Imperial Valley College
Equal Employment Opportunity Plan
2018-2021

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LEGAL AUTHORITY

California community colleges are mandated by the California Code of Regulations Title 5, section 53003(a); and the California Education Code, section 87100 to develop and implement an Equal Employment Opportunity Plan.

CALIFORNIA CODE OF REGULATIONS TITLE 5, SECTION 53003(A) – DISTRICT PLAN

The governing board of each community college district shall develop and adopt a district-wide written equal employment opportunity plan to implement its equal employment opportunity program. Such plans shall be submitted to the State Chancellor's Office. The Chancellor's Office retains the authority to review district plans on a case-by-case basis.

CALIFORNIA EDUCATION CODE, SECTION 87100 LEGISLATIVE FINDS & DECLARATIONS

(a) The Legislature finds and declares all the following:

(1) In fulfilling its mission within California's system of public higher education, the California community colleges are committed to academic excellence and to providing all students with the opportunity to succeed in their chosen educational pursuits.

(2) Academic excellence can best be sustained in a climate of acceptance and with the inclusion of persons from a wide variety of backgrounds and preparations to provide service to an increasingly diverse student population.

(3) A workforce that is continually responsive to the needs of a diverse student population may be achieved by ensuring that all persons receive an equal opportunity to compete for employment and promotion within the community college districts and by eliminating barriers to equal employment opportunity.

(b) It is the intent of the Legislature to establish and maintain within the California community college districts a policy of equal opportunity in employment for all persons, and to prohibit discrimination or preferential treatment based on ethnic group identification, or on any basis listed in subdivision (a) of section 12940 of the Government Code, as those bases are defined in sections 12926 and 12936.1 of the Government Code, except as otherwise provided in section 12940 of the Government Code. Every aspect of personnel policy and practice of the community college districts should advance the realization of inclusion through a continuing program of equal employment opportunity.

(c) The Legislature recognizes that it is not enough to proclaim that community college districts must not discriminate and must not grant preferential treatment on impermissible bases. The Legislature declares that efforts must also be made to build a community in which non-discrimination and equal opportunity are realized. It is the intent of the Legislature to require community college districts to adopt and implement programs and plans for ensuring equal employment opportunity in their employment practices.

TITLE 5, SECTION 53026 COMPLAINTS – VIOLATION OF EQUAL EMPLOYMENT OPPORTUNITY REGULATIONS

Each community college district shall establish a process permitting any person to file a complaint alleging that the requirements of this subchapter have been violated. A copy of the complaint shall immediately be forwarded to the Chancellor, who may require the district provide a written investigative report within ninety (90) days. Complaints that also allege discrimination prohibited by Government Code sections 11135 et seq. shall be processed according to the procedures set forth in subchapter 5 (commencing with section 59300) of Chapter 10 of this division.

Plan Component 1: Introduction

The Imperial Community College District Equal Employment Opportunity Plan ("EEO Plan") was adopted by the governing board on May 16, 2018. The Plan reflects the district's commitment to equal employment opportunity and its recognition that a diverse and inclusive workforce serves the educational mission of the District to prepare students for success in a global society.

The EEO Plan provides the process that the District will use to promote equal employment opportunity and diversity in its recruitment and hiring policies and practices (AP 7120), in conformance with the applicable title 5 regulations (section 53000 et seq.). The EEO Plan is intended to foster a working and learning environment that promotes diversity, inclusion, and equal employment opportunities. To properly serve a growing diverse population, the EEO Plan also reflects the District's commitment to hire and retain faculty and staff who are sensitive to, and knowledgeable of, the needs of the continually changing and diverse student body and community it serves.

The Imperial Community College District is committed to implementing Board Policy 3420, by developing and maintaining equal employment opportunity and diversity throughout the district as set out in this Equal Employment Opportunity Plan (hereinafter referred to as the "Plan" or the "EEO Plan".

