

Portland Community College
AFFIRMATIVE ACTION PROGRAM
for
MINORITIES AND FEMALES
2016

AFFIRMATIVE ACTION PROGRAMS

Plan Effective Date: 10/31/2016

Plan Expiration Date: 11/01/2017

AAP Administrator: Kim Baker-Flowers
Chief Diversity Officer

Approved by: Kim Baker-Flowers
Chief Diversity Officer

Establishment's Name: Portland Community College

Establishment's Address: 722 SW 2nd Avenue
Portland, OR 97204

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.

Portland Community College
AFFIRMATIVE ACTION PROGRAM FOR
MINORITIES AND FEMALES

TABLE OF CONTENTS

	<u>Page</u>
I. Establishment of Responsibilities for Implementation of the Written Affirmative Action Program	
(41 CFR 60-2.17(a))	1
A. Designation of Responsibilities of AAP Administrator (41 CFR 60-2.17(a))	1
B. The Responsibilities of the Company's Management to Ensure Implementation of the AAP (41 CFR 60-2.17(a))	2
II. Identification of Problem Areas (41 CFR 60-2.17(b))	2
III. Accomplishment of Prior Year Placement Goals	5
IV. The Development and Execution of Action-Oriented Programs	
(41 CFR 60-2.17(c))	6
V. Internal Audit and Reporting Systems (41 CFR 60-2.17(d))	7

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))

Kim Baker-Flowers, the Chief Diversity Officer, has the primary management responsibility, authority, and resources for ensuring full compliance with the provisions of E.O. 11246, as amended, and with implementing all applicable regulations. The Chief Diversity Officer's appointment and a description of the position's basic responsibilities have been communicated to all levels of personnel in the company. The responsibilities of the Chief Diversity Officer 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
 - c. 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 Portland Community College and enforcement agencies.

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

In implementing this written Affirmative Action Program, the responsibilities of the company's supervisors and managers working with the Chief Diversity Officer include, but are not necessarily limited to, the following:

1. Assisting in the identification of problem areas, formulating solutions, and establishing departmental goals and objectives when appropriate;
2. Reviewing 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; and
3. Reviewing the job performance of each employee to assess whether personnel actions are justified based on the employee's performance of his or her duties and responsibilities.

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

Portland Community College performs in-depth 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:

1. **Placement Goals:** An analysis of incumbency versus availability is performed to determine whether there are problems of minority and/or female utilization. Whenever a problem exists, as defined by a statistical methodology, Placement Goals are set (see the Placement Goals report which follows this section).

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:

- Working with hiring managers and recruiters to determine appropriate outreach to attract qualified applicant pools;
- Recruiting at colleges and universities with a significant percentage of minority and/or female students;
- Publishing job advertisements in newspapers and/or magazines that target minorities and/or females;
- Offering mentorship programs for minority and/or female employees;
- Offering job training to minorities and/or females currently employed by the company in order to increase their chances of advancement;

- Offering tuition reimbursement to employees to obtain training that will increase their chances of advancement;
 - Using recruitment companies that specifically target minorities and/or females; and
 - Continuing to use the services of the respective Employment Service Delivery System.
2. **Review of Employment Decisions:** A review of employment decisions is made 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.
 3. **Review of Hires/Promotions:** Whenever minorities and/or females are selected at a lower rate than non-minorities and/or males, a review of the applicant flow is conducted to determine possible reasons why minorities and/or females were not selected at a more favorable rate. If the company is attracting fewer than expected minorities and/or females that fit the qualifications for the job groups, good faith efforts will be put into place to attempt to improve the applicant flow of qualified minorities and/or females. If non-minorities and/or males are selected at a statistically significantly lessor rate than minorities and/or females, a review of the applicant flow and selection decisions is also made to ensure that there is no evidence of discrimination.
 4. **Review of Terminations:** For terminations, if minorities and/or females are being involuntarily terminated or are voluntarily leaving at a higher rate than non-minorities and/or males, a review of the employee files will be made to ensure the company is applying its policies and procedures for termination equally for protected as well as non-protected classes. If non-minorities and/or males have a statistically significant higher rate of termination than minorities and/or females, an investigation will also be conducted to determine the cause.
 5. **Compensation:** Compensation is reviewed at least annually in order to determine if there are significant discrepancies in pay when comparing female to male rates of pay and minority versus non-minority rates of pay. If discrepancies do exist, a thorough review is conducted to determine if the difference in pay is justified due to appropriate factors. If the difference in pay cannot be justified, Portland Community College will put a plan in place to bring pay into greater alignment.

Placement Goals Report

<u>Job Group</u>	<u>Class</u>	<u>Goal Placement Rate %</u>	<u>Goal Placement Number</u>
Administrative/Manager	Latino/Hispanic	8.06	1
Administrative/Manager	Asian	6.56	7
Administrative/Manager	American Indian/ Native Alaskan	0.78	1
Professional Non-Faculty	Black/African American	15.78	25
Professional Non-Faculty	American Indian/ Native Alaskan	1.04	3
Instructors FT	Female	73.55	82
Instructors FT	Black/African American	9.83	37
Instructors FT	Latino/Hispanic	8.49	9
Instructors FT	American Indian/ Native Alaskan	0.86	2
Instructors PT	Female	72.5	206
Instructors PT	Black/African American	2.24	1
Instructors PT	Latino/Hispanic	4.55	16
Instructors PT	American Indian/ Native Alaskan	0.82	5
Instructors PT	Native Hawaiian/ Pacific Islander	0.38	4
Counselors	Female	63.19	8
Counselors	Black/African American	17.87	3
Counselors	Latino/Hispanic	9.53	1
Counselors	Asian	3.35	1
Secretarial/Clerical	Native Hawaiian/ Pacific Islander	0.44	2
Skilled Craft	Latino/Hispanic	7.9	1
Service/Maintenance FT	Female	37.05	3
Service/Maintenance FT	Latino/Hispanic	21.62	12
Service/Maintenance FT	Native Hawaiian/ Pacific Islander	0.72	1
Service/Maintenance PT	Female	62.11	17
Service/Maintenance PT	Latino/Hispanic	14.85	7
Service/Maintenance PT	American Indian/ Native Alaskan	1.82	2

This assessment is based on the race and gender representation in the relevant labor area from which the college hires its employees.

