis for the required reports and the 2014-2015 narrative has been updated by Chief Human Resource Officer Dennis Carr. In accordance with regulations the appendices contain five required reports: Organizational profile, Job group analysis, Placement of incumbents in job groups, Determining availability, Comparing incumbency to availability and Placement goals.

The responsibilities of the Affirmative Action team and Chief Diversity Officer, supervised by Dennis Carr, CHRO, include but are not necessarily limited to, the following:

1. Developing EEO policy statements, Affirmative Action Programs, and internal and external communication procedures;
2. Assisting in the identification of AAP/EEO problems;
3. Assisting management in arriving at effective solutions to AAP/EEO problems;
4. Designing and implementing an internal audit and reporting system that:
 - a) Measures the effectiveness of the Affirmative Action Program;
 - b) Determines the degree to which AAP goals and objectives are met; and
Identifies the need for remedial action
5. Keeping company's management informed of equal opportunity progress and reporting potential problem areas within the company through reports;
6. Reviewing the company's AAP for qualified minorities and women with all levels of management to ensure that the policy is understood and is followed in all personnel activities;
7. Auditing the contents of the company's bulletin board to ensure compliance information is posted and up-to-date; and
8. Serving as liaison between Lane Community College and enforcement agencies.

B. The Responsibilities of the Lane Community College's Management team to Ensure Implementation of the AAP (41 CFR 60-2.17(a))

President - Mary Spilde

Assure compliance with equal employment opportunity/affirmative action requirements and participates in the resolution of various legal and complaint issues. Responsible for the indirect oversight of internal and external processes while ensuring overall compliance with the college's Affirmative Action and Equal Employment Opportunity (AA/EEO) plan and policies.

Vice President (s) – Dawn DeWolf

Assure compliance with equal employment opportunity/affirmative action requirements and participates in the resolution of various legal and complaint issues. Ensure staff development on diversity, inclusive classroom climate, and respectful learning and working environment issues.

Executive Deans and Program Directors

Assure the implementation of the College's Affirmative Action and Equal Employment Opportunity concerning policies, goals, and timetables in assigned areas. Ensure staff development on diversity, inclusive climate and respectful learning and working environment issues.

Chief Human Resource Officer - Dennis Carr

Under the direction of the College President, Lane's Human Resources Dept. and the Chief Human Resource Officer (CHRO), staff in the President's Office and Human Resources Department advise on problem areas and coordinate investigations and resolution of complaints. The President, the Chief Diversity Officer and the Chief Human Resource Officer are responsible for overall review of college compliance with applicable state and federal laws. Working through the President's Office and the Office of the Chief Diversity Officer, the Chief Human Resource Officer is responsible for ensuring completion and implementation of the annual AA Plan update, and compliance with the AA/EEO plan. Personnel assigned to complete the AA Plan data analysis are responsible for analyzing and presenting accurate and verifiable data, annually and in a timely manner, consistent with OFCCP guidelines. These required data analyses are completed for the use and information of the President, the Chief Diversity Officer, the executive team, the Chief Human Resource Officer, Union Officers, the HR recruitment team and other interested parties.

Human Resource Recruitment Analysts

The Chief Human Resource Officer and the HR Analysts assigned to support recruitment, in collaboration with the President's office, the office of the Chief Diversity Officer and diversity subject matter experts, are responsible for research and implementation of EEO/AA recruitment best practices while communicating with individuals and agencies inside and outside of the college; including staff, students, the public, community leaders, civic and grassroots organizations. Personnel assigned to complete the AA Plan data analysis and HR Analysts assigned to perform recruitment duties may be called upon to provide expert guidance to the Executive Team, college managers and other interested parties upon request. The Chief Human Resource Officer (CHRO) is responsible for assuring that Lane's affirmative action programs contain a diagnostic component which includes five (5) required quantitative analyses that are designed to evaluate the composition of the workforce and compare it to the composition of the

relevant labor pools. The CHRO and the HR Recruitment Analysts are responsible for the development of action-oriented programs in response to the analyses. As part of the Affirmative Action programs, the Human Resources Analysts responsible for recruitment monitor AA/EEO practices and outcomes during all phases of the recruitment process. This includes reviewing placement goals and informing the Chief Human Resource Officer of all concerns.