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Superintendent/President's Signature
Dr. Victor Jaime, Superintendent/President

Plan Component 2: Definitions

CCR, Title 5, § 53001

Adverse Impact: a statistical measure (such as those outlined in the U.S. Equal Employment Opportunity Commission's *Uniform Guidelines on Employee Selection Procedures)* that is applied to the effects of a selection procedure and demonstrates a disproportionate negative impact on any group defined in terms of ethnic group identification, gender, or disability. A disparity identified in each selection process will not be considered to constitute adverse impact if the numbers involved are too small to permit a meaningful comparison.

Chief Human Resources Officer, (Office of Diversity, Equity and Inclusion): The person who is responsible for the day-to-day implementation of the Plan.

Diversity: a condition of broad inclusion in an employment environment that offers equality and respect for all persons. A diverse educational community recognizes the educational benefits that flow from employee populations that are varied by race, ethnicity, sexual orientation, gender identity and expression, disability or genetic information, age (40 or older), national origin, religion, socioeconomic status, geographic region, life experiences and other enriching characteristics.

***Equal Employment Opportunity*:** "Equal employment opportunity" means that all qualified individuals have a full and fair opportunity to compete for hiring and promotion and to enjoy the benefits of employment with the district. Equal employment opportunity should exist at all levels in the seven job 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: identifying and eliminating barriers to employment that are not job related; and creating an environment which 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 pursuant to Government Code section 12940.

***Equal Employment Opportunity and Diversity Advisory Committee*:** acts as an advisory body to the Chief Human Resources Officer and the District to promote understanding and support of EEO policies and procedures.

Equal Employment Opportunity Plan: a written document in which a district's workforce is analyzed; specific plans, procedures, and goals are set forth for ensuring equal employment opportunity.

Equal Employment Opportunity Policy Statement: statement by the Board confirming its commitment to EEO.

Equal Employment Opportunity Program: all the various methods and strategies 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 requirements of section 53006.

Ethnic Minorities: Native Americans or Alaskan natives, Asians or Pacific Islanders, Black/African-Americans, Hispanics/Latinos.

Ethnic Group Identification: "ethnic group identification" means an individual's identification in one or more of the ethnic groups reported to the Chancellor pursuant to section 53004.

In-house or Promotional Only Hiring: only district employees can apply for a position.

Monitored Group: those groups identified in section 53004 subdivision (b) for which monitoring, and reporting is required pursuant to section 53004 subdivision (a).

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.

Reasonable Accommodation: the efforts made on the part of the district to remove artificial or real barriers, which prevent or limit the employment and upward mobility of persons with disabilities. "Reasonable accommodations" may include the items designated in section 53025.

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.

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 subdivision (a) is below eighty percent (80%) of the projected representation for that group in the job category in question.

Plan Component 3: Policy Statement (Board Policy 3420)

CCR, Title 5, § 53002
[See also ICCD Board Policy/Administrative Procedure 3410, 3420, 7100 and 7120]

It shall be the policy of the Imperial Community College District that all qualified applicants and employees have equal opportunity to seek, obtain, hold, and advance in employment in the District, and are not subjected to discrimination on the basis of ethnic group identification, race, color, national origin, religion, age, sex (gender), physical disability, veteran status, mental disability, ancestry, sexual orientation, gender identity or expression, genetic information, or on the basis of these perceived 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 maintain a workplace that is welcoming to individuals from all such groups, appreciates the contributions of individuals from diverse backgrounds, and understands that diversity and inclusivity foster cooperation, acceptance, democracy, workplace safety, and the free expression of ideas essential to a robust academic community and the preparation of students for success in a global society.

The District understands, and reflects in this EEO Plan that the maintenance of a diverse and inclusive work and educational environment is an on-going process that requires sustained effort.

This EEO Plan shall also be regularly reviewed at least every three years and updated to ensure compliance with applicable federal and state laws.

