



**Fox Valley Technical College  
Affirmative Action / Equal Opportunity**

**Five-Year Plan  
2014 – 2019**

———— *July 1, 2014 – June 30, 2019*

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## Introduction

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The mission of Fox Valley Technical College is “To provide high-quality education and training that support student goals, a skilled workforce, and the economic vitality of our communities.” “We value an educational environment that attracts and supports a diverse student/staff community and fosters global awareness.”

Fox Valley Technical College reaffirms its commitment to actively implement and monitor federal, state and Wisconsin Technical College System Board equal opportunity and affirmative action laws, executive orders, plans, rules, and regulations.

The Fox Valley Technical College Board, Administrators, Faculty and Staff recognize diversity in our students, staff and workforce and continue to support an educational climate that values equal employment and educational opportunities for its employees and students in all programs and educational activities.

## Affirmative Action / Equal Opportunity Goals

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1. Balance individual occupational program enrollment percentages for students by race, sex and disability percentages in the general population.
2. Assure non-discrimination in career planning, counseling and placement services for students.
  - Analyze and report demographic, program enrollment and completion and job referral and placement data for minorities, women and disabled students and take steps to assure nondiscrimination in referral and placement services.
3. Analyze and address employment of faculty and staff within each district in the Wisconsin Technical College System to match availability percentages for race, sex and disability categories in the general population.
  - Implement a plan for recruiting and hiring minorities, women and disabled faculty and staff in all employment categories where there is under representation.
4. Create an educational and work environment that reflects, appreciates and celebrates the diverse society and community in which we live and one that creates a climate for the success of every person by appreciating the uniqueness that they bring to the technical college district.
  - Implement faculty and staff in-service programs, professional development activities, mentoring and student orientation programs to promote cultural, sex and disability awareness and sensitivity.
  - Integrate the history, culture, accomplishments and contributions of minorities, women and the disabled into curricula at each WTCS district.
  - Insure that cultural competency is practiced at every campus.

# SECTION I

## Notification of Compliance

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### **Notification of Compliance**

Fox Valley Technical College does not discriminate on the basis of race, color, national origin, sex, disability or age in employment, admissions or its programs or activities. Fox Valley Technical College offers degrees, diplomas, apprenticeships and certificates in: Agriculture, Horticulture, Natural Resources, Aviation, Business, Management, Finance, Construction, Culinary & Hospitality, Engineering & Electronic Related Technologies, Health Science, Human Services, Information Technology, Law Enforcement, Public Safety, Manufacturing, Marketing, Sales & Service, Printing Technologies, Transportation, and General & Individualized Studies. Admissions criteria vary by program and is available by calling our Admissions Office at 920-735-4708. The following person has been designated to oversee Title IX of the Education Amendments of 1972 and Section 504 of the Rehabilitation Act of 1973 and to handle inquiries regarding the College's nondiscrimination policies: Patti Jorgensen, AA/EEO Officer, FVTC Appleton Main Campus, Office E116, 920-735-5649, [jorgensp@fvtc.edu](mailto:jorgensp@fvtc.edu).

### **Notificación de Conformidad**

Fox Valley Technical College (El Colegio Técnico Fox Valley) no discrimina con base en raza, color, origen nacional, sexo, incapacidad o edad en cuanto al empleo, admisiones o en sus programas o actividades. El Colegio Técnico Fox Valley ofrece licenciaturas, diplomados, cursos de aprendizaje y certificados en: Agricultura, Horticultura, Recursos Naturales, Aviación, Negocios, Administración, Finanzas, Construcción, Culinaria y Hospitalidad, Tecnologías relacionadas con Ingeniería y Electrónica, Ciencias de Salud, Servicios Humanos, Informática, Fuerza Pública, Seguridad Pública, Fabricación, Mercadeo, Ventas y Servicios, Tecnologías de Imprenta, Transporte y Estudios Generales e Individualizados. El criterio de admisión varía de acuerdo al programa y está disponible llamando a nuestra Oficina de Admisiones al 920-735-4708. La siguiente persona ha sido designada para supervisar el Título IX de Enmiendas de Educación de 1972 y la sección 504 del Acto de Rehabilitación de 1973 y para encargarse de las preguntas en cuanto a las pólizas de no discriminación del colegio: Patti Jorgensen, Oficial para la Acción Afirmativa/ la Igualdad de Oportunidades de Empleo, Fox Valley Technical College, Campus Principal, Appleton Oficina E116, (920) 735-5649. [jorgensp@fvtc.edu](mailto:jorgensp@fvtc.edu).

### **Kev Ceeb Toom Raws Txoj Cai**

Fox Valley Technical College yuav tsis cais pab pawg neeg twg, neeg nqaij tawv txawv, neeg txawv teb chaws, pojniam/txivneej, neeg puas lub cev tuag tes tuag taw, lossis hnuv nyoog, rau txoj kev ntiav los ua haujlwm, kev tuaj kawm ntawv, lossis tuaj koomtes rau tejyam kev uasi nyob hauv tsev kawm ntawv. Fox Valley Technical College muaj kev kawm ntawv thiab kawm haujlwm ntiav rau: Ua Liaj Ua Teb, Cog Paj Ntoov, Saib Hav Zoov, Ya Dav Hlau, Ua Lag Luam, Los Tuav Khiav Dej Num, Khaws Nyiaj Txiag, Ua VajTsev, Ua Noj Haus & Tos Txais Qhua, Kawm Muab Qauv Ua Tshuab thiab Hluav Taws Xob, Kho thiab Tu Cov Mob, Ua Haujlwm Nrog Neeg, Cov Lus Txheejtseeb Ntawm Kev Siv Txujci Los Tsim Nyuag Ub Nyuag No, Ua Tub Ceev Xwm, Xyuas Xim Rau Tsoom Fwv, Ua Khoom Siv, Nrhiav Khoom Muag, Muag Khoom & Pab Cuam, Luam Ntawv, Kev Mus Los thiab Kho Tshab, thiab Kawm Ntawv Rau Txhua Tus. Txoj kev tuaj nkag kawm cov haujlwm no kuj sib txawv. Yog koj xav paub ntxiv hu rau lub chaw ua haujlwm txais neeg kawm ntawv (Admissions Office) ntawm (920) 735-4708. Tus neeg nram qab no tau raug tsa saib txog txoj cai ntawm phab kev kawm ntawv Title IX of the Education Amendments of 1972 and Section 504 of the Rehabilitation Act of 1973 thiab teb tej lusnug ntsig txog Tsev Kawm Ntawv txoj cai tivthaiv kev ntxubntxaug: Patti Jorgensen, AA/EEO Officer, FVTC Appleton Main Campus, Office E116, 920-735-5649, [jorgensp@fvtc.edu](mailto:jorgensp@fvtc.edu).

# SECTION I

## Policy Statement

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### Administrative Policy Type: Human Resources

#### Policy Title: Equal Opportunity

- Equal Opportunity and Affirmative Action
- Religious Accommodations – Employees & Applicants for Employment
- Harassment
- Discrimination Complaint Procedure – Employees

#### Introduction

The following policies are intended to comply with all applicable state and federal laws, as well as to express the district board's commitment to the principles of equal opportunity for all.

1. **Legal Basis:** The district will seek continuous compliance with the following laws: Titles VI and VII of the Civil Rights Act of 1964 as amended; Equal Pay Act of 1963 as amended; Age Discrimination in Employment Act of 1967 and 1975; Title IX of Education Amendments of 1972; Section 504 of the Rehabilitation Act of 1973; the Vocational Education Amendments of 1976; Civil Rights Restoration Act of 1987; Civil Rights Act of 1991; Carl D. Perkins Vocational Career and Technical Education Act; Americans With Disabilities Act of 1990; Wisconsin Fair Employment Law; Sec. 38.23 *Wis. Stats.*; and the Office for Civil Rights Guidelines for the Elimination of Discrimination in Vocational Education.
2. **Scope:** Equal opportunity within the scope of these guidelines is for employees, applicants for employment, students, and the general public without regard to political affiliation, age, race, creed, color, disability, marital status, sex, pregnancy, national origin, ancestry, religion, sexual orientation, arrest or conviction record, service in the armed forces, genetic testing, and the use or non-use of lawful products off the District's premises during non-working hours. Retaliation is a form of discrimination, and as such is prohibited. The District Board of Trustees recognizes that equal employment opportunity is a legal, social, and economic necessity to the District.

The District commits itself to a continuing program to assure that unlawful discrimination does not occur in the services it renders to the public.

3. **Affirmative Action:** Affirmative Action will be taken to achieve a work force which includes an appropriate balance of racial/ethnic groups, women, and the disabled for all permanent full-time positions. In developing and implementing this Plan, the College has been guided by its policy of providing equal employment opportunity. As a part of its affirmative action plan, the College has established goals. These goals are not intended to be rigid, inflexible quotas, but instead are intended to be targets reasonably attainable by applying good faith efforts. The use of goals and timetables in this plan is not intended to discriminate against any individual or group of individuals with respect to any employment opportunity for which they may be qualified. Instead, these goals are a mechanism to effectuate the principles of equal employment opportunity and affirmative action.
4. **Employment Practices:** It is the policy of the District not to discriminate against qualified applicants or employees. Fox Valley Technical College will comply fully with applicable Federal Equal Opportunity and Affirmative Action Laws, Executive Orders and Regulations and Wisconsin laws including, but not limited to, Section 111.31-111.52, *Wis. Stats.* The policy of non-discrimination includes appropriate affirmative action to implement the goals of the policy.

The principles and concepts of Affirmative Action will be integrated into all employment practices including, but not limited to, recruiting, hiring, transfers, promotions, training, compensation, benefits, layoff, termination, retention, certification, testing, and committee appointment.

5. **Responsibility:** Ultimate responsibility for Affirmative Action rests with the President. Responsibility for implementing the Equal Opportunity and Affirmative Action Program rests with the District Affirmative Action/EEO Officer. However, managers and staff share responsibility for the success of the program.
6. **Harassment:** Harassment of and by employees and students on the basis of the above mentioned personal attributes is an illegal practice and is prohibited by policy. Appropriate corrective measures will be used to eliminate harassment pursuant to the college harassment policy.
7. **Complaint Procedure:** The Discrimination Complaint Procedure is utilized to process charges of discrimination that violate these policies. Copies of this procedure can be obtained from the Affirmative Action/EEO Officer.
8. **Disability Accommodations:** Reasonable accommodations will be provided for disabled persons to ensure their access to employment and educational programs. The District strives to provide physical accessibility to all learning and workstations consistent with reasonable accommodations.
9. **Religious Accommodations:** In response to an employee's request, reasonable accommodation will be provided for religious observances and practices.
10. **Vendors:** The District will seek assurance from all contractors and suppliers of products and services that they do not discriminate. The District Board also encourages the purchase of products and services from women, minority, and disabled business owners.
11. **Role of Affirmative Action/EEO Officer:** The District Affirmative Action/EEO Officer is responsible for developing and implementing the Affirmative Action Plan, and monitoring compliance. Responsibilities of the Officer include: developing a written Affirmative Action Plan, monitoring internal and external communication procedures, collecting and analyzing employment and student data, identifying problem areas, setting goals and timetables, developing and implementing programs to eliminate discriminatory practices, designing and implementing an internal monitoring system, and submitting compliance plans and reports to the Wisconsin Board Affirmative Action/EEO Officer.

Violation of this policy or the Affirmative Action Plan will result in appropriate corrective action.

**Contact Person:** The Affirmative Action/EEO Officer reports to the President to assure implementation of the Affirmative Action Plan. Questions regarding affirmative action or equal opportunity shall be directed to: Dr. Patricia Jorgensen, Affirmative Action/EEO Officer, P.O. Box 2277, 1825 North Bluemound Drive, Appleton, WI 54912-2277. Telephone (920) 735-5649 or Janet Case, Title IX Coordinator, Telephone (920) 735-2497.

#### **RELIGIOUS ACCOMMODATIONS—EMPLOYEES AND APPLICANTS FOR EMPLOYMENT**

Consistent with sincerely held religious beliefs, it is the policy of Fox Valley Technical College to afford employees and applicants for employment the opportunity to observe religious holidays/practices. Several holidays are paid as a matter of contract(s) obligation and are identified in the FVTC operating calendar.