College Managers and Administrators

Assure the implementation of the College's Affirmative Action Plan and Equal Opportunity policies, goals, and timetables within the Human Resources Department (www.lanecc.edu/afirmact/home.htm). Actively support staff development on diversity, inclusive climate, and respectful learning and working environment issues.

Department/Division Deans(s)

Provide leadership in the development of multicultural and diversity-based curricula in instructional areas as well as staff development in these areas. Provide leadership in the implementation of Division and College-wide diversity initiatives (www.lanecc.edu/afirmact/home.htm). College managers must maintain awareness of placement goals and utilize placement goals as well as good faith efforts to guide recruitment efforts for part-time and full-time employees in all three employee groups.

Hiring Committee Chair(s)

Under the guidance of the Chief Human Resource Officer and the HR Analysts assigned to recruitment duties, Search Committee Chairs and Committee Members are responsible for ensuring diverse hiring committees and ethical hiring practices that reflect the College Affirmative Action goals and action-oriented program. Search Committee Chairs and Co-chairs are required to participate in training concerning EEO/AA guidelines.

The Responsibilities of the Lane Community College Management group is to Ensure Implementation of the AAP (41 CFR 60-2.17(a))

In implementing this written Affirmative Action Program, it is the responsibility of the company's administrators, supervisors and managers to work with the Human Resources and the Chief Diversity Officer to:

- a) Assist in the identification of problem areas, formulating solutions, and establishing departmental goals and objectives when appropriate;
- b) Review the qualifications of all applicants and employees to ensure qualified individuals are treated in a nondiscriminatory manner when hiring, promotion, transfer, and termination actions occur.

II. Identification of Problem Areas (41 CFR 60-2.17(b))

Lane Community College performs analysis of its total employment process to determine if there are areas where minority and/or female groups may face impediments to equal opportunity. The following analyses are conducted in order to reveal any potential problem areas:

- a) Placement Goals: An analysis of incumbency versus availability is performed to determine whether there are problems of minority and/or female utilization.
- b) Whenever a problem exists, as defined by a statistical methodology, Placement Goals are set. (see the Placement Goals report which follows this section).
- c) Each category where a “yes” is stated indicates a placement goal based upon underutilization (insufficient representation) of women and/or minorities in particular job groups at Lane Community College.
- d) Review of Employment Decisions: A review of employment decisions is made using placement goals and availability-incumbency in order to determine whether or not minorities and/or females are selected at a less favorable rate than non-minorities and/or males. A review of non-minorities and/or males is also conducted to determine if either group is being selected at a statistically significant lessor rate than minorities and/or females.

A. Placement Goals

41 C.F.R. §60-2.16

When the percentage of minorities or women employed in a particular job group (see above) is less than would reasonably be expected given their availability percentage in the reasonable recruitment area for that particular job group, the OFFCP guidelines require Lane Community College to establish placement goals. Each category above where “yes” is stated indicates a placement goal based upon underutilization (insufficient representation) of women and/or minorities in particular job groups at Lane Community College.

There were 25 placement goals in the AA Plan for 2008/2009 (5 for women and 20 for minorities). There are 23 placement goals (7 for women and 16 for minorities) based upon the 2009/2010 data. This represented some progress two years ago by Lane Community College in meeting AA Plan placement goals, especially for minority protected classes. The current 2013/2014 update for the College’s Affirmative Action Plan documents 21 placement goals (6 for women and 15 for minorities) based upon the 2012-2013 data; this is a reduction of 2 placement goals compared to 2010/2011, and a reduction of 4 placement goals during the past five AA Plan cycles. While we would prefer faster progress on meeting the College’s placement goals, the trend is in a positive direction. Budget challenges starting in the 2012/2013 academic year and continuing through 2014/2015 also precluded the College from posting many full-time vacancies for competitive

regional and national searches, which has caused a slowing in progress to address the lingering AAP placement goals where under-utilization of protected classes is still a challenge.

Placement Goals should not be confused with “quotas” or “set-asides,” as they are simply representations used to guide “good faith efforts” to recruit minorities and women into underutilized job groups. Furthermore, placement goals should not be construed as an admission or finding of legal discrimination. They are only used to monitor progress toward assuring equal employment opportunity.