Plan Component 4: Delegation of Authority, Responsibility and Compliance

It is the goal of the District that all employees promote and support equal employment opportunity because 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. ***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.*

2. ***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 ability to follow and implement the *Plan.*

3. ***Equal Employment Opportunity Officer***
   The District has designated the Chief Human Resources Officer 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, monitoring, and achieving the goals of 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 and Diversity Advisory Committee***
   The District has established the Equal Employment Opportunity and Diversity Advisory Committee to act as an advisory body to the equal employment opportunity officer and the district through the Human Resource Office to promote understanding and support of equal employment opportunity and diversity policies and procedures. The Equal Employment Opportunity and Diversity Advisory Committee 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 authorized organization or individual, whether or not an employee of the district, who acts on behalf of the Board of Trustees with regards 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.*

Plan Component 5: Advisory Committee

CCR, Title 5, § 53005
[See also ICCD Board Policy/Administrative Procedure 3410]

The District has established an Equal Employment Opportunity and Diversity Advisory Committee to assist the District in implementing its Plan and to advise the District on personnel matters relating to equal employment opportunities. The Equal Employment Opportunity and Diversity Advisory Committee will review staff demographic data and other relevant data for advising the District and assisting in its commitment and goals in achieving equal employment opportunities. The District Equal Employment Opportunity Officer will train the committee members on the requirements of the Title 5 regulations on equal employment opportunity (section 53000 et seq.) and the Plan. Composition of the Equal Employment Opportunity and Diversity Advisory Committee shall approximate a balance between employee groups and a student member, and shall include a diverse membership whenever possible.

This committee shall receive training each year in all the following: applicable title 5 regulations and state and federal nondiscrimination laws; the educational benefits of workforce diversity, and the identification and elimination of bias in hiring decisions; and the role of this committee in carrying out the District's EEO *Plan*. This committee shall hold a minimum of two (2) meetings per academic semester with additional meetings if needed to review EEO and diversity efforts, program, policies and progress.

Plan Component 6: Complaints

CCR, Title 5, §§ 53003(c)(2), 53026, and 59300 et seq.
[See also BCCD Board Policy/Administrative Procedure 3430]

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 EEO Plan that do not involve current hiring processes must be filed as soon as possible after the occurrence of an alleged violation and not later than ninety (90) days after such occurrence unless the violation is ongoing. A complainant may not appeal the District's determination pursuant to Title 5, 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 District level using the process provided by section 53026.

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 Chief Human Resource Officer who serves as the District Equal Employment Opportunity Officer. If the complaint involves the District Equal Employment Opportunity Officer, the complaint may be filed with the Superintendent /President. 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 District Equal Employment Opportunity Officer will forward copies of all written complaints to the State Chancellor's Office upon receipt.

The Equal Employment Opportunity Officer will forward copies of all written formal complaints to the State Chancellor's Office upon receipt.

If a complaint filed under Title 5, section 53026 alleges unlawful discrimination, it will be processed according to the requirements of Title 5, section 59300 et seq and the District complaint procedure in AP 3435.

The District has adopted separate policies and procedures for the processing of complaints alleging unlawful discrimination or harassment. These policies and procedures are located in the "*Board Policy/Procedure Section: General Personnel Administration BP 3410, 3420, 3430 and AP 3410, 3420, 3430, 3435* and on the District website at: http://www.imperial.edu

Student Complaint Procedure

A student who feels he/she has been or is being subjected to discriminatory treatment, including harassment, or who has learned of such unlawful discrimination, should immediately contact the office of the Vice President of Student Services, Title IX Coordinator or Deputy Coordinator, or

CHRO. If the complainant is not satisfied with the final decision, he or she may file a complaint with the CCCCO within 30 days of the administrative determination. The student can complete the form on the CCCCO website at http://californiacommunitycolleges.cccco.edu/ComplaintsForm.aspx.

The Imperial Valley College Student complaint process can be found in the current Imperial Valley College Catalog and AP 3435.

Plan Component 7: Notification to District Employees

CCR, Title 5, § 53003(c)(3)

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, administrators, the President of Academic Senate, Union Presidents, and members of the District Equal Employment Opportunity and Diversity Advisory Committee. The Plan will be available on the District's website, and when appropriate, may be distributed by e-mail.