FVTC will make reasonable accommodations for religious observances and practices of employees and applicants for employment, unless such accommodation would pose an undue hardship on the College. Work schedules will be adjusted to permit an employee time off for religious observances. Employment interviews and testing sessions will be adjusted by the college to accommodate religious preferences.

Employees are encouraged to make up their time off for religious holidays. However, if mutually agreed upon by employee and immediate supervisor, the observance of religious holidays may be paid by use of emergency leave up to the maximum allowed by contract/policy. Time off will be considered upon request at least five (5) work days in advance of the observance. The request must be addressed to the employee's supervisor. Certification of religious affiliation may be required.

## **HARASSMENT**

The Fox Valley Technical College District Board is committed to be in compliance with present law and guidelines prohibiting harassment in education and employment.

Harassment by supervisors, co-workers, students, or visitors on campus on the basis of race, sex, national origin, disability, or other protected status is a practice prohibited by the Fox Valley Technical College District Board.

Fox Valley Technical College will respond to sexual harassment that initially occurred off school grounds, (or even) outside of an employment setting, a college education program, or activity. Conduct that occurs off campus can be the subject of a complaint or report and will be evaluated to determine whether it violates this policy, e.g. if off-campus harassment has continuing effects and/or that create a hostile environment on campus. Allegations of off-campus sexual misconduct should be brought to the college's attention.

**Harassment:** Harassment includes any of the verbal/physical conduct listed below which is based on the protected status of the individual:

- Derogatory comments, jokes or slurs, physical harassment including unwanted contact, assault, impeding, or blocking movement, or any interference with activity appropriate in the workplace that have the purpose or effect of creating an intimidating, hostile, or offensive work environment, or which substantially interferes with the employee's work performance.
- Visual harassment including derogatory posters, cartoons, or drawings that have the purpose or effect of creating an intimidating, hostile, or offensive work environment or which substantially interferes with the employee's work performance.
- Sexual harassment includes unwelcome sexual advancements, unwelcome physical contact of a sexual nature, or unwelcome physical or verbal conduct of a sexual nature, the submission to which is either explicitly or implicitly a term or condition of the individual's employment or whenever submission to or rejection of such conduct is used as the basis for employment decisions. Sexual/gender harassment may also be found where the conduct creates an intimidating, hostile, or offensive work environment or which substantially interferes with an employee's work.

*Sexual Harassment* includes *sexual violence*, an extreme form of hostile environment defined as:

Physical sexual acts perpetrated against a person's will or where a person is incapable of giving consent due to the victim's use of drugs or alcohol. An individual may also be unable to give consent due to an intellectual or other disability. A number of different acts fall into the category of sexual violence, including rape, sexual assault, sexual battery, and sexual coercion. All such acts of sexual violence are forms of sexual harassment covered under Title IX.

No employee shall be punished or penalized for rejecting or objecting to behavior that might be considered as sexual harassment including, but not limited to, the following examples:

- Sexual gestures with hands or body movement.



- Unnecessary and unwanted touching, grabbing, caressing, pinching, or brushing up against a person.
- Staring at a person or looking a person up and down
- Whistles, catcalls, and sexual references
- Repeated pressure on an employee to socialize with or date another individual
- Asking personal questions about a person's social or sexual life
- Making sexual comments or innuendoes, telling jokes or stories of a sexual demeaning offensive or insulting nature
- Deliberate display of offensive, sexually graphic material which is not necessary for business purposes
- Posters, cartoons, photographs or art work of a sexual, hostile, or degrading nature
- Granting or withholding pay increases, promotions, job offers, or other employment issues based on sex

Harassment may also include:

- Engaging in criminal conduct or acts of violence, or making threats of violence toward anyone on employer premises or at any time for any purpose; fighting, or horseplay or provoking a fight on employer property, or negligent damage of property
- Threatening, intimidating, or coercing fellow employees on or off the premises – at any time, for any purpose
- Malicious gossip and/or spreading rumors; engaging in behavior designed to create discord and lack of harmony; interfering with another employee on the job; willfully restricting work output or encouraging others to do the same

Conduct which might be offensive to some individuals might be considered inoffensive by others. Because of this, it is difficult for managers or supervisors to learn of and take effective action to halt harassment unless the affected individual alerts a manager or supervisor both to the occurrence and the fact that the conduct in question is offensive or unwanted.

Several options are available. If an employee feels she/he has been subjected to or witnessed harassment of any kind, even if she/he considers it minor, the College needs your cooperation to make this policy as effective as possible. The College encourages you to approach the alleged harasser and ask him/her to immediately stop the offensive activity. The alleged harasser may not know how you or others feel. This step is **not required** if it makes you feel uncomfortable or is not effective.

**Complaint Procedure:** Whether or not the harasser has been confronted, if an employee believes that harassment by any person including, but not limited to, co-worker, supervisor, vendor, or guest of the College has occurred or if an employee believes they have witnessed harassment or threats to a safe environment, the employee is strongly encouraged to report the facts of the incident and the names of the individual(s) involved within forty-eight (48) hours, if at all possible, to any of the following individuals: the employee's supervisor, any other supervisor, a member of the Human Resources staff, or directly to Affirmative Action/EEO Officer at (920) 735-5649 or [jorgensp@fvtc.edu](mailto:jorgensp@fvtc.edu). **You are required, however, to report the harassment to somebody in management.** Prompt reporting will assist the College in

conducting a thorough and timely investigation. Harassment situations can be sensitive. The College will investigate all allegations promptly, thoroughly and fairly; and will ensure confidentiality to the extent possible.

The College treats all claims of harassment seriously. The College representative conducting the investigation shall obtain a complete and clear statement of the alleged acts from the complainant, shall obtain names and statements from witnesses, and shall obtain a clear and complete statement from the alleged harasser/accused employee. All employees are required to cooperate fully in any investigation.

The College representative conducting the investigation shall maintain full documentation during the investigation, including the complaint, all statements, documents, notes, and other information relevant to the complaint.

All employees are responsible for helping to assure that harassment or threats to safety do not occur. The College forbids retaliation against anyone who has legitimately reported harassment or unsafe conditions or anyone who participates in an investigation. Anyone who engages in or assists in such retaliatory actions will be subject to disciplinary action up to and including the termination of employment.

**Resolution:** The College's policy is to investigate all such complaints thoroughly and promptly. To the fullest extent practicable and consistent with Wisconsin statutes, the employer will keep complaints and terms of their resolution confidential. If an investigation confirms that harassment or unsafe conditions have occurred, the employer will take appropriate corrective action including discipline up to and including immediate termination of employment to prevent recurrence of the conduct and to correct its effects.

## **DISCRIMINATION COMPLAINT PROCEDURE EMPLOYEES**

### **Introduction**

The College has adopted a procedure to address complaints of discrimination prohibited by several federal and state laws on the basis of political affiliation, age, race, creed, color, disability, marital status, sex, national origin, ancestry, religion, sexual orientation, arrest or conviction record, service in the armed forces, genetic testing, and the use or non-use of lawful products off the District's premises during non-working hours.

Use of these procedures is encouraged to afford the Complainant and the College the opportunity to promptly address and resolve complaints at the lowest level. Use of the procedures does not preclude the right of a person to also file complaints with the State of Wisconsin Department of Workforce Development, the Office for Civil Rights, the U.S. Equal Employment Opportunity Commission, or the U.S. Wage and Hour Division in the Department of Labor. Most anti-discrimination laws have a time limit of from one hundred eighty (180) to three hundred (300) days during which an individual may file a complaint. The College reserves the right to determine whether a complaint appropriately falls within the scope of this policy.

### **I. Definitions**

- A. **Complaint:** Complaint means an allegation of personal discrimination or harassment on the basis of political affiliation, age, race, creed, color, disability, marital status, sex, national origin, ancestry, religion, sexual orientation, arrest or conviction record, service in the armed forces, genetic testing, and the use or non-use of lawful products off the District's premises during non-working hours in regard to any employment, procedure, or practice of this District.

This policy applies when a member of the College community ('complainant' as defined below) believes that he or she has been subjected to harassment or discrimination by an instructional, administrative, or faculty member ('respondent'), provided that at least a substantial portion of the alleged wrongful behavior either occurred on College-controlled, College-leased or College-owned property, or otherwise had a significant connection to the activities of the College.

- B. **Complainant:** Complainant means any of the following who have a personal complaint based on their protected status as defined:
  - 1. An employee, permanent, project, or limited term, of Fox Valley Technical College.
  - 2. An employee or group of employees of Fox Valley Technical College submitting a complaint all of whom have indicated, in writing, his/her willingness to be part of the complaint.
  - 3. An applicant for employment with Fox Valley Technical College.
  - 4. Any other person not covered by the above definition will be referred to the appropriate civil authorities.
- C. **Respondent:** Respondent means a person and/or persons alleged to be responsible, or who may be responsible for the violation alleged in a complaint. The term may be used to designate persons with direct responsibility for a particular action or those areas covered in the complaint.
- D. **Affirmative Action/EEO Officer:** The employee designated by the Fox Valley Technical College District Board who has the responsibility of coordinating the internal complaint procedure.
- E. **Days:** All days listed in this policy are regular business days when the College is open for business. Weekends, holidays, and days when the campus is closed for business are excluded.

## II. Informal Complaint Procedure

- A. A complainant shall, within thirty (30) days of the date of the action causing the complaint, contact the Affirmative Action/EEO Officer. If the subject of the complaint is the Affirmative Action/EEO Officer, then the complainant shall contact the Title IX/Gender Equity Coordinator who will then administer this informal complaint procedure.
- B. The informal complaint may be verbal or in writing. The complainant shall provide full and complete information on the facts underlying the complaint.
- C. The Affirmative Action/EEO Officer shall inform the complainant of his/her rights under federal and state law.
- D. The Affirmative Action/EEO Officer shall determine if the complaint is valid under the established complaint procedure. Validity does not mean whether or not an unfair act has occurred but whether or not the action underlying the complaint is within the scope of the complaint procedure.
- E. Upon receipt of the complaint, the Affirmative Action/EEO Officer shall determine whether this policy applies. A decision by the Affirmative Action/EEO Officer that this policy does not apply is not final and may be appealed to the president within seven (7) days. By way of example, the Affirmative Action/EEO Officer shall find that this policy does not apply upon determining any of the following:
  - 1. That even if the complainant's allegations are true, the respondent's conduct would not constitute harassment or discrimination as defined in this policy.
  - 2. That the alleged conduct did not occur on College-owned, College-leased, or College-controlled property or did not otherwise have a significant connection to the activities of the College.
  - 3. That the complainant is not a College member as defined in this policy.
  - 4. That the complainant was not the party harmed by the discrimination or harassment.

This list is not exclusive, and other situations may result in the Affirmative Action/EEO Officer determining that the policy does not apply.

- F. If the Affirmative Action/EEO Officer determines that this policy applies, the Affirmative Action/EEO Officer shall conduct an investigation of the complaint in any manner the Affirmative Action/EEO Officer deems appropriate. Not later than fifteen (15) days after the complaint commencement date, the Affirmative Action/EEO Officer shall provide the Vice President of Administrative Services the complainant, and the respondent with a report of the Affirmative Action/EEO Officer's actions and findings.
- G. If the Affirmative Action/EEO Officer finds that the evidence does not justify such a preliminary finding of violation, the Affirmative Action/EEO Officer will dismiss the complaint. A decision by the Affirmative Action/EEO Officer that the evidence does not justify such a preliminary finding of violation may be appealed by the complainant to the Vice President of Administrative Services within seven (7) days by presenting a written complaint as set forth in this policy. If no complaint is timely filed, the complaint will be dismissed, and the complainant, respondent and Vice President of Administrative Services will be notified.
- H. At any point in the investigation, the Affirmative Action/EEO Officer may attempt to conciliate the informal complaint through contact with all parties involved. Any agreement reached as a result of conciliation shall be in writing and signed by all parties involved.
- I. In the event that a violation is found, the Vice President of Administrative Services shall take prompt, effective, and affirmative action to remedy the situation and ensure compliance with the policy.