Whether there are Placement Goals or not, steps will be taken to encourage and increase the percentage of qualified minorities and/or females applying for positions both externally and internally. These steps may include, but are not limited to the following:

- a) Working with administrators, managers and search committees to determine appropriate outreach to attract qualified applicant pools;
- b) Publishing job advertisements in newspapers and/or magazines that target minorities and/or females;
- c) Offering tuition reimbursement to employees to obtain training that will increase their chances of advancement;
- d) Using recruitment companies that specifically target minorities and/or females; and
- e) Continuing to use the services of the respective Employment Service Delivery System, Oregon Employment Division.

Selection Disparities

The College has no data at this time to substantiate that there are selection disparities which negatively impact women and minorities concerning hiring, promotion, termination or other personnel actions. The College also has no data to reflect that there are selection disparities against qualified veteran's or qualified individuals with disabilities. Implementation of the PeopleAdmin software by Human Resources has enhanced applicant tracking and allows for an “audit” at each step of recruitment processes.

Job Group Changes

Due to the changing nature of work at Lane Community College, particularly in the Classified Job Groups has required a realignment of one job group, with a new job group name (21 Para-professional; Technology and/or Administrative.) The previous job group alignment had only two people in the job group, which is statistically insignificant.

- a) The addition of a new job group (22 Technical Support, Intermediate) will be used for Technology Computer Support, Help Desk, Tech Equipment, Information Technology Techs etc..
- b) Job group 23 has a new name. This is to reflect the database administrations, network and infrastructure positions. This has been discussed with CIO, Bill Schuetz. The growing number of staff who is providing simple computer support is increasing. The new group

also allows for administrative staffs that are doing unique project work.

- c) Job group size will be evaluated with the 2016 plan year. A job group, to be significantly valid should have at least 30 employees. Lane's job group size has not been evaluated since the late 1990's under Affirmative Action Director, Jose Ortal.
- d) It is important to note that the word Technician (the old job group name) does not indicate computer technology. This incorrect title has been used by Lane since 2000. To clarify, a technician by EEO definition is representative of specific skill positions such as chemical technicians, drafters, engineering technicians, medical office technicians and non-teaching Dental Hygienist or Assistants. Previously, regardless of training or education all computer positions were considered Technicians. Computer positions in job group 22 & 23 are professionals (EEO2), those in job group 21 reflect EEO5 or EEO6. This job group is expected to grow as admin positions require a higher level of computer skills; yet still provide administrative support.
 - o These changes affect the evaluation of placement and attainment goals for job groups, #21, #22.and #23.

Incumbency v. Estimated Availability

Lane CC AAP 2014-2015 10/15/2015

Comparison Rule

80% with Whole Person Rule

Incumbency v. Estimated Availability

Lane CC AAP 2014-2015

10/15/2015

		Less than 80% ?	
Job Group		Female	Minority
10	Senior Executives		Yes
11	Non-Instructional Managers		Yes
12	Instructional Managers	Yes	
13	Arts & Letter Faculty		
14	Science & Math Faculty		Yes
15	Trade & Tech Skills Faculty		Yes
16	Basic Skills Faculty		Yes
17	Health & Athletic Faculty		Yes
18	Non-Instructional Faculty	Yes	
19	Prof Coord;incl Media Relation		
20	Professional; HR, Finance		
21	Para-prof;Technology &/or Adm		Yes
22	Technical Support; intermediat		Yes
23	Computer Professional,complex	Yes	Yes
24	Student Srv & Instruct Support		
25	Administrative Support		Yes
26	Craft (skilled)		Yes

Comparison of Incumbency to Availability is performed using the 80% with Whole Person Rule
 Yes indicates 80% Ratio < 80.0 and Difference <= -1.0

80%

Incumbency v. Estimated Availability

Lane CC AAP 2014-2015

10/15/2015

Job Group	Less than 80% ?	
	Female	Minority
27 Operatives (semi-skilled)		
28 Service Worker	Yes	Yes
29 Laborers (unskilled)	Yes	
PT30 PT Arts & Letter Faculty		
PT31 PT Science & Math Faculty		
PT32 PT Trade & Tech Faculty		Yes
PT33 PT Basic Skills Faculty		Yes
PT34 PT Health & Athletics Faculty		
PT36 PT Prof. Coordinators; Media		
PT37 PT Craft worker (skilled)		
PT38 PT Prof Finance/HR		
PT39 PT Para-prof;Tech &/or Admin		Yes
PT40 PT Computer Professional,compl		
PT41 PT Student Srv & Instr Support		
PT42 PT Administrative Support		
PT44 PT Operative (semi-skilled)		
PT45 PT Service Worker		