Each year, the District will provide all employees with a copy of the Board's Equal Employment Opportunity Policy and Diversity Statement (located in Plan Component 3 of this Plan) and written notice summarizing the provisions of the District's Equal Employment Opportunity and Diversity 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 and;

(2) The locations where complete copies of the Plan are available, including the campus library, on the District's public internet and intranet sites, the Office of the Superintendent/President, the Office of Human Resources, Academic Services, Student Services, and Administrative Services.

Plan Component 8: Training for Screening/Selection Committees

Any organization or individual, 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; the elimination of bias in hiring decisions; and best practices in serving on a screening or selection committee. Persons serving in the above capacities will be required to receive training within the twelve (12) months prior to service on a screening/selection committee. This training is mandatory; individuals who have not received this

training will not be allowed to serve on screening/selection committees. The EEO Officer, and/or Human Resources staff are responsible for providing the required training. Any individual acting on behalf of the District with regards 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. This provision includes any individuals who are not employees of the District but are acting on behalf of the District.

The District has established a practice that equity training must be updated every two years after the representative's initial training. A tracking process has been established to track and monitor individuals who have been equity trained.

Plan Component 9: Annual Written Notice to Community Organization

CCR, Title 5, § 53003(c)(5)

The EEO Officer shall pursue a genuine and deliberate effort to distribute a written notice to appropriate community-based and professional organizations concerning this *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 website address where the district advertises its job openings and the name(s), department(s) and phone number(s) of individuals to call to obtain employment information. The district will actively seek to reach those institutions, organizations, and agencies that may be recruitment sources. A list of organizations, which will receive this notice, is attached to this Plan. This list may be revised from time to time as necessary.

Plan Component 10: Analysis of District Workforce and Applicant Pool

CCR, Title 5, § 53003(c)(6)

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 and to provide data needed for the reports required by this Plan. 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 data collection 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 committee and hiring administrator(s). The District will annually report to the Superintendent/President the results of its annual data collection. 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

District Workforce Analysis
EEO Data Collection Monitored Group Definitions:

GENDER IDENTIFICATION: The District requested employees to self-identify as **Female or Male**.

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 Alaska Native** (Not Hispanic or Latino) - A person having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.

The District will disaggregate the Asian category from one (1) Asian ethnic group identification to the following two (2) Asian ethnic group identifications:

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

-- **Native Hawaiian or Other Pacific Islander.** A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

The District understands that some persons may identify with multiple ethnic groups, but they shall be counted in only one ethnic group for reporting purposes. All persons will be asked to designate the ethnic group with which he or she most closely identifies.

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

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

"Major life activities" means functions such as caring for one's self, performing manual tasks, walking, seeing, hearing, taking, breathing, learning, and working.

EEO Data Collection Monitored Group Identification issue:

There are significant numbers of employees who decline to state their gender, ethnicity, or disability status with the District. The District shall try to accurately capture this information and encourages all persons to provide the above data but understands that this information is voluntarily collected and will not require employees to respond. The District shall distribute its EEO Identification Survey each year during the Fall Semester.

Historical data is provided in Appendix B and exemplifies the way future data shall be collected.

Component 11: Analysis of Degree of Underrepresentation and Significant Underrepresentation

Section 53003(c)(7) of Title 5 requires that, if the State Chancellor provides new availability data regarding job applicants, districts must analyze the degree to which monitored groups are underrepresented in comparison to their representation in the field or job category in which they are applying. The District EEO Office shall be responsible for developing procedures to implement this requirement when availability data becomes available.

Note: The limits placed on data analysis in this section do not affect the District's obligation to review and compare data regarding the District's own employees and applicants.