### **III. Formal Complaint Procedure**

#### **A. Step One**

1. Within seven (7) days of the failure of conciliation or a finding of no violation, whichever occurs first, the complainant may file a written request for hearing with the Affirmative Action/EEO Officer. If the subject of the complaint is the Affirmative Action/EEO Officer, then the complainant may file a written request for hearing with the Title IX/Gender Equity Coordinator who will then serve in the role of the Affirmative Action/EEO Officer for this formal complaint procedure. Failure to meet this time requirement will cause the dismissal with prejudice of the complaint.
2. The written complaint shall be a clear, concise statement indicating the issues involved, the date the incident or violation took place and the relief sought.
3. Within seven (7) days of the receipt of the written request for hearing, the Affirmative Action/EEO Officer shall forward a copy to the respondent(s) and the Vice President of Administrative Services.
4. Within seven (7) days of the receipt of the written complaint, the Vice President of Administrative Services shall schedule such meeting(s) with complainant, the respondent, and the Affirmative Action/EEO Officer as are necessary to hear the complaint. The Vice President of Administrative Services shall return a written answer to the complainant within seven (7) days.
5. If the complainant is dissatisfied with the Vice President's answer, the complaint may be appealed to step two.

#### **B. Step Two**

1. The complainant may file an appeal of the Vice President's answer at step one within seven (7) days. Within seven (7) days of the receipt of the appeal, a Complaint Committee shall be formed to review the complaint, receive testimony and make recommendations to the President. This committee serves as the President's hearing panel.
2. The Complaint Committee shall be selected from the Affirmative Action Committee.
3. The Committee shall consist of four members selected as follows:
  - a. One member selected by the complainant
  - b. One member selected by the respondent(s)
  - c. One member appointed by the President
  - d. The Affirmative Action/EEO Officer shall serve as Executive Secretary of the committee, but shall not vote.
4. A hearing date shall be scheduled within fourteen (14) days of the appointment of the Complaint Committee.
5. The committee shall select a Chairperson.
6. Before the hearing, the Complaint Committee shall participate in an orientation session provided by the Affirmative Action/EEO Officer or her/his designated representative. The orientation will include a review of federal and state anti-discrimination legislation and related guidelines as well as relevant college documents or policies.
7. Persons present at the hearing shall include the Complaint Committee complainant, the respondent(s), any representative(s) of either the complainant of the respondent, and, unless sequestered by the Complaint Committee, any individual requested by either party to provide information relevant to the evaluation of the complaint. The hearing will be closed to the public.
8. Both the complainant and the respondent shall have the right to present such witnesses as they deem necessary to develop the facts pertinent to the complaint. The complainant and respondent shall have the right to ask questions of any person participating in the hearing.
9. Formal rules of evidence shall not be applied at the complaint hearing. To the greatest extent possible, the hearing shall be conducted in an informal manner. The objective of the hearing is to facilitate the understanding of the facts by the Complaint Committee. It is not intended that either party be surprised at the hearing by the appearance or testimony of any witness. Therefore, the Affirmative Action/EEO Officer may require that the respondent and the complainant provide written pre-hearing statements to the Complaint Committee and the other parties, setting forth the name of witnesses and the nature of their anticipated testimony. The Complaint Committee may adopt any procedures for the hearing as may further the intent of this policy.
10. Neither party shall be permitted to introduce information not presented at Step One, unless she/he can show cause as to why it was not introduced in Step One.
11. The Complaint Committee shall make written notification of its findings to the President within seven (7) days after the hearing. The findings shall include the

committee's determination regarding the validity of the complaint and its recommendations for any necessary corrective action, as well as a statement of the reasons on which the findings were made. After deliberation, if a majority of Complaint Committee members do not determine that a preponderance of probative, reliable, and substantial evidence justifies a finding that the respondent has violated the policy prohibiting harassment or discrimination, the complaint shall be terminated. The Complaint Committee will notify the Affirmative Action/EEO Officer, who will notify the complainant, the respondent, the Vice President of Administrative Services, as well as the President. The Complaint Committee's decision to terminate the complaint may be appealed.

12. All findings and recommendations of the hearing panel shall be determined by majority vote. Any committee member in disagreement with the majority shall have the option of preparing a dissenting opinion.

#### **C. Step Three**

1. The President shall review the written recommendations of the Complaint Committee and issue a written decision within fourteen (14) days of the date of the recommendations.
2. Prior to this decision, the respondent and the complainant may present written arguments to the President.
3. The President's decision shall include a statement regarding the validity of the complaint allegation and a specification of any corrective action to be taken, if any.

#### **D. Final Decision**

1. The complainant may appeal the decision of the President to the Fox Valley Technical College District Board.
2. The grounds of the appeal are limited to the following:
  - a. New evidence that was not reasonably available until after the hearing.
  - b. The complainant was denied due process because of failure to follow the procedures set forth in this policy, and such failure affected the outcome in a manner detrimental to the complainant.
3. Written notice of appeal and the grounds therefore must be made within thirty (30) days of the date of the President's decision. Written notice of appeal and the grounds therefore must be sent to the Chair of the Fox Valley Technical College District Board.
4. The decision of the board shall be based on the record developed to that point and is limited to one of the following actions:
  - i. Confirmation of the findings of the President.
  - ii. A finding of no discrimination or harassment and dismissal of the complaint.
  - iii. Remanding the matter to the Affirmative Action/EEO Officer for further investigation and/or hearing pursuant to this policy.
5. The decision of the Fox Valley Technical College District Board shall constitute the final decision issued on any complaint.

#### **IV. Restrictions**

- A. No action relating to employment, termination, transfer, demotion, or rates of pay can be taken until the complaint has been resolved, unless such action is decided necessary to the well-being of the complainant and/or to the function of Fox Valley Technical College.

- B. Neither the complainant nor the respondent shall arbitrarily delay action of the complaint procedure.
- C. All procedures and hearings shall be closed session.
- D. It is not intended that the outcome of a complaint be determined by a nonsubstantial procedural violation. Therefore the Affirmative Action/EEO Officer, the Complaint Committee, or the President may make exceptions to the provisions (including time deadlines) of this policy; provided, however, that any exception is intended to bring about a just outcome, is relatively minor in nature and does not unreasonably adversely affect another participant in the process.
- E. All participants in all proceedings under this policy will observe confidentiality to the extent reasonably possible. However, in the event of any final determination of a violation of this policy, the President will provide appropriate information to appropriate officials. The College may also use any information obtained in the proceedings to defend itself against any claims, complaints, or allegations brought against it or as may be required by law.

**V. Extension of Time**

Any time limits set by this procedure may be extended by mutual written consent of the complainant(s) and the respondent(s).

**VI. Information**

The Fox Valley Technical College District shall provide complainants and respondents, with access to copies of anti-discrimination laws and regulations, as well as relevant Fox Valley Technical College policies.

**VII. No Retaliation**

No person shall be subjected to discharge, suspension, discipline, harassment, or any form of discrimination for having utilized or having assisted others in the utilization of the complaint process.

**VIII. Maintenance of Records**

- A. The Complaint Committee hearing shall be recorded. Such recording shall be made available to the complainant(s) and the respondent(s) at their request. Such recordings shall be maintained for a minimum period of three (3) years after resolution of the complaint.
- B. Records shall be kept of each complaint in the office of the Affirmative Action/EEO Officer. These shall include, at minimum: the name of the complainant and her/his position at Fox Valley Technical College District; the date of complaint filing; the specific allegation made in the complaint and any corrective action requested; the names of respondents; the levels of processing and the resolution, dates; hearing committee members; a summary of the major points, facts and evidence presented by each party to complaint; and a statement of the final resolution and the nature and date of any corrective action taken. Such records shall be maintained on a confidential basis.
- C. All written complaint records shall be maintained for a minimum of three (3) years after the complaint resolutions.

**IX. Role of the Affirmative Action/EEO Officer**

- A. It is the primary responsibility of the Affirmative Action/EEO Officer to ensure the effective installation, maintenance, processing, recordkeeping, and notification required by the complaint procedure.

- B. The Affirmative Action/EEO Officer may designate other person(s) to assist in any part of the process and procedure.

**X. Interpretation**

- A. The authority to interpret this policy rests with the president and is generally delegated to the Affirmative Action/EEO Officer. Questions about this policy should be referred to the Affirmative Action/EEO Officer.

**XI. Referral Services**

- A. State of Wisconsin Department of Workforce Development
- B. Equal Employment Opportunity Commission
- C. Department of Education, Office of Civil Rights



## SECTION II Dissemination

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Electronic copies of the complete 2014 - 2019 AA/EEO Five–Year Plan will be distributed to the following management staff: President, Vice Presidents, Deans, Directors, Associate Deans, Student Services, Administrative Services, Financial Services, Information Technology Services, Student & Community Development, and Foundation upon board approval. The plan will also be published on the FVTC website.

The FVTC Board of Trustees and all staff will be informed of the completed 2014 - 2019 AA/EEO Five–Year Plan and of the availability on-line or from the Affirmative Action/Equal Opportunity Officer.

Electronic copies of the 2014 - 2019 AA/EEO Five–Year Plan and Annual Updates will be provided to the Wisconsin Technical College System AA/EEO Officer and other Technical College AA/EEO Officers, as requested.

Fox Valley Technical College affirms a set of core values, which includes Diversity. “We value an educational environment that attracts and supports a diverse student/staff community and fosters global awareness.” Core Values are incorporated into the day-to-day operations, including published on FVTC webpage, Strategic Plan, etc.

*Employee and Employment Applicant AA/EEO Dissemination Activities:*

FVTC Website Footer – “An Equal Opportunity College”	Ongoing – Located on all FVTC webpages, statement links to AA/EEO Notification of Compliance Webpage
Equal Rights Policy	New Employee Packet New Employee Orientation Management Training Ongoing – FVTC Intranet and Internet FVTC Harassment Reporting Procedure to Employees Document
AA/EEO Notification of Compliance	Ongoing – FVTC Internet Ongoing – Jobs @ FVTC Webpage Ongoing – Each, Individual Job Posting Ongoing – FVTC Recruitment Process FAQ Annual – Legal Ad in District Newspapers Annual – Email to all staff
FVTC Harassment Reporting Procedure for Employees	Every January and August – Email to all staff Management Training Ongoing – FVTC Intranet
Anti-Harassment & Discrimination Training for New Employees	New Employee Orientation Online Training
Anti-Harassment & Discrimination Training for Managers	Upon Hire or Transfer of Management Employee Periodically – All Management Staff
FVTC Employee Handbook	New Employee Packet New Employee Orientation
EEO Compliance Posters	Ongoing - All FVTC Locations

Request for Accommodations	Ongoing – Affirmative Action Survey Ongoing – Jobs @ FVTC Webpage Ongoing – Intranet
Affirmative Action Survey	Employment Application New Employee Packet
Diversity Statement	Ongoing – Jobs @ FVTC Webpage Ongoing – Each, Individual Job Posting Ongoing – FVTC Recruitment Process FAQ Ongoing – Job Descriptions Ongoing – Interview & Selection Materials

*Student AA/EEO Dissemination Activities:*

All college policies are posted and maintained on the public college website. The District's policies on Affirmative Action and Equal Employment Opportunity are located on a searchable webpage, and the policy is referenced in printed materials. The address and telephone number of the Equal Opportunity Officer are provided.

The Student Handbook, Catalog, and other student directed publications include instructions on accessing all policies and complaint procedures on the college website.

Affirmative Action/EEO, and Campus SaVE/Title IX Policies and complaint procedures are discussed at student orientation sessions. Training and awareness-building activities are provided for new students, and on an ongoing basis for all students.

## SECTION III

### Self-Evaluation – Federal and State Regulations

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#### I. Title VI, Civil Rights Act of 1964

1. Regulation 80.6 (a & b) - Requires recipients to file an assurance stating that no person shall, on the basis of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program receiving federal financial assistance.

*Question:* Does the district have on file with the Department of Education an assurance of compliance for Title VI?

Yes                       No

2. Regulation 80.6 (b & c) - Requires recipients to keep, and to submit to the federal agency or designee, such records or information necessary to ascertain whether the recipient has complied or is complying with Title VI.

*Question:* Does the district have available racial / ethnic data showing the extent to which members of minority groups are beneficiaries of and participants in all educational programs?