The value weights for each factor may differ between job groups.

The methodology enables us to use national census data for the Administrator/Manager and Faculty job groups, and regional census data (Washington, Idaho, Oregon and California) for the Professional Non-Faculty job group. Moreover, the applicant flow data for faculty is further sub-divided to match each of the faculty subgroups: Instructors, Counselors and Librarians.

III. Accomplishment of Prior Year Placement Goals

Where goals were established for the prior year, the company 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. The results of the prior year's Affirmative Action Program are identified on the Goal Attainment report.

Goal Attainment Report

<u>AAP 2015</u>		<u>Employees</u>	<u>%</u>	<u>Goal</u>	<u>Goal</u>	<u>Actual</u>	<u>Actual</u>	<u>Progress</u>
<u>Job Group</u>	<u>Class</u>	<u>at</u>	<u>at</u>	<u>Placement</u>	<u>Placement</u>	<u>Placements</u>	<u>Placement</u>	
		<u>plan date #</u>	<u>plan date</u>	<u>Rate %</u>	<u>Number</u>	<u>Number</u>	<u>Rate %</u>	<u>%</u>
Administrative/Manager	Black	14	6.39	7.49	2	3	7.87	1.48
Administrative/Manager	Latino	11	5.02	8.06	7	5	7.40	2.38
Administrative/Manager	Asian	6	2.73	6.56	8	1	3.24	0.51
Administrative/Manager	AI/NA	1	0.46	0.78	2	0	0.46	0.00
Instructors	Female	982	56.02	73.34	304	-62	55.42	-0.60
Instructors	Black	36	2.05	8.32	110	-4	1.92	-0.13
Instructors	Latino	65	3.70	7.7	70	3	4.09	0.39
Instructors	AI/AN	6	0.34	0.85	9	1	0.42	0.08
Counselors	Black	1	4.16	17.87	3	0	4.55	0.39
Counselors	Latino	1	4.16	9.53	1	0	4.55	0.39
Service/Maintenance	Female	118	38.00	48.22	29	-4	38.25	0.25
Service/Maintenance	Latino	33	10.78	16.71	19	5	12.75	1.97

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:

1. Conducting annual analyses of job descriptions to ensure they accurately reflect job functions;
2. Making job descriptions available to recruiting sources and available to all members of management involved in the recruiting, screening, selection and promotion processes;
3. Evaluating the total selection process to ensure freedom from bias through:
 - a. Reviewing job applications and other pre-employment forms to ensure information requested is job-related;
 - b. Evaluating selection methods that may have a disparate impact to ensure that they are job-related and consistent with business necessity;
 - c. Training personnel and management staff on proper interview and selection procedures; and
 - d. Training on EEO and other related policies for management and supervisory staff.
4. Using techniques to improve recruitment and retention and to increase the flow of qualified applicants, including minority and/or female applicants, Portland Community College undertakes the following actions:
 - a. Includes 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. Places employment advertisements in local minority news media and women's interest media;
 - c. Disseminates information on job opportunities to organizations representing minorities and women and to employment development agencies when job opportunities become available;
 - d. Encourages all employees to refer qualified applicants;
 - e. Actively recruits at secondary schools, junior colleges, colleges and universities with predominantly minority and/or female enrollments; and
 - f. Requests employment agencies to refer qualified minorities and women.
5. Reviews company's compensation practices
6. Ensures that all employees are given equal opportunity for promotions and/or transfers. This is achieved by:
 - a. Posting opportunities internally;
 - b. Offering guidance to employees in identifying opportunities, training and educational programs to enhance promotions and opportunities for job rotation or transfer; and
 - c. Evaluating job requirements to ensure that they are appropriate.

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

The company believes that one of the most important elements in effectively implementing a written Affirmative Action Program is an adequate internal audit and reporting system. Through this system, the total program can be monitored for effectiveness, and management can be kept informed. Portland Community College's audit and reporting system is designed to:

1. Measure the effectiveness of the AAP/EEO program;
2. Document and analyze personnel activities;
3. Identify problem areas and develop action plans where remedial action is needed; and
4. Determine the degree to which AAP goals and objectives have been attained.

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:

1. Recruitment, advertising, and job application procedures;
2. Hiring, promotion, upgrading, layoff, recall from layoff;
3. Rates of pay and any other forms of compensation including fringe benefits;
4. Job assignments, job classifications, job descriptions, and seniority lists;
5. Sick leave, leaves of absence, or any other leave;
6. Training, attendance at professional meetings and conferences; and
7. Any other term, condition, or privilege of employment.

The following documents may be maintained as a component of Portland Community College's internal audit process:

1. An applicant flow log;
2. Summary data of external job offers and hires, promotions, resignations, terminations;
3. Summary data of applicant flow;
4. Employment applications; and
5. Records pertaining to company's compensation system and decisions.

Portland 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 significant rejection ratios, 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.