Plan Component 12: Methods to Address Underrepresentation

1. Underrepresentation based on availability data.

Section 53003(c)(8) of Title 5 requires EEO Plans to identify steps to be taken if the analysis pursuant to Section 53003(c)(7) and Component 11, reveals underrepresentation of a monitored group. Should the State Chancellor provide the availability data necessary to conduct this analysis, the District EEO Officer will be responsible for developing appropriate measures for addressing findings of underrepresentation and significant underrepresentation.

   a. Underrepresentation within the District's workforce and/or applicant pools. CCR, Title 5, §§ 53003(c)(9)

The District will review the information gathered pursuant to Plan Component 10, to determine if significant underrepresentation of a monitored group may be the result of non-job-related factors in the employment process. For the purposes of Plan Component 13, the phases of the

employment process include, but are not limited to, recruitment, hiring, retention and promotion. The information to be reviewed shall include, but need not be limited to:

1. Longitudinal analysis of data regarding job applicants, gathered pursuant to Plan Component 10, to identify whether over multiple job searches, a monitored group is disproportionately failing to move from the initial applicant pool, to the qualified applicant pool;

2. Analysis of data regarding potential job applicants, to the extent provided by the State Chancellor, which may indicate significant underrepresentation of a monitored group; and

3. Analysis pursuant to section 53003(c)(7) to determine whether the group is significantly underrepresented.

Plan Component 13: Additional Steps to Remedy Significant Underrepresentation

Where the above-described review identifies that significant underrepresentation of a monitored group may be the result of non-job-related factors in the employment process, the District shall implement additional measures designed to address the specific area of concern. These additional measures shall include the following:

1. Review its recruitment procedures and identify and implement any additional measures which might reasonably be expected to attract candidates from the significantly underrepresented group;

2. Consider various other means of reducing the significant underrepresentation which do not involve taking monitored group status into account, and implement any such techniques which are determined to be feasible and potentially effective;

3. Determine whether the group is still significantly underrepresented in the category or categories in question after the measures described in (1) and (2) have been in place for a reasonable period; and

4. 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:

    a. Any requirements of federal law; and

    b. Qualifications which the Board of Governors has found to be job-related throughout the community college system, including the requirement that applicants for academic and administrative positions demonstrate sensitivity to the diversity of community college students; or

5. Discontinue the use of any locally established qualification that has not been found to satisfy the requirements set forth in paragraph (4) of this subdivision;

6. Continue using qualification standards meeting the requirements of paragraph (4) of this subdivision only where no alternative qualification standard is reasonably available which would select for the same characteristics, meet the requirements of paragraph (4) and be expected to have a less exclusionary effect; and

7. Consider the implementation of additional measures designed to promote diversity that are reasonably calculated to address the area of specific need.

For the purposes of this Plan Component, "a reasonable period of time" means three years, or such longer period as the California Community Colleges Chancellor's Office may approve, upon the request of the Equal Employment Opportunity and Diversity Advisory Committee and the District Superintendent, where the District has not filled enough positions to appreciably affect its work force in the job category in question.

Plan Component 14: Additional Steps to Further Equal Employment Opportunity

Nothing in this Plan Component shall be construed to prohibit the District from taking any other steps it concludes are necessary to ensure equal employment opportunity, provided that such actions are consistent with the requirements of federal and state constitutional and statutory nondiscrimination law. These steps may include:

1) Having the Equal Employment Opportunity and Diversity 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) Increasing the advertising and recruitment budget for a three-year period to ensure that recruitment is broad and inclusive. Requiring that the responsible administrator for the division or department where the significant underrepresentation occurs develop, in conjunction with the equal employment opportunity officer, recruitment and hiring action plan to assist in addressing the significant underrepresentation. The action plan will include, but is not limited to:

    a. Additional locations or resources to advertise positions that would likely attract candidates from the significantly underrepresented groups;

    b. Promotion of curricular offerings that would assist in attracting candidates from significantly underrepresented groups;

    c. Additional training for current faculty and staff on the value of a diverse workforce;

    d. Recommended changes to the job announcement and screening criteria, including interview questions, which may reasonably be expected to attract candidates from the significantly underrepresented group.

    e. Focusing attention on its intern programs where graduate students will be provided the opportunity to co-teach a class offered by the district in the significantly underrepresented discipline.

f. Actively monitoring 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**:**

   i. 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.

   ii. 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.

   iii. Analyze the feasibility of significantly increasing the recruitment budget for another three years.

   iv. Develop a recruitment committee composed of the Superintendent/President, 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 and Diversity 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.