Yes                       No

3. Regulation 80.6 (d) - Requires recipients to make such information concerning the provisions of this regulation and its applicability available to participants, beneficiaries, and other interested persons in such manner as the department official finds necessary to apprise such persons of the protections against discrimination assured by the Act and the regulation. This includes Section 80.7(b), "Procedures for Filing Complaints of Discrimination Prohibited by this Part" (Title VI).

*Question:* Has the district adopted such procedures for filing complaints (grievances)?

Yes                       No

*Question:* Has the district made such information available to apprise persons of the protections assured by the Act and this regulation?

Yes                       No

4. Regulation 80.6(d) - Requires all recipients to make available to participants, beneficiaries, and other interested persons, information regarding the provision of Title VI and its application to recipients' programs.

*Question:* Does the district have a policy statement which affirms nondiscrimination on the basis of race, color, or national origin and the application of this policy?

Yes  No

*Question:* Has this policy notification been disseminated to participants, beneficiaries, and other interested persons?

Yes  No

*Question:* Is this policy statement currently posted in bulletins, catalogs, application forms, and other general information materials?

Yes  No

## II. Title IX - Self Evaluation

### Procedural Requirements

1. Regulation 86.3 (c & d) - Requires each recipient to evaluate its policies and practices and the effects thereof concerning student admission and treatment, and employment of academic and non-academic personnel connected with the educational program or activities.

*Question:* Did the district undertake such a self-evaluation?

Yes  No

*Question:* Does the district have the results of the Title IX self-evaluation on file?

Yes  No

*Question:* Can the district provide evidence of the modification of policies and practices that occurred or remedial steps taken as a result of the Title IX self-evaluation?

Yes  No

2. Regulation 86.3(d) - Requires recipients to keep self-evaluation and related materials on file for at least three years following completion including a description of any modification made and any remedial steps taken as a result of the self-evaluation.

3. Regulation 86.4 - Requires each recipient to file a statement that no persons shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any educational program or activity receiving federal assistance.

*Question:* Does such statement of assurance include a commitment to take whatever remedial action necessary to eliminate existing sex discrimination or the effects of past discrimination?

Yes  No

*Question:* Can the district document its remedial action efforts?

Yes  No

4. Regulation 86.8(a) - Requires all recipients to designate a specific employee (coordinator) to coordinate the recipient's compliance activities and investigate complaints alleging the recipient's noncompliance with Title IX.

*Question:* Has the district designated an employee(s) to coordinate compliance efforts and to investigate complaints of sex discrimination?

Yes  No

*Question:* Has this person's title, address, and telephone number been given to students, parents, and employees?

Yes  No

5. Regulation 86.8(b) - Requires all recipients to adopt and publish grievance procedures providing for prompt and equitable resolution of student and employee complaints alleging any action which would be prohibited by Title IX.

*Question:* Has the district adopted such grievance procedures?

Yes  No

*Question:* Can the district document the publication of grievance procedures providing for prompt and equitable resolution of student and employee complaints of sex discrimination?

Yes  No

6. Regulation 86.9 - Requires recipients to take specific and continuing steps to notify applicants for admission and employment, students, parents, employees, applicants for employment, sources of referral, and all union and professional organizations of the provisions and application of Title IX in offering educational programs.

*Question:* Has a policy statement of nondiscrimination on the basis of sex been adopted, published, and disseminated to students, parents, employees, applicants for employment, sources of referral, and all unions or professional organizations?

Yes  No

*Question:* Was and does such notification continue to be made in newspapers and publications operated by recipient or by student alumni groups for or in connection with recipient; memorandum or other written communication distributed to every student and employee?

Yes  No

*Question:* Is such notification currently posted in bulletins, catalogs, application forms, other recruitment materials for students and employees?

Yes  No

*Question:* Does such notification identify the Title IX coordinator by giving the title, address and telephone number?

Yes  No

### III. Section 504 - Self Evaluation

#### Procedural Requirements

1. Regulation 84.5 - Requires each recipient to submit an assurance stating that no otherwise qualified handicapped persons shall, by reason of disability, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity.

*Question:* Has the district provided an assurance stating its commitment to nondiscrimination on the basis of disability?

Yes  No

2. Regulation 84.6(c) - Requires the recipient to evaluate, with the assistance of interested persons including disabled persons or organizations representing them, its current policies and practices and the effects thereof.

*Question:* Did the district undertake such a self-evaluation?

Yes  No

*Question:* Does the district have the results of their Section 504 self-evaluation?

Yes  No

*Question:* Can the district provide evidence of the interested persons consulted, a description of areas examined, and problems identified; and any modification of policies and practices that occurred or remedial steps taken to eliminate the effects of past discrimination?

Yes  No

3. Regulation 84.6(c2) - Requires recipients that employ 15 or more persons to, for at least three years following completion of the self-evaluation, maintain on file the list of interested persons consulted, a description of areas and problems examined, and a description of any modifications made.

4. Regulation 84.7(a) - Requires a recipient that employs 15 or more persons to designate at least one person to coordinate its efforts to comply with Section 504.

*Question:* Has the district designated an employee to coordinate compliance efforts?

Yes  No

*Question:* Has this person's title, address, and telephone number been given to students, parents and employees?

Yes  No

5. Regulation 84.7(b) - Requires a recipient that employs 15 or more persons to adopt grievance procedures that incorporate appropriate due process standards and that provide for the resolution of complaints alleging unlawful discrimination against the disabled.

*Question:* Can the district document the adoption and existence of such grievance procedures?

Yes  No

*Question:* Has the district taken steps to inform its beneficiaries of such grievance procedures?

Yes  No

6. Regulation 84.8 - Requires each recipient that employs 15 or more persons to take initial and continuing steps to notify participants, beneficiaries, applicants, employees, unions, or professional organizations that it does not discriminate on the basis of disability in admission or access to, or treatment of or employment in its programs and activities.

*Question:* Has a policy statement of nondiscrimination on the basis of disability been adopted, published and disseminated as required?

Yes  No

*Question:* Does such notification identify the specific persons designated to coordinate compliance to Section 504?

Yes  No

*Question:* Is such notification currently posted in recruitment materials or publications containing general information?

Yes  No

7. Regulation 84.22(e) - Requires recipients that employ 15 or more persons to develop a transition plan setting forth the steps necessary to complete structural changes to facilities that are necessary for program accessibility.

*Question:* Did the district develop a transition plan?

- Yes                       No

*Question:* Was the plan developed with the assistance of interested persons or organizations representing disabled persons?

- Yes                       No

*Question:* Is the transition plan available for review?

- Yes                       No

*Question:* Has the district completed all the structural changes addressed in the transition plan?

- Yes                       No

*Question:* Can the district document the steps taken toward meeting the requirements of its transition plan for program accessibility?

- Yes                       No

#### **IV. Career and Technical Education Program Guidelines – Self-Evaluation**

##### Procedural Requirements

1. Guideline IV - Requires recipients to locate educational facilities at sites that are readily accessible to both non-minority and minority communities.

*Question:* Does the district provide educational facilities at locations that are accessible to all communities regardless of race, color, or national origin?

- Yes                       No

2. Guideline IV(L) - Requires recipients to: (a) identify its applicants with limited English-speaking skills and to assess their ability to participate; (b) use acceptable methods of identification; (c) take steps to open all programs to these students; and (d) if necessary, demonstrate that a concentration of such students in one or a few programs is not the result of discriminatory limitations of opportunities available to such students.

*Question:* Does the district use a system to identify its limited English language students and to assess their ability to participate?

- Yes                       No



*Question:* Does the district provide language-related support services to its limited English language students?

Yes  No

*Question:* Have steps been taken by the district to open all programs to limited English language students?

Yes  No

*Question:* Can the district demonstrate that a concentration of limited English language students in one or a few programs is not the result of unlawful discrimination?

Yes  No

3. Guideline IV(N) - Requires recipients to, if necessary, (1) modify instructional equipment, (2) modify or adapt the manner in which courses are offered, (3) house the program in facilities that are accessible or alter facilities to make them readily accessible to mobility impaired students, and (4) provide auxiliary or related aids and services.

*Question:* Are there architectural barriers which deny disabled students access to educational programs and courses?

Yes  No

*Question:* Is the district providing the necessary related aids or services to disabled students so they may have access to educational programs and courses?

Yes  No

4. Guideline IV(O) - Requires recipients to issue public notification that all educational opportunities will be offered without regard to race, color, national origin, sex or disability; and, if necessary, disseminate public notification materials in the language of persons of national origin.

*Question:* At the beginning of each year, does the district advise the students, parents, employees, and the general public of its nondiscrimination policy?

Yes  No

*Question:* Is this notification advertised in a manner that is accessible to all members of the general public regardless of race, color, national origin, sex or disability?

Yes  No

*Question:* Does the announcement provide information on course offerings, admissions criteria, and the titles, telephone numbers and addresses of the coordinators of Title IX and Section 504?

Yes  No

*Question:* Is the announcement communicated in the native language of national origin minorities for communities of national origin minorities in the service area?

Yes                       No

*Question:* Does the announcement include an assurance that the lack of English language skills will not be a barrier to admission and participation?

Yes                       No

5. Guideline V(A) - Requires recipients to ensure that counseling materials and activities (such as student program selection and career / employment selection), promotional, and recruitment efforts do not discriminate on the basis of race, color, national origin, sex, or disability.

*Question:* Does the district take steps to ensure that counseling materials and activities, and promotional and recruitment efforts do not discriminate on the basis of race, color, national origin, sex or disability?

Yes                       No

6. Guideline V(B) - Requires recipients operating career and technical educational programs to ensure that counselors do not direct or urge any student to enroll in a particular career or program area or measure or predict a student's prospects for success in any career or program based upon the student's race, color, national origin, sex, or disability; and if there is disproportionate enrollment of either sex, minority group, or disabled students in a program, recipients are required to take steps to ensure that such an occurrence does not result from unlawful discrimination in counseling.

*Question:* Do counselors direct or urge any students to enroll in a particular career or program on the basis of race, color, national origin, sex, or disability?

Yes                       No

*Question:* Do counselors measure or predict a student's prospects for success in any career or program based on the student's race, color, national origin, sex, or disability?

Yes                       No

*Question:* Do counselors counsel handicapped students toward more restrictive career objectives than non-disabled students with similar abilities and interests?

Yes                       No

*Question:* Does the district take steps to ensure that disproportionate enrollment of either sex, minority group, or disabled students in a program are not the result of unlawful discrimination?

Yes                       No

7. Guideline V(C) - Requires recipients to conduct student recruitment activities in a manner that does not exclude or limit opportunities on the basis of race, color, national origin, sex, or disability.

*Question:* Are students recruited and counseled to education programs without regard to race, color, national origin, sex, or disability?

Yes  No

*Question:* Are career opportunities and curricular programs presented in a manner that does not discriminate on the basis of race, color, national origin, sex, or disability?

Yes  No

*Question:* Do the materials used in recruiting or promotional efforts limit the portrayal of career opportunities or tend to perpetuate or create stereotypes or limitations based on race, national origin, sex, or disability through text or illustration?

Yes  No

*Question:* Are members of the protected groups represented and active in recruitment and counseling activities?

Yes  No

*Question:* Are provisions made for the limited English language minorities and disabled persons to receive promotional literature and comparable recruitment efforts in a medium in which they can communicate?

Yes  No

8. Guideline V(D) - Requires recipients to ensure that counselors can effectively communicate with national origin minority students with limited English language skills and with students who have hearing or visual impairments.

*Question:* Has the district taken steps to ensure that counselors can effectively communicate with national origin minority students with limited language skills and with students who have hearing or visual impairments.

Yes  No

9. Guideline V(E) - Requires recipients to, if necessary, distribute promotional literature to national origin minority persons in their native language.

*Question:* Does the district provide promotional literature to national origin minorities in their native language for identified communities of national origin minority persons with limited English language skills?

Yes  No

10. Guideline VI(B) - Requires recipients to, if necessary, provide materials and information used as notification of opportunities for financial assistance to be

distributed and communicated in a manner that it can be accessed by national origin minority persons with limited English language skills.

*Question:* Does the district provide materials and information used as notification of opportunities for financial assistance distributed and communicated in a manner that is accessible to national origin minority students with limited English language skills?