Comparison of Incumbency to Availability is performed using the 80% with Whole Person Rule
 Yes indicates 80% Ratio < 80.0 and Difference <= -1.0

80%

Incumbency v. Estimated Availability

Lane CC AAP 2014-2015

10/15/2015

Less than 80% ?		
Job Group	Female	Minority
PT46 PT Laborer (unskilled)		
PT47 PT Technical Support; interme		

Comparison of Incumbency to Availability is performed using the 80% with Whole Person Rule
 Yes indicates 80% Ratio < 80.0 and Difference <= -1.0

80%

B. Incumbency v. Estimated Availability Analysis

C.F.R. §60-2.15

This statistical analysis is one of the most significant reports to a contractor (and the OFCCP) since it compares the proportion of minorities and females already in a contractor's work force against the availability estimate of the proportion of minorities and females in a given recruitment area (as calculated in the Availability Analysis).

- a) Pursuant to the requirements of 41 C.F.R. § 60-2.15, Lane Community College has compared the percentage of minorities and women in each job group with the rates of availability for those job groups in the reasonable recruitment areas. Where the percentage of minorities or women was less than would reasonably be expected given their availability, Lane Community College established a goal in accordance with 41 C.F.R. § 60-2.16.

The "YES" that appears in some of the columns on the chart below represent areas where there are either fewer minorities or fewer women in Lane's current workforce than would be reasonably expected in the given recruitment area. For example, a "YES" appears under job group "011 Non-Instructional Managers" for "minority." This means that under the "80% rule," the demographic profile of the current Lane workforce in this job group does not come within 80% of the expected proportion of minorities in the reasonable recruitment area. The reasonable recruitment area for the college varies depending upon the nature of the job classification. For example, Lane Community College recruits managers and contracted (full-time) faculty nationally, while classified employees are recruited from a local and regional recruitment area. Diversity recruiting resources are always used for posting vacancies in all three employee groups. When there is a placement goal for either women or minorities in a given job group, "good faith efforts" must be used to create equal employment opportunity for members of these protected classes. It is important to note, that such an analysis does not constitute a de facto finding of discrimination.

III. Accomplishment of Prior Year Placement Goals (Goal Attainment)

Where goals were established for the prior year, the Lane developed action-oriented programs designed to accomplish the established goals and objectives, thereby enhancing employment and advancement opportunities in the company for minorities and/or females.

As Lane Community College continues to advance data collection methods, specific changes will be isolated.

The goal attainment report for this plan year, 2015, is incomplete. There is limited data available to calculate all job groups. Note that a “-“ in this reports indicates lack of movement in the job group or the lack of information. A goal attainment report will be provided with all successive plan years. It is expected that data collection methods for Veterans and those with disabilities will reflect the workforce with the 2017-2018 Affirmative Action Plan.

It is factually accurate that there were previously 23 placement goals for minority and female underutilization in job groups prior to the current update for 2014/2015. The updated AA Plan report confirms there are now 20 placement goals using the same 80% rule that was used for the prior AA Plan reports.

Annual Placement Goals Attainment Report

Lane CC AAP 2014-2015 10/15/2015

Annual Placement Goals Attainment Report

Lane CC AAP 2014-2015

10/15/2015

Job Group	Total Movements	Category	Movements (#)	Movements (%)	Goals (%)	Goal Attained ?
10 Senior Executives	6	Female Minority	4 0	66.67 0.00	17.01	No
11 Non-Instructional Managers	5	Female Minority	3 0	60.00 0.00	18.92	No
12 Instructional Managers	11	Female Minority	5 0	45.45 0.00	50.96	No
13 Arts & Letter Faculty	4	Female Minority	4 0	100.00 0.00		
14 Science & Math Faculty	3	Female Minority	3 0	100.00 0.00	16.00	No
15 Trade & Tech Skills Faculty	4	Female Minority	0 0	0.00 0.00	19.86	No
16 Basic Skills Faculty	4	Female Minority	4 0	100.00 0.00	11.68	No
17 Health & Athletic Faculty	1	Female Minority	1 0	100.00 0.00	15.41	No
18 Non-Instructional Faculty	1	Female Minority	1 0	100.00 0.00	59.77	Yes
19 Prof Coord;incl Media Relation	5	Female Minority	5 0	100.00 0.00		
20 Professional; HR, Finance	3	Female Minority	3 2	100.00 66.67		