Plan Component 15: Reasonable Accommodations for Persons with Disabilities

CCR, Title 5, § 53025

Applicants and employees with disabilities 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 note takers.

Plan Component 16: Graduate Assumption Program of Loans for Education

The district will encourage community college students to become qualified for, and seek employment as, community college employees. The district shall research and inform students about programs that may assist them to complete their graduate studies and become community college employees. The district will post information on the campus concerning such programs, and make information available on the district's website, course catalog, and in locations accessible to students, including but not limited to, Counseling, Financial Aid, Admissions and Records, the Bookstore, and the Student Center. On a continuous basis, the district will genuinely make efforts to inform graduate students in local colleges and universities about the benefits of employment at a community college.

Plan Component 17: Annual Certification to Chancellor's Office

The Chief Human Resources Officer shall certify annually to the State Chancellor that it has timely completed with each of the following requirements of Title 5:

1. Recorded, reviewed and reported the data required regarding qualified applicant's pools and employee workforce
2. Reviewed and updated, as needed, the strategies component of the District's EEO Plan.
3. Investigated and appropriately responded to complaints alleging that the requirement of Title 5 Regulations pertaining to equal employment opportunities have been violated. And complaints alleging harassment and discrimination filed pursuant to Title 5 (commencing with section 59300).

Reference: Title 5, sections 53004, 53006, 53024.2 and 53026

Appendix A

Organizations for Annual Written Notice Per Plan Component 9

Ed Join

CCC Registry

Inside Higher Ed

Higher Ed Jobs

caljobs.ca.gov

Imperial Valley Press

Appendix A

Historical Demographic Data
Imperial Community College District (ICCD) Workforce Analysis:

The analysis of the District's current workforce and most recent application pools are reported in the following tables and charts. Provided below is a 2-year analysis of the Imperial Valley College workforce 2014-2015, 2015-2016.

Employee Type	Term	Total	Female	Male	American Indian/ Alaskan Native	Asian/ Filipino/ Pacific Islander	Black/ African American	Hispanic/ Latino	White/ Caucasian	Other/ Unknown Race
All Employees	**Fall 2015**	458	236/51.5%	222/48.5%	1/.2%	9/2.0%	8/1.7%	134/29.3%	90/19.7%	216/47.2%
	Fall 2016	451	235/52.1%	216/47.9%	1/.2%	9/2.0%	11/2.4%	141/31.3%	82/18.2%	207/45.9%
Exec/Admin	Fall 2015	10	1	9	0	1	1	2	5	1
	Fall 2016	12	2	10	0	1	2	3	3	3
Faculty Full-Time	Fall 2015	144	70	74	1	6	4	35	51	47
	Fall 2016	147	73	74	1	6	5	35	47	53
Faculty–Part-Time	Fall 2015	164	73	91	0	2	2	28	18	114
	Fall 2016	136	62	74	0	2	2	27	13	92
Classified	Fall 2015	140	92	48	0	0	1	69	16	54
	Fall 2016	156	98	58	0	0	2	76	19	59

Student Demographics	Term	Total	Female	Male	American Indian/ Alaskan Native	Asian/ Filipino/ Pacific Islander	Black/ African American	Hispanic/ Latino	White/ Caucasian	Other/ Unknown Race
Students Enrolled at Census	Fall 2015	8041	4608/57.3%	3378/42.1%	3/.04%	34/0.5%	54/0.7%	7329/91.2%	261/3.3%	360/4.5%
	Fall 2016	8096	4501/55.6%	3528/43.6%	7/0.1%	48/0.6%	92/1.1%	7328/90.5%	339/4.2%	282/3.5%

Imperial Valley Area Demographics	Year	Total	Female	Male	American Indian/ Alaskan Native	Asian/ Filipino/ Pacific Islander	Black/ African American	Hispanic/ Latino	White/ Caucasian	Two or More Races
Adult Population Age 18-65	2016	180,883	49%	51%	1%	1%	2%	84%	11%	1%

Gender Analysis – Overall, when comparing the gender distribution between Fall 2015 and Fall 2016, there were no substantial changes within employment types at ICCD. There are significant gender representation differences in the following employment types: 90% male for executive/administration and 62.3% female in classified. The total employee gender is representative of the student population at ICCD and with the community gender demographic of 2016.