Yes                       No

11. Guideline VI(C) - Requires recipients that provide housing in residential post-secondary education centers to extend housing opportunities, whether on campus or off campus, without discrimination, and provide comparable, convenient, and accessible housing at the same cost and under the same conditions for disabled students.

*Question:* If provided by a district that has career and technical education programs, is on campus and off campus housing provided for all regardless of race, sex, or disability?

Yes                       No

*Question:* Is the housing provided for disabled students comparable, convenient and offered at the same cost and conditions as for other students?

Yes                       No

12. Guideline VI(D) - Requires recipients that provide facilities for one sex to provide comparable facilities to those of the other sex and be readily accessible to disabled persons.

*Question:* Does the district provide common facilities which have been modified or are separate comparable facilities (changing rooms, showers, etc.) offered for students of both sexes?

Yes                       No

*Question:* Have facilities been adapted or modified to the extent necessary to make the educational program readily accessible to the disabled?

Yes                       No

13. Guideline VII(A) - Requires recipients to ensure that they do not discriminate against students on the basis of race, color, national origin, sex, or disability in making cooperative educational programs, job placement and apprentice training opportunities available to students; and that students participating in these types of programs are not discriminated against by employers or prospective employers in recruitment, hiring, placement, assignment to work tasks, hours of employment, levels of responsibility, and in pay; contracts or written agreements when used in relation to these opportunities must contain a statement of assurance indicating that students will be accepted and assigned to jobs and otherwise treated without regard to race, color, national origin, sex, or disability.

*Question:* Does the district make opportunities in its work study, cooperative education and job placement programs available to students without regard to race, color, national origin, sex, or disability?

Yes  No

*Question:* Does the district ensure that students placed in cooperative education work study, or job placement programs receive equal treatment with regard to task assignment, numbers of hours worked, responsibility levels, and pay?

Yes  No

*Question:* Are assurances of non-discrimination contained in written agreements for the referral or assignment of students to an employer?

Yes  No

14. Guideline VII(B) - If written agreements with a labor unions or other sponsors providing apprentice training are used, recipients are required to include an assurance that the union or other sponsor does not engage in discrimination against its membership or applicants for membership; and that apprentice training will be offered and conducted free of discrimination on the basis of race, color, national origin, sex or disability.

*Question:* Does the district enter into any agreements for the provision or support of apprentice training with any labor union or other sponsor?

Yes  No

*Question:* Do written agreements contain an assurance that they do not discriminate against their members or applicants?

Yes  No

15. Guideline VIII(B) - Requires the recipient to notify every source of faculty that it does not discriminate on the basis of race, color, national origin, sex, or disability.

*Question:* Has the district attempted to notify every source of faculty that it does not discriminate on the basis of race, color, national origin, sex, or disability?

Yes  No

16. Guideline VIII(D) - Requires the recipient to establish and maintain faculty salary scales on the basis of the conditions and responsibilities of employment without regard to race, color, national origin, sex, or disability.

*Question:* Are faculty salary scales and policy based upon the conditions and responsibilities of employment without regard to race, color, national origin, sex, or disability?

Yes  No

17. Guideline VIII(E) - Requires recipients to provide equal employment opportunities for teaching and administrative positions to handicapped applicants who can perform the essential functions for the position; and make reasonable accommodations for the physical or mental limitations of disabled (otherwise qualified) applicants unless it can be demonstrated that such accommodations would impose undue hardship.

*Question:* Does the district provide reasonable accommodations to the known physical or mental limitations of an otherwise qualified disabled applicants or employees?

Yes                       No

18. Guideline VIII(F) - Requires recipients to take steps to overcome the effects for past discrimination. Such steps may include the recruitment or reassignment of qualified persons of a particular race, national origin, or sex, or who are disabled.

*Question:* Does the district limit its recruitment efforts to schools, communities or companies which are disproportionately composed of persons of a particular race, national origin, sex, or disability?

Yes                       No

#### **V. Americans with Disabilities Act - Self Evaluation**

1. Title 28, Part 35, Subpart A & C - Prohibits the denial of services or benefits on the basis of a disability.

*Question:* Has the district included disability in its non-discrimination policies?

Yes                       No

2. Title 28, Part 35, Subpart B - Provides for equality of opportunity to participate in or benefit from a public entity's aids, benefits, and services. In addition, provides for equal participation in the "mainstream" of society.

*Question:* Are persons with disabilities afforded an equally effective opportunity to participate in or benefit from an aid, benefit or service?

Yes                       No

*Question:* Are individuals with disabilities integrated to the maximum extent appropriate?

Yes                       No

*Question:* If separate programs are offered, are they appropriate to the particular individual?

Yes                       No

*Question:* Have any individuals with disabilities been excluded from a regular program or required to accept special services or benefits?

Yes  No

*Question:* Are individuals with disabilities provided accommodations necessary to allow them to participate in regular programs?

Yes  No

3. Title 28, Part 35, Subpart D - A public entity may not impose eligibility criteria for participation in its programs, services or activities that either screen out or tend to screen out persons with disabilities, unless it can show that such requirements are necessary for the provision of the service, program or activity.

*Question:* Are any safety requirements imposed based on real risks, not speculation, stereotypes or generalizations about individuals with disabilities?

Yes  No

*Question:* Are any inquiries made into a disability absolutely necessary to insure safe participation?

Yes  No

*Question:* In cases where extra costs are incurred does the district absorb the cost without charge to the disabled individual being served?

Yes  No

*Question:* Are modifications to policies, practices or procedures in programs made to accommodate disabled individuals except where the modification would fundamentally alter the nature of the service, program or activity?

Yes  No

4. Title 28, Part 35, Subpart D - A public entity may not deny the benefits of its programs, activities, and services to individuals because its facilities are inaccessible. The "program accessibility standard" requires that a public entity's services, programs, and activities, when viewed in their entirety, be readily accessible to and usable by individuals with disabilities.

*Question:* Has the district conducted a review of its facilities, developed a transition plan, and made changes as needed to achieve program accessibility?

Yes  No

*Question:* Where access involves back door or freight elevators, is such an arrangement used only as a last resort in cases where it provides accessibility comparable to that provided to persons without disabilities who generally use front doors and passenger elevators?

Yes  No

*Question:* Are adequate numbers of accessible parking spaces in existing parking lots or garages available?

Yes  No

5. Title 28, Part 35, Subpart E - Provides that a public entity must ensure that its communication with individuals with disabilities are as effective as communications with others. In order to provide equal access, a public accommodation is required to make available appropriate auxiliary aids and services where necessary to ensure effective communication.

*Question:* Is a procedure available that provides an opportunity for individuals with disabilities to request auxiliary aids and services of their choice?

Yes  No

*Question:* Does the procedure provide for primary consideration to and consultation with the individual in regard to their primary choice?

Yes  No

*Question:* Where interpreters are supplied, are they qualified, i.e., "able to sign to the individual who is deaf what is being said by the hearing person and who can voice to the hearing person what is being signed by the individual who is deaf ... effectively, accurately, and impartially including the use of necessary specialized vocabulary"?

Yes  No

*Question:* Where telephone communications are available, are equally effective communication devices or services provided for individuals with disabilities, including hearing and speech impaired individuals?

Yes  No

6. Title 28, Part 35, Subpart F - Provides for administrative requirements including preparation of a self-evaluation, development of a transition plan, providing notice to the public, designation of a responsible employee and development of a grievance procedure.

*Question:* Has the district developed a self-evaluation plan that identifies all of their programs, activities and services; and reviews all policies and practices that govern the programs, activities and services.



Yes  No

*Question:* Has the district developed a transition plan for structural modifications required to achieve program accessibility and provided a copy of that plan to the WTCS Facilities Director as part of the district's five-year facility plan?

Yes  No

*Question:* Has the district provided information on ADA's requirements to applicants, participants, beneficiaries, and other interested persons which explains ADA's prohibitions against discrimination?

Yes  No

*Question:* Has the district adopted and published a grievance procedure providing for prompt and equitable resolution of complaints alleging any action prohibited by ADA?

Yes  No

*Question:* Has the district designated at least one employee to coordinate its efforts to comply with and fulfill its responsibilities of the ADA, including the investigation of complaints?

Yes  No

## VI. Wisconsin Fair Employment Act

1. Section 111.31, Wis. Stats. - Provides that the practice of unfair discrimination in employment against properly qualified individuals by reason of their age, race, creed, color, disability, marital status, sex, national origin, ancestry, sexual orientation, arrest record, conviction record, military service, or the use or non-use of lawful products off the employer's premises during non-working hours is illegal.

*Question:* Does the district as an employer base an evaluation of an employee or applicant for employment upon the employee's or applicant's individual qualifications rather than upon a particular class to which the individual may belong?

Yes  No

*Question:* Does the district avoid making, using or circulating any statement, advertisement or publication, or avoid using any form of application for employment or avoid making any inquiry in connection with prospective employment which is prohibited by the Wisconsin Fair Employment Act?

Yes  No

*Question:* Does the district as an employer refrain from prohibited honesty, genetic, and other testing prohibited by the Wisconsin Fair Employment Act?

Yes  No

**VII. Chapter 38, Wis. Stats.**

1. Chapter 38, Wis. Stats. - Includes the requirement at ss. 38.12(11), Wis. Stats. to conduct an orientation program and provide information on sexual harassment, and the general prohibition against discrimination in admission and/or participation in services, programs, courses and facilities usage based upon race, color, creed, religion, sex, national origin, disability, ancestry, age, sexual orientation, pregnancy, marital status or parental status.

*Question:* Does the district incorporate in its orientation program for newly entering students, oral and written information on sexual assault and sexual harassment?

- Yes                       No

*Question:* Does the district annually supply all students enrolled in the district printed material on sexual harassment and sexual assault?

- Yes                       No

*Question:* Does the district annually submit a report to the chief clerk of each house of the Wisconsin legislature indicating the methods used to comply with orientation and information requirements?

- Yes                       No

*Question:* Does the district have established policies to protect students from discrimination which provides criteria for determining discrimination as prohibited, provides remedies and sanctions for violations, establishes a 300-day time limit on filing and establishes a procedure with reasonable time limits to act on complaints?

- Yes                       No

**VIII. Contract for Services - TCS 8**

Policy and Procedural Requirements Relating to Non Discrimination

1. TCS 8.04(7)(a)(b) - Requires each district board to adopt policies and procedures governing contracts for services with service recipients.

*Question:* Does the district have a policy and procedure governing contracts for service with recipients?

- Yes                       No

*Question:* Does the district's contract for service policy include a statement of non-discrimination on the basis of age, race, color, sex, creed, disability, political persuasion, ancestry, or sexual orientation against students and employees or student and employee applicants?

- Yes                       No

2. TCS 8.05(4)(a)(b) - Requires that the service recipient certify that it does not discriminate on the basis of age, race, color, sex, creed, disability, political persuasion, ancestry, or sexual orientation against any employee, applicant for employment, any student, or applicant for enrollment.

*Question:* Does the district certify that service recipients do not discriminate on the basis of age, race, color, sex, creed, disability, political persuasion, ancestry, or sexual orientation against students and employees or student and employee applicants?

Yes                       No

## SECTION IV

### Self-Analysis of Work Force and Goals Establishment

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#### **General Workforce Goals:**

Total district employment of minorities is at 3.87% (29 of 750 college staff). The district wide availability percentage for Administrative, Faculty, Secretarial/Clerical, Professional Non Faculty, Technical/Para-Professional, Skilled Craft, and Service Maintenance, is at 7.08% (17,584 of 248,365). As a result, the college, overall, is underutilized for minority employment. Therefore, the college has a broad general workforce goal to hire minority employees to work toward achieving a percentage of 7.08% (53 of 750) matching the workforce minority availability percentages of the district figures.

The college employs disabled staff. *However, the specific number of disabled employed is not accurately reflective in the college's records at this time.* District employment of disabled employees is reported at 0.80% (6 of 750 college staff). The district wide availability percentage for Administrative, Faculty, Secretarial/Clerical, Professional Non Faculty, Technical/Para-Professional, Skilled Craft, and Service Maintenance, is at 5.33% (13,227 of 248,365). Therefore, the college has a goal to employ disabled employees and work toward achieving a percentage of 5.33% (39 of 750) matching the workforce disabled availability percentage. The college also has a goal to correct the tracking of employees with disabilities.