Goal Attained? Key:

* <blank>	Goal was not attained because there was no movement into this job group No goal to attain
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Annual Placement Goals Attainment Report

Lane CC AAP 2014-2015

10/15/2015

Job Group	Total Movements	Category	Movements (#)	Movements (%)	Goals (%)	Goal Attained ?
21 Para-prof;Technology &/or Adm	5	Female Minority	0 0	0.00 0.00	16.16	No
22 Technical Support; intermediat	1	Female Minority	0 0	0.00 0.00	25.07	No
23 Computer Professional,complex	2	Female Minority	0 0	0.00 0.00	29.28 24.81	No No
24 Student Srv & Instruct Support	37	Female Minority	32 8	86.49 21.62		
25 Administrative Support	22	Female Minority	19 4	86.36 18.18	14.99	Yes
26 Craft (skilled)	0	Female Minority	0 0		14.33	*
27 Operatives (semi-skilled)	3	Female Minority	1 0	33.33 0.00		
28 Service Worker	2	Female Minority	0 1	0.00 50.00	40.17 25.19	No Yes
29 Laborers (unskilled)	5	Female Minority	1 3	20.00 60.00	32.45	No
PT30 PT Arts & Letter Faculty	15	Female Minority	7 3	46.67 20.00		
PT31 PT Science & Math Faculty	4	Female Minority	2 0	50.00 0.00		

Goal Attained? Key:

* <blank>	Goal was not attained because there was no movement into this job group No goal to attain
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Annual Placement Goals Attainment Report

Lane CC AAP 2014-2015

10/15/2015

Job Group	Total Movements	Category	Movements (#)	Movements (%)	Goals (%)	Goal Attained ?
PT32 PT Trade & Tech Faculty	8	Female Minority	2 1	25.00 12.50	12.33	Yes
PT33 PT Basic Skills Faculty	16	Female Minority	12 3	75.00 18.75	15.60	Yes
PT34 PT Health & Athletics Faculty	8	Female Minority	7 1	87.50 12.50		
PT36 PT Prof. Coordinators; Media	0	Female Minority	0 0			
PT37 PT Craft worker (skilled)	0	Female Minority	0 0			
PT38 PT Prof Finance/HR	0	Female Minority	0 0			
PT39 PT Para-prof;Tech &/or Admin	3	Female Minority	1 0	33.33 0.00	22.19	No
PT40 PT Computer Professional,compl	1	Female Minority	0 0	0.00 0.00		
PT41 PT Student Srv & Instr Support	57	Female Minority	34 10	59.65 17.54		
PT42 PT Administrative Support	24	Female Minority	23 0	95.83 0.00		
PT44 PT Operative (semi-skilled)	1	Female Minority	0 0	0.00 0.00		

Goal Attained? Key:

* <blank>	Goal was not attained because there was no movement into this job group No goal to attain
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Annual Placement Goals Attainment Report

Lane CC AAP 2014-2015

10/15/2015

Job Group	Total Movements	Category	Movements (#)	Movements (%)	Goals (%)	Goal Attained ?
PT45 PT Service Worker	95	Female Minority	49 23	51.58 24.21		
PT46 PT Laborer (unskilled)	0	Female Minority	0 0			
PT47 PT Technical Support; interme	4	Female Minority	3 0	75.00 0.00		

Goal Attained? Key:

*	Goal was not attained because there was no movement into this job group
<blank>	No goal to attain

IV. The Development and Execution of Action-Oriented Programs (41 CFR 60-2.17(c))

Programs have been instituted to ensure no barriers to employment exist. These programs may include, but are not limited to, the following:

- a) Conducting annual analyses of job descriptions to ensure they accurately reflect job functions;
- b) Making job descriptions available to recruiting sources and available to all members of management involved in the recruiting, screening, selection and promotion processes;
- c) Evaluating the total selection process to ensure freedom from bias through:
 - Reviewing job applications and other pre-employment forms to ensure information requested is job-related;
 - Evaluating selection methods that may have a disparate impact to ensure that they are job-related and consistent with business necessity;
 - Training personnel and management staff on proper interview and selection procedures;
 - Training on EEO and other related policies for management and supervisory staff.
- d) Using techniques to improve recruitment and retention and to increase the flow of qualified applicants, including minority and/or female applicants, Lane undertakes the following actions:
 - a. Including the phrase “As an EEO/Affirmative Action Employer all qualified applicants will receive consideration for employment without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, disability, veteran status” or other acceptable tagline in all printed employment advertisements;
 - b. Placing employment advertisements in local minority news media and women’s interest media;
 - c. Disseminating information on job opportunities to organizations representing minorities and women and to employment development agencies when job opportunities become available;
 - d. Encouraging all employees to refer qualified applicants;
 - e. Actively recruiting at secondary schools, junior colleges, colleges and universities with predominantly minority and/or female enrollments; and
 - f. Requesting employment agencies to refer qualified minorities and women.
 - g. Ensuring that all employees are given equal opportunity for promotions and/or transfers. This is achieved by:
 - h. Posting opportunities internally;
 - i. Offering guidance to employees in identifying opportunities, training and educational programs to enhance promotions and opportunities for job rotation or transfer; and
 - j. Evaluating job requirements to ensure that they are appropriate.

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

The College has limited data at this time to substantiate that there are selection disparities which negatively impact women and minorities concerning hiring, promotion, termination or other personnel actions. The College has no data to reflect that there are selection disparities against qualified veteran's or qualified individuals with disabilities. With the implementation of the new Vevraa and Section 503 data collection requirements and appropriate software updates, Lane shall collect data to measure against the national aspirational goals for Veterans and Disabilities (7%) within three years as required by the Office of Federal Contract and Compliance.

Implementation of the PeopleAdmin software by Human Resources has enhanced applicant tracking and allows for an "audit" at each step of recruitment processes. This has improved and refined assessments of the recruitment processes. The recruitment software (PeopleAdmin) has also enabled Human Resources recruitment analysts to enhance our data assessment abilities and selectively monitor the recruitment and selection processes for evidence of challenges to equal employment opportunity up to and including the 2014/2015 academic year.

Compensation Disparities

Compensation disparities on the basis of gender, race or ethnicity are not a problem at Lane Community College for EEO/AA purposes due to seniority practices dictated by the Classified Union, Faculty Union, and Management Working Conditions Agreements. New employees are placed on the respective salary schedules based upon objective assessments of knowledge, skills, abilities, education, and experience. Initial salary placement criteria are outlined in the collective bargaining agreement. For all current employees, there is an appeal process to assure equity and accuracy in pay levels for employees with similar responsibilities, knowledge, skills, abilities, education, and experience.

The following personnel activities are reviewed, as necessary and desirable, to ensure nondiscrimination and EEO for all individuals without regard to their race, color, gender, religion, national origin, age, sex, sexual orientation, gender identity, pregnancy, genetic information, disability, veteran status, or any other legally protected status covered by applicable state or local law:

- a) Recruitment, advertising, and job application procedures;
- b) Hiring, promotion, upgrading, layoff, recall from layoff;
- c) Rates of pay and any other forms of compensation including fringe benefits;
- d) Job assignments, job classifications, job descriptions, and seniority lists;
- e) Sick leave, leaves of absence, or any other leave;
- f) Training, attendance at professional meetings and conferences; and
- g) Any other term, condition, or privilege of employment.

Lane Community College's audit system includes periodic review of employment decisions. Managers and supervisors are asked to report any current or foreseeable EEO problem areas and are asked to outline their suggestions/recommendations for solutions. If problem areas arise, the manager or supervisor is to report problem areas immediately to the AAP Administrator. During the reporting cycle, the following occurs:

1. The AAP Administrator will discuss any problems relating to substantial disparate impact, EEO charges, etc., with management; and
2. The AAP Administrator will report the status of the company's AAP goals and objectives to management. The AAP Administrator will recommend remedial actions for the effective implementation of the AAP.