Ethnicity Analysis – The ethnic analysis of employees and comparing to student body is not possible due to the large number of employees who have not identified or disclosed their ethnicity. The trends of ethnic groups at ICCD seem to be trending the right direction but until we can get more accurate data it is difficult to analyze and determine if there is any under representation or significant underrepresentation, especially in regard to the Hispanic/Latino group.

EEO Data Collection Monitored Group Identification:
The District understands that some persons may identify with multiple ethnic groups, but they shall be counted in only one ethnic group for reporting purposes. All persons will be asked to designate the ethnic group with which he or she most closely identifies.

Analysis of Applicant Pools
For 2014-2015, 2015-2016, 2016-2017 the overall percentages of applicants that submitted the voluntary survey are summarized below.

Imperial Community College District
Analysis of Applicant Pool
2014-2015

	Analysis	Percent		Analysis	Percent
TOTAL APPLICANTS	**320**	100%	**CAUCASIAN**	**63**	19.69%
MALE	**115**	35.94%	**AFRICAN AMERICAN**	**14**	4.38%
FEMALE	**207**	64.69%	**HISPANIC**	**209**	65.31%
GENDER NOT GIVEN	**-2**	-0.63%	**ASIAN/PACIFIC ISLANDER**	**13**	4.06%
DISABILITY	**9**	2.81%	**NATIVE HAWAIIAN/PACIFIC ISLANDER**	**0**	0.00%
VIETNAM VETERAN	**3**	0.94%	**AMERICAN INDIAN/ALASKAN**	**2**	0.63%
			ETHNICITY NOT GIVEN	**19**	5.94%
			TWO OR MORE RACES	**23**	7.19%

Imperial Community College District
Analysis of Applicant Pool
2015-2016

	Analysis	Percent		Analysis	Percent
TOTAL APPLICANTS	**879**	100%	**CAUCASIAN**	**189**	21.50%
MALE	**423**	48.12%	**AFRICAN AMERICAN**	**37**	4.21%
FEMALE	**426**	48.46%	**HISPANIC**	**525**	59.73%
GENDER NOT GIVEN	**30**	3.41%	**ASIAN/PACIFIC ISLANDER**	**82**	9.33%
DISABILITY	**36**	4.10%	**NATIVE HAWAIIAN/PACIFIC ISLANDER**	**4**	0.46%
VIETNAM VETERAN	**7**	0.80%	**AMERICAN INDIAN/ALASKAN**	**5**	0.57%
			ETHNICITY NOT GIVEN	**37**	4.21%
			TWO OR MORE RACES	**54**	6.14%

Imperial Community College District
Analysis of Applicant Pool
2016-2017

	Analysis	Percent		Analysis	Percent
TOTAL APPLICANTS	**327**	100%	**WHITE**	**76**	23.24%
MALE	**132**	40.37%	**BLACK**	**11**	3.36%
FEMALE	**195**	59.63%	**HISPANIC**	**217**	66.36%
GENDER NOT GIVEN	**0**	0.00%	**ASIAN/PACIFIC ISLANDER**	**9**	2.75%
DISABILITY	**12**	3.67%	**NATIVE HAWAIIAN/PACIFIC ISLANDER**	**1**	0.31%
VIETNAM VETERAN	**4**	1.22%	**AMERICAN INDIAN/ALASKAN**	**2**	0.61%
			ETHNICITY NOT GIVEN	**11**	3.36%
			TWO OR MORE RACES	**25**	7.65%

Because so many employees have not disclosed or identified an ethnicity it is not possible to analyze the ethnic demographics when compared to applicants. There is an under representation of Hispanic applicants when compared to the student body and the community demographics. There is a slight over representation of female applicants when compared to the employee, student and community demographics.