Females are employed at a rate of 55.07% (413 of 750). Availability is at 47.73% (118,535 of 248,365). The college is not underutilized for females when looking at the total district workforce; therefore, the college has no goal in this area.

#### **Specific Workforce Category Goals:**

**Administration:** FVTC employs 5 minorities with total employment of 99 (5.05%) in this category. The availability percentage of minorities in the district workforce in this category is 4.87%. Therefore, the college has no goal in this area.

**Faculty:** FVTC employs 11 minorities with total employment of 346 (3.18%) in this category. The availability percentage of minorities in the district workforce in this category is 8.05%. Therefore, the college has a goal to hire minority faculty to achieve a category minority percentage of 8.05% (27 of 346).

**Professional Non-Faculty:** FVTC employs 2 minorities with total employment of 46 (4.35%) in this category. The availability percentage of minorities in the district workforce in this category is 3.17%. Therefore, the college has no goal in this area.

**Clerical/Secretarial:** FVTC employs 4 minorities with total employment of 110 (3.64%) in this category. The availability percentage of minorities in the district workforce in this category is 6.09%. Therefore, the college has a goal to hire clerical/secretarial staff to achieve a category minority percentage of 6.09% (7 of 110).

**Technical/ Para-Professional:** FVTC employs 7 minorities with total employment of 119 (5.88%) in this category. The availability percentage of minorities in the district workforce in this category is 5.50%. Therefore, the college has no goal in this area.

**Skilled Crafts:** FVTC employs 10 employees in this category. There are no minority employees. The current minority employment in this category is 16.05%. Therefore, the college has a goal to hire minority skilled crafts staff to achieve a minority percentage of 16.05% (1 of 10).

**Service Maintenance:** FVTC employs 20 employees in this category. There are no minority employees. The current minority employment in this category is 8.62%. Therefore, the college has a goal to hire minority service maintenance staff to achieve a category minority percentage of 8.62% (1 of 20).

DISTRICT NAME: FOX VALLEY TECHNICAL COLLEGE  
 ORGANIZATIONAL LEVEL: DISTRICT

**DISTRICT WORKFORCE ANALYSIS**

CATEGORY	TOTAL	FEMALES		PERSONS WITH DISABILITIES		RACIAL/ETHNIC GROUPS			
						American Indian/ Alaska Native		Asian	
		No.	%	No.	%	No.	%	No.	%
<b>Administrative<sup>1</sup></b>									
WTCS District Employees	99	67	67.68%	0	0.00%	3	3.03%	0	0.00%
District Labor Force	20,987	9,564	45.57%	797	3.80%	154	0.73%	363	1.73%
% Difference (+ or -)			22.11%		-3.80%		2.30%		-1.73%
Underutilizations (yes/no)			No		Yes		No		Yes
<b>Faculty<sup>2</sup></b>									
WTCS District Employees	346	142	41.04%	4	1.16%	1	0.29%	4	1.16%
District Labor Force	1,403	774	55.17%	70	4.99%	0	0.00%	88	6.27%
% Difference (+ or -)			-14.13%		-3.83%		0.29%		-5.12%
Underutilizations (yes/no)			Yes		Yes		No		Yes
<b>Professional Non-Faculty</b>									
WTCS District Employees	46	32	69.57%	0	0.00%	1	2.17%	0	0.00%
District Labor Force	11,328	8,413	74.27%	343	3.03%	68	0.60%	84	0.74%
% Difference (+ or -)			-4.70%		-3.03%		1.57%		-0.74%
Underutilizations (yes/no)			Yes		Yes		No		Yes
<b>Clerical/Secretarial</b>									
WTCS District Employees	110	99	90.00%	2	1.82%	0	0.00%	2	1.82%
District Labor Force	15,639	14,510	92.78%	791	5.06%	321	2.05%	125	0.80%
% Difference (+ or -)			-2.78%		-3.24%		-2.05%		1.02%
Underutilizations (yes/no)			Yes		Yes		Yes		No

<sup>1</sup> Includes supervisors of professional and non-professional employees and Deans, Directors, Associate Deans, Assistant Deans, and Executive Officers of academic departments if their principal activity is administrative.

<sup>2</sup> Includes Deans, Directors, Associate Deans and Executive Officer of academic departments if their principal activity is instructional.

DISTRICT NAME: FOX VALLEY TECHNICAL COLLEGE  
 ORGANIZATIONAL LEVEL: DISTRICT

**DISTRICT WORKFORCE ANALYSIS**

CATEGORY	TOTAL	FEMALES		PERSONS WITH DISABILITIES		RACIAL/ETHNIC GROUPS			
						American Indian/ Alaska Native		Asian	
		No.	%	No.	%	No.	%	No.	%
<b>Technical/Para-Professional</b>									
WTCS District Employees	119	63	52.94%	0	0.00%	0	0.00%	4	3.36%
District Labor Force	5,256	3,111	59.19%	200	3.81%	40	0.76%	160	3.04%
% Difference (+ or -)			-6.25%		-3.81%		-0.76%		0.32%
Underutilizations (yes/no)			Yes		Yes		Yes		No
<b>Skilled Crafts</b>									
WTCS District Employees	10	0	0.00%	0	0.00%	0	0.00%	0	0.00%
District Labor Force	4,972	2,099	42.22%	423	8.51%	41	0.82%	145	2.92%
% Difference (+ or -)			-42.22%		-8.51%		-0.82%		-2.92%
Underutilizations (yes/no)			Yes		Yes		Yes		Yes
<b>Service/Maintenance</b>									
WTCS District Employees	20	10	50.00%	0	0.00%	0	0.00%	0	0.00%
District Labor Force	23,285	12,541	53.86%	1,551	6.66%	300	1.29%	322	1.38%
% Difference (+ or -)			-3.86%		-6.66%		-1.29%		-1.38%
Underutilizations (yes/no)			Yes		Yes		Yes		Yes
<b>District Totals</b>									
WTCS District Employees	750	413	55.07%	6	0.80%	5	0.67%	10	1.33%
District Labor Force	248,365	118,535	47.73%	13,227	5.33%	2,473	1.00%	4,869	1.96%
% Difference (+ or -)			7.34%		-4.53%		-0.33%		-0.63%
Underutilizations (yes/no)			No		Yes		Yes		Yes

DISTRICT NAME: FOX VALLEY TECHNICAL COLLEGE  
 ORGANIZATIONAL LEVEL: DISTRICT

**DISTRICT WORKFORCE ANALYSIS**

CATEGORY	RACIAL/ETHNIC GROUPS											
	Black/ African American		Hispanic/ Latino		Native Hawaii or Pacific Islander		Multi-Racial		White		Unknown	
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%
<b>Administrative<sup>1</sup></b>												
WTCS District Employees	2	2.02%	0	0.00%	0	0.00%	0	0.00%	94	94.94%	0	0.00%
District Labor Force	16	0.08%	331	1.58%	0	0.00%	143	0.68%	19,964	95.12%	0	0.00%
% Difference (+ or -)		1.94%		-1.58%		0.00%		-0.68%		-0.18%		0.00%
Underutilizations (yes/no)		No		Yes		No		Yes		N/A		N/A
<b>Faculty<sup>2</sup></b>												
WTCS District Employees	2	0.58%	4	1.16%	0	0.00%	0	0.00%	335	96.82%	8	2.31%
District Labor Force	0	0.00%	15	1.07%	0	0.00%	10	0.71%	1290	91.94%	N/A	N/A
% Difference (+ or -)		0.58%		0.09%		0.00%		-0.71%		4.88%		N/A
Underutilizations (yes/no)		No		No		No		Yes		N/A		N/A
<b>Professional Non-Faculty</b>												
WTCS District Employees	0	0.00%	1	2.17%	0	0.00%	0	0.00%	44	95.65%	0	0.00%
District Labor Force	21	0.19%	137	1.21%	0	0.00%	45	0.40%	10,969	96.83%	0	0.00%
% Difference (+ or -)		-0.19%		0.96%		0.00%		-0.40%		-1.18%		0.00%
Underutilizations (yes/no)		Yes		No		No		Yes		N/A		N/A
<b>Clerical/Secretarial</b>												
WTCS District Employees	1	0.91%	1	0.91%	0	0.00%	0	0.00%	106	96.36%	1	0.91%
District Labor Force	49	0.31%	355	2.27%	1	0.01%	104	0.67%	14,687	93.91%	N/A	N/A
% Difference (+ or -)		0.60%		-1.36%		-0.01%		-0.67%		2.45%		N/A
Underutilizations (yes/no)		No		Yes		No		Yes		N/A		N/A

<sup>1</sup> Includes supervisors of professional and non-professional employees and Deans, Directors, Associate Deans, Assistant Deans, and Executive Officers of academic departments if their principal activity is administrative.

<sup>2</sup> Includes Deans, Directors, Associate Deans and Executive Officer of academic departments if their principal activity is instructional.



DISTRICT NAME: FOX VALLEY TECHNICAL COLLEGE  
 ORGANIZATIONAL LEVEL: DISTRICT

**DISTRICT WORKFORCE ANALYSIS**

CATEGORY	RACIAL/ETHNIC GROUPS											
	Black/ African American		Hispanic/ Latino		Native Hawaii or Pacific Islander		Multi-Racial		White		Unknown	
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%
<b>Technical/Para-Professional</b>												
WTCS District Employees	0	0.00%	3	2.52%	0	0.00%	0	0.00%	112	94.11%	0	0.00%
District Labor Force	15	0.29%	62	1.18%	0	0.00%	11	0.21%	4,967	94.50%	0	0.00%
% Difference (+ or -)		-0.29%		1.34%		0.00%		-0.21%		-0.39%		0.00%
Underutilizations (yes/no)		Yes		No		No		Yes		N/A		N/A
<b>Skilled Crafts</b>												
WTCS District Employees	0	0.00%	0	0.00%	0	0.00%	0	0.00%	10	100.00%	0	0.00%
District Labor Force	74	1.49%	466	9.37%	0	0.00%	77	1.55	4,174	83.95%	0	0.00%
% Difference (+ or -)		-1.49%		-9.37%		0.00%		-1.55%		16.05%		0.00%
Underutilizations (yes/no)		Yes		Yes		No		Yes		N/A		N/A
<b>Service/Maintenance</b>												
WTCS District Employees	0	0.00%	0	0.00%	0	0.00%	0	0.00%	20	100.00%	0	0.00%
District Labor Force	427	1.83%	734	3.15%	21	0.09%	203	0.87%	21,277	91.37%	0	0.00%
% Difference (+ or -)		-1.83%		-3.15%		-0.09%		-0.87%		8.63%		0.00%
Underutilizations (yes/no)		Yes		Yes		Yes		Yes		N/A		N/A
<b>District Totals</b>												
WTCS District Employees	5	0.67%	9	1.20%	0	0.00%	0	0.00%	721	96.13%	9	1.20%
District Labor Force	1,787	0.72%	6,651	2.68%	30	0.01%	1,769	0.71%	230,781	92.92%	N/A	N/A
% Difference (+ or -)		-0.05%		-1.48%		-0.01%		-0.71%		3.21%	N/A	N/A

## SECTION V

### Employment Program Affirmative Action Initiatives

#### **General Program 1: Expand outreach and increase overall diversity employment**

**Program Initiative A:** Expand community outreach to advocacy organizations.

<b>Activity / Steps</b>	<b>Persons Responsible for Implementation</b>	<b>Timetable</b>
Update the current, comprehensive database of various community based advocacy organizations within the district, i.e. disabled, minorities, gender, military/veterans, etc. Establish and implement a process to maintain database.	Human Resources Staff; Multicultural Manager and Staff; AA/EEO Officer	2014-15
Connect with community based advocacy organizations and contacts and build stronger, collaborative relationships.	Human Resources Staff; Multicultural Manager and Staff; AA/EEO Officer	2015-16
Design outreach materials and prepare presentations on FVTC employment.	Human Resources Staff; Staff Development; Multicultural Manager; AA/EEO Officer	2016-17
Conduct presentations with community based advocacy organizations on FVTC employment and seek assistance in recruitment at FVTC.	Human Resources Staff; Multicultural Manager; AA/EEO Officer	2017-19

**Program Initiative B:** Implement new recruitment strategies to increase diversity in employment.

<b>Activity / Steps</b>	<b>Persons responsible for Implementation</b>	<b>Timetable</b>
Work with college staff and community experts to research and explore new recruitment strategies for diversity in employment, i.e. disabled, minorities, gender, military/veterans, etc.	Human Resources Staff; AA/EEO Officer; Hiring Managers; Multicultural Manager	2015-16
Determine and identify recruitment strategies to increase diversity in employment, i.e. presentations, mock interviews, resume review, temporary working situations, site visits, etc.	Human Resources Staff; Multicultural Manager; AA/EEO Officer	2016-17
Implement at least two new diversity recruitment strategies.	Human Resources Staff; AA/EEO Officer; Multicultural Manager; Hiring Managers	2017-19

**Program Initiative C:** Enhance current process to identify and document new hire and current staff who are disabled, on an ongoing basis.

<b>Activity / Steps</b>	<b>Persons Responsible for Implementation</b>	<b>Timetable</b>
Review employment records and documents detailing accommodations granted to current employees for purposes of documenting disabled employees and applicants.	Director – Compensation & Benefits; Human Resources Staff	2015-16
Conduct voluntary survey of current employees for record keeping purposes only to document employees who are disabled.	Director – Compensation & Benefits; Human Resources Staff	2015-16
Establish and implement a process to conduct voluntary survey of current staff on an ongoing basis, every two years.	Director – Compensation & Benefits; Human Resources Staff	2016-19

**Program Initiative D:** Enhance current process to identify and document new hires and current staff who are military/veterans, on an ongoing basis.

<b>Activity / Steps</b>	<b>Persons Responsible for Implementation</b>	<b>Timetable</b>
Review employment records and documents for purposes of documenting military/veteran employees and applicants.	Human Resources Staff	2014-15
Review record keeping systems to enable the documentation and reporting of military/veteran staff under the state staff accounting system.	Human Resources Staff; State Reporting and Institutional Data Staff	2014-15
Conduct voluntary survey of current employees for record keeping purposes only to document employees who are military/veterans.	Human Resources Staff	2015-16
Establish and implement a process to conduct voluntary survey of current staff on an ongoing basis, every two years.	Human Resources Staff	2016-19

**General Program 1: Methods of Evaluation:**

The number of minorities, both generally in the FVTC workforce and in specific categories of employment, will be evaluated annually by the AA/EEO Officer and Human Resources Manager. Increased minority staff will be a general indicator of success. The effectiveness of each initiative will be reviewed annually by the AA/EEO Officer, Director- Staff Development, Human Resources Manager, and Deans.

**Annual Progress: (Give a (cumulative) report by each year of the 5 year plan.)**

**2014-2015:**

**2015-2016:**

**2016-2017:**

**2017-2018:**

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**General Program 2: Increase minority faculty**

**Program Initiative A:** Investigate recruitment and hiring areas for faculty and adjunct faculty.

<b>Activity / Steps</b>	<b>Persons responsible for Implementation</b>	<b>Timetable</b>
Re-evaluate current recruitment efforts for faculty positions; Investigate possible expansion or revisions; investigate possible or expanded cooperative efforts with area post-secondary schools such as technical colleges, universities or two year university campuses. Enhance comprehensive staff recruitment plan to increase candidates from diverse populations.	Human Resources Staff; AA/EEO Officer; Multicultural Manager; Hiring Managers	2015-17
Establish an 'eligible for interview' report of qualified candidates to be shared with networking participants.	Human Resources Staff; Certification Officer	2015-16
Design new approaches to implement recruitment campaigns targeted at minority faculty, i.e. Faculty and Adjunct Faculty Job Fair	Human Resources Staff; AA/EEO Officer; Multicultural Manager; Hiring Managers	2016-19

**Program Initiative B:** Develop and implement a faculty candidate mentoring program to assist candidates during interview and post interview situations in order to increase their candidacy for regular faculty vacancies (as program needs warrant).

Activity / Steps	Persons Responsible for Implementation	Timetable
Identify current minority adjunct faculty and minority faculty applicants who may be interested in regular employment (as program needs warrant).	AA/EEO Officer; Human Resources Staff; Multicultural Manager; Deans/Associate Deans; Certification Officer	2015-16
Develop services to offer as part of mentoring program, i.e. resume review, mock interviews, etc. Develop strategies to strengthen qualifications of minority adjunct faculty and minority faculty candidates.	Certification Officer; Staff Development; Human Resources Staff; Deans; AA/EEO Officer; Multicultural Manager	2016-17
Design and implement a mentoring program to assist minority adjunct faculty and minority faculty applicants for recruitment or interview situations to increase their candidacy for regular faculty vacancies (as program needs warrant).	AA/EEO Officer; Human Resources Staff; Multicultural Manager; Staff Development	2017-19

**Program Initiative C:** Develop and implement FVTC Faculty Minority Internship Program.

Activity / Steps	Persons Responsible for Implementation	Timetable
Research best practice minority internship programs.	Human Resources Staff, Multicultural Manager; AA/EEO Officer	2015-16
Develop minority based internship parameters and design a minority internship program.	Human Resources Staff, Multicultural Manager; AA/EEO Officer	2016-17
Implement minority internship program.	Human Resources Staff, Multicultural Manager; AA/EEO Officer	2017-18

**General Program 2: Methods of Evaluation:**

The number of minority faculty will be evaluated annually by the AA/EEO Officer and Human Resources Manager. Increased minority faculty will be a general indicator of success. The effectiveness of each initiative will be reviewed during the post review of the recruitment conducted by the AA.EEO Officer, Director- Staff Development, Human Resources Staff, and Deans.

**Annual Progress: (Give a (cumulative) report by each year of the 5 year plan.)**

**2014-2015:**

**2015-2016:**

**2016-2017:**

**2017-2018:**

**2018-2019: Final Summary Report**

### **General Program 3: Promote a positive, diverse climate through programs and services**

**Program Initiative A:** Establish a cross-functional, Diversity Inclusion Committee.

<b>Activity / Steps</b>	<b>Persons Responsible for Implementation</b>	<b>Timetable</b>
Establish cross-functional, Diversity Inclusion Committee to look at needs for all staff to honor and respect diversity in employment.	Human Resources Manager; Multicultural Manager; AA/EEO Officer	2015-16
Monitor the effectiveness of the committee, and adjust or improve as necessary.	Human Resources Manager; Multicultural Manager; AA/EEO Officer	2016-19 (Ongoing)

**Program Initiative B:** Provide new diversity inclusion training opportunities, activities, and/or programs for staff to recognize and value diversity, and create awareness and sensitivity.

<b>Activity / Steps</b>	<b>Persons responsible for Implementation</b>	<b>Timetable</b>
Research and select workforce-relevant diversity training opportunities, activities, and/or programs, i.e. multi-generational, multi-cultural, gender, disability, etc.	Human Resources Staff; Staff Development, AA/EEO Officer, Managers; Diversity Inclusion Committee	2015-16
Develop new curriculum and resources as applicable.	Human Resources Staff; Staff Development, AA/EEO Officer, Diversity Inclusion Committee	2016-17
Pilot and “fine tune” the parameters of the training opportunities, programs, and/or activities.	Staff Development; Human Resources Staff; Diversity Inclusion Committee	2017-18
Implement at least two new diversity inclusion training opportunities, activities, and/or programs and provide college staff with identified programs and resources to promote diversity inclusion.	Human Resources Staff; Staff Development; AA/EEO Officer Diversity Inclusion Committee	2018-19

**Program Initiative C:** Enhance current recruitment and staff onboarding to recognize and value diversity, and create awareness and sensitivity.

<b>Activity / Steps</b>	<b>Persons Responsible for Implementation</b>	<b>Timetable</b>
Develop approach and implement/enhance training for screening and interview committees in the need to recognize and value diversity in applicants.	Human Resources Staff; Staff Development; AA/EEO Officer	2015-17
Research and implement enhancement to onboarding for new staff to recognize and value diversity, and create awareness and sensitivity.	Human Resources Staff; Staff Development; AA/EEO Officer; Diversity Inclusion Committee	2017-19

#### **General Program 3: Methods of Evaluation:**

The conduct of programs, activities and training opportunities will be evaluated through participant evaluations and by the Director- Staff Development. In addition, the Director- Staff Development and the Equal Opportunity Officer will report to the Vice President- Human Resources on the effectiveness of efforts on the diversity climate and the status of the practice of cultural competency after contacts with the committee and employees.

**Annual Progress: (Give a (cumulative) report by each year of the 5 year plan.)**

**2014-2015:**

**2015-2016:**

**2016-2017:**

**2017-2018:**

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## SECTION VI

### Student Program Affirmative Action Initiatives

#### *Enrollment*

***Program 1: Increase the percentage of English Language Learning – Adult Basic Education students who transition into programs upon completing ELL programming and high school equivalency.***

The college serves a significant number of adults whose native languages are not English. Non-native English speakers who do not have high school credentials take non-credit classes to improve English writing, speaking, and career skills, as well as prepare for the GED/HSED. While the college has put emphasis on converting Adult Basic Education students into programs, a subset of the overall ABE population, the ELL students, require a different type of recruitment and support. As a result of this initiative, annual goals will be established to improve transition rates of ELL students into programs, as well as a better understanding of retention support needs.

Activity / Steps	Persons Responsible for Implementation	Timetable
Create a baseline of historical data related to ELL students who transition into programs. Identify the percentages of ELL students by ethnicity who currently transition, as well as target percentages to establish five year goals. Goals will reflect reasonable percentages of improvement over baseline transition data.	Multicultural Student Services, ELL instructors, Transition Specialists, Retention Specialist	2014-2015
Based on baseline data and established goals, develop action plans for recruitment. Provide targeted recruitment efforts to ELL students to meet established goals.	Multicultural Student Services, ELL instructors, Transition Specialists, Retention Specialist	2015-2016
Provide targeted recruitment efforts to ELL students to meet established percentage goal.	Multicultural Student Services, ELL instructors, Transition Specialists, Retention Specialist	2016-2017
Continue recruitment efforts based on established targets.	Multicultural Student Services, ELL instructors, Transition Specialists, Retention Specialist	2017-2018
Continue recruitment efforts based on target percentages of ELL students to ensure that targets are met. Upon completion of 2021, create summary report of improvements to recruitment.	Multicultural Student Services, ELL instructors, Transition Specialists, Retention Specialist	2018-2029

**Method of Evaluation:**

Data will be examined in Year 1 to identify the target population, subset of the Adult Basic Education students who are also English Language Learners. Target percentages will be established for Years 2-5 to improve the percentages of ELL students who transition into programs. Data and target percentages will be evaluated each year to ensure data integrity, as well as appropriate target percentages. Increases in percentages of ELL students who transition to programs will indicate success. Key stakeholders for each program initiative will review and evaluate progress, and provide annual input through the College's AA/EO Five Year Plan Annual Update.

**Program 2: Increase the numbers of African American, Hmong, and Hispanic students enrolling at FVTC directly from high school.**

A longstanding partnership between FVTC and Appleton Area School District underscores the importance of recruitment efforts specifically targeting African American, Hmong, and Hispanic high school students. This partnership involves three shared cultural liaison staff members that work with minority students at all grade levels, with particular focus on Appleton West, North and East students who are preparing to graduate. While the partnership with AASD is strong, FVTC does not provide similar services at other district high schools that target minority students. This initiative will identify baseline numbers of minority students in the FVTC district, as well as baseline percentages of students that enroll at FVTC directly from high school. An action plan will be developed that target minority high school students for enrollment into FVTC.

Activity / Steps	Persons Responsible for Implementation	Timetable
Utilize existing data to establish baselines of African American, Hmong, and Hispanic students who enroll at FVTC directly from high school. Identify high schools with the most opportunities to increase numbers. Establish target student numbers for the subsequent four years.	Multicultural Student Services, Recruitment Team, AASD Cultural Liaisons	2014-2015
Develop an action plan for meeting target numbers of African American, Hmong, and Hispanic students who enroll at FVTC directly from high school. Complete activities as outlined in plan to meet target numbers.	Multicultural Student Services, Recruitment Team, AASD Cultural Liaisons	2015-2016
Complete action plan activities as outlined to meet target numbers.	Multicultural Student Services, Recruitment Team, AASD Cultural Liaisons	2016-2017
Complete action plan activities as outlined to meet target numbers.	Multicultural Student Services, Recruitment Team, AASD Cultural Liaisons	2017-2018
Complete action plan activities as outlined to meet target numbers.	Multicultural Student Services, Recruitment Team, AASD Cultural Liaisons	2018-2019

**Method of Evaluation:**

Data will be examined in Year 1 to identify district baseline numbers of minority students that enroll at FVTC directly from high school. Target numbers will be established for Years 2-5 to improve the number of minority students that enroll directly from high schools other than AASD. Data and target numbers will be evaluated each year to ensure data integrity, as well as the appropriateness of the targets. Increases in numbers of minority students who come directly to FVTC after high school will indicate success. Key stakeholders for each program initiative will review and evaluate progress, and provide annual input through the College’s AA/EO Five Year Plan Annual Update.

**Program 3: Increase the number of recruitment outreach activities to district veterans**

FVTC provides significant levels of support for veterans once they walk in the doors of the college. The support includes all aspects of benefits for tuition and living expenses, as well as acclimating to the college and retention initiatives. An area of opportunity for the college involves reaching more veterans in the communities served by FVTC and encouraging more veterans to attend school. This initiative will involve efforts to increase the engagement of the college with the major agencies that serve veterans in the community.



Activity / Steps	Persons Responsible for Implementation	Timetable
Using the local outreach resources, identify the likely numbers of veterans who are living and working in the FVTC district. Identify the top three agencies or organizations where recruitment efforts would likely be most fruitful.	Veterans Support Specialist, Veterans Education Benefits Specialists, Recruiters	2014-2015
Develop an action plan that maximizes resources, and establishes partnerships with the top key agencies in the district that serve veterans. As a part of the action plan, identify target numbers of veterans who will enroll at FVTC years 2-5.	Veterans Support Specialist, Veterans Education Benefits Specialists, Recruiters	2015-2016
Complete action plan activities as outlined to meet target numbers.	Veterans Support Specialist, Veterans Education Benefits Specialists, Recruiters	2016-2017
Complete action plan activities as outlined to meet target numbers.	Veterans Support Specialist, Veterans Education Benefits Specialists, Recruiters	2017-2018
Complete action plan activities as outlined to meet target numbers.	Veterans Support Specialist, Veterans Education Benefits Specialists, Recruiters	2018-2019

**Method of Evaluation:**

Year 1 measure of success will be to identify the agencies with which to build sustained relationships, and the following year success will be attained by building positive, productive relationships with these agencies toward common goals. In general, increased numbers of veterans as well as referrals from the identified agencies will indicate success.

***Program 4: Increase the percentages of minority students that receive scholarships from the FVTC Foundation.***

The FVTC Foundation provides over \$600,000 annually in scholarships to FVTC program students. Minority student scholarship applications and recipients are disproportionately lower in percentages than the general population, and there is not a good grasp on why students don't apply. This initiative will examine the demographics of scholarship applicants and recipients, and identify areas that have lower percentages of minority student groups. Outreach efforts and assistance with applications for scholarships will be used as part of an action plan to impact percentages.

Activity / Steps	Persons Responsible for Implementation	Timetable
Utilize existing data to identify the ethnicity of scholarship applicants and recipients. Identify which groups apply and receive scholarships at the lowest rates. Establish target percentages and develop an action plan to impact the numbers and percentages of minority students to increase participation rates.	Multicultural Student Services, FVTC Foundation	2014-2015
Complete action plan activities as outlined to meet target numbers.	Multicultural Student Services, FVTC Foundation	2015-2016
Complete action plan activities as outlined to meet target numbers.	Multicultural Student Services, FVTC Foundation	2016-2017
Complete action plan activities as outlined to meet target numbers.	Multicultural Student Services, FVTC Foundation	2017-2018

Complete action plan activities as outlined to meet target numbers.	Multicultural Student Services, FVTC Foundation	2018-2019
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**Method of Evaluation:**

Each year the number of available scholarships will be evaluated against the available numbers at the beginning of the 2014-15 school year. Increased multicultural and minority students will be a general indicator of success. This program initiative will be evaluated and reviewed annually through the College's AA/EO Five Year Plan Annual Updates.

**Annual Progress: (Give a (cumulative) report by each year of the 5 year plan.)**

**2014-2015:**

**2015-2016:**

**2016-2017:**

**2017-2018:**

**2018-2019: Final Summary Report**

## SECTION VI

### Student Program Affirmative Action Initiatives

#### *Completion Rates*

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***Program 1: Maintain improved year over year retention rates for African American students***

Based on current data, African American men and women are least likely of any student group to complete programs and earn credentials. Over the last two years, significant efforts have been put toward case management and proactive engagement of African American men and women as the result of a grant. Without continued case management and programs focusing on student success, the improved retention rates that were realized as a result of the Great Lakes grant will return to the previous levels. This initiative will maintain the focus on African American men and women, capitalizing on the best practices learned over the last two years.

Activity / Steps	Persons Responsible for Implementation	Timetable
Complete grant requirements, to include identification of best practices and an average year over year retention rate for African American students. Establish the average retention rate as the baseline going forward, and an action plan to maintain target retention rate.	Multicultural Student Services, Retention Coordinators	2014-2015
Complete action plan activities to meet target.	Multicultural Student Services, Retention Coordinators	2015-2016
Complete action plan activities to meet target.	Multicultural Student Services, Retention Coordinators	2016-2017
Complete action plan activities to meet target.	Multicultural Student Services, Retention Coordinators	2017-2018
Complete action plan activities to meet target.	Multicultural Student Services, Retention Coordinators	2018-2019

**Method of Evaluation:**

Year over year retention rates for African American students will be calculated for the prior two years as a result of the grant activities. An average retention rate will be used as a baseline for this initiative. Success will be recognized by meeting or exceeding target retention rate.

***Program 2: Implement one-on-one and one-to-many retention strategies designed to target student veterans.***

Fall-to-fall persistence and 3-year graduation rates for veterans has been lagging behind those of the FVTC general population for the last three years. Veterans coming into the college experience a wide variety of barriers that make it difficult to stay in school. Targeted efforts designed to impact retention are critical, as well as measuring efforts and altering activities according to whether or not they are helping to increase retention.

Activity / Steps	Persons Responsible for Implementation	Timetable
Utilize existing data to identify current retention rates for veteran students at FVTC. Establish target retention rates for the next four academic years, along with action plan activities to reach targets.	Veteran Education Benefits Specialists, Veteran Support Specialist, Retention Coordinators	2014-2015
Complete action plan activities to meet target.	Veteran Education Benefits Specialists, Veteran Support Specialist, Retention Coordinators	2015-2016
Complete action plan activities to meet target.	Veteran Education Benefits Specialists, Veteran Support Specialist, Retention Coordinators	2016-2017
Complete action plan activities to meet target.	Veteran Education Benefits Specialists, Veteran Support Specialist, Retention Coordinators	2017-2018
Complete action plan activities to meet target.	Veteran Education Benefits Specialists, Veteran Support Specialist, Retention Coordinators	2018-2019

**Method of Evaluation:**

Year over year retention rates for veteran students will be examined for the prior three years and the average fall-to-fall retention rates will be used as a baseline for this initiative. Success will be recognized by meeting or exceeding target retention rate.

***Program 3: Increase completion rates for ELL and minority Adult Basic Education students who transition into programs.***

English Language Learners or minority students who complete Adult Basic Education and a GED/HSED transition into programs at very low rates (being addressed in Enrollment Program 1. Those that do transition into programs have almost no chance of persisting to complete a program. This initiative will utilize data to identify what the current state is relative to program completion, as well as support activities to improve the retention rates.

Activity / Steps	Persons Responsible for Implementation	Timetable
Identify current retention rates by student groups for minority ELL or ABE completers who transition into programs. Establish target retention rates for each year, as well as an action plan to positively impact persistence.	ELL and ABE instructors, Multicultural Student Services, Retention Coordinators	2014-2015
Complete action plan activities to meet target.	ELL and ABE instructors, Multicultural Student Services, Retention Coordinators	2015-2016
Complete action plan activities to meet target.	ELL and ABE instructors, Multicultural Student Services, Retention Coordinators	2016-2017
Complete action plan activities to meet target.	ELL and ABE instructors, Multicultural Student Services, Retention Coordinators	2017-2018
Complete action plan activities to meet target.	ELL and ABE instructors, Multicultural Student Services, Retention Coordinators	2018-2019

**Method of Evaluation:**

Year over year retention rates for ELL and ABE completers who transition into programs will be examined for the prior three years and the average fall-to-fall retention rates will be used as a baseline for this initiative. Success will be recognized by meeting or exceeding target retention rate.

**Annual Progress: (Give a (cumulative) report by each year of the 5 year plan.)****2014-2015:****2015-2016:****2016-2017:****2017-2018:****2018-2019: Final Summary Report**

## SECTION VI

### Student Program Affirmative Action Initiatives

#### *Student Counseling*

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Closer working relationships among and between FVTC student services departments have resulted in minority students more readily accessing Counseling and Advising Services. It is currently uncertain how “minority friendly” these services are, and how many students are accessing. This initiative will use internal resources to examine processes and services in terms of usage by minority students to include how the department communicates with the Multicultural Student Services and minority students, and the numbers of students that utilize the services.

<b>Activity / Steps</b>	<b>Persons Responsible for Implementation</b>	<b>Timetable</b>
Utilize existing data to identify the numbers of minority students that use services in Counseling and Advising Services. Develop an action plan to establish target numbers, as well as examine processes that encourage students to use the services.	Counseling and Advising Services, Multicultural Student Services	2014-2015
Complete action plan activities to meet target.	Counseling and Advising Services, Multicultural Student Services	2015-2016
Complete action plan activities to meet target.	Counseling and Advising Services, Multicultural Student Services	2016-2017
Complete action plan activities to meet target.	Counseling and Advising Services, Multicultural Student Services	2017-2018
Complete action plan activities to meet target.	Counseling and Advising Services, Multicultural Student Services	2018-2019

**Method of Evaluation:**

Target numbers of minority students utilizing Counseling and Advising Services will be established, and in general, increased numbers will indicate success. Additionally, communication, processes, and other methodologies will be examined to identify barriers to accessing the services. As necessary, improvements or changes based on staff and student feedback will be made in an effort to impact service numbers.

**Annual Progress: (Give a (cumulative) report by each year of the 5 year plan.)**

**2014-2015:**

**2015-2016:**

**2016-2017:**

**2017-2018:**

**2018-2019: Final Summary Report**

# EEOC Reporting Categories

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- 1 = **ADMINISTRATIVE.** Include persons whose assignments require primary (and major) responsibility for management of the institution, or a customarily recognized department or subdivision thereof. Assignments require the performance of work directly related to management policies or general business operations of the institution, department or subdivision, etc. It is assumed that assignments in this category customarily and regularly require the incumbent to exercise discretion and independent judgment, and to direct the work of others. Report in this category all officers holding such titles as Director or Administrator or the equivalent. Report in this category Deans, Directors, or the equivalents, as well as Associate Deans, Assistant Deans, and executive officers of academic departments (chairpersons, heads or equivalents) if their principal activity is administrative. Also include supervisors of professional employees.
- 2 = **FACULTY.** Include all persons whose specific assignments customarily are made for the purpose of conducting instruction, research, or public service as a principal activity (or activities), and now hold academic rank titles of professor, associate professor, assistant professor, instructor, lecturer, or the equivalent of any one of these academic ranks. Report in this category Deans, Directors, or the equivalents, as well as Associate Deans, Assistant Deans, and executive officers of academic departments (chairpersons, heads, or the equivalent) if their principal activity is instructional. Do not include student teaching or research assistants.
- 3 = **PROFESSIONAL NON-FACULTY.** Include persons whose assignments would require either college graduation or experience of such kind and amount as to provide a comparable background. Included would be all staff members with assignments requiring specialized professional training who should not be reported under Executive (1) and who should not be classified under any of the four "non professional" categories of activities.
- 4 = **CLERICAL / SECRETARIAL.** Include persons whose assignments typically are associated with clerical activities, or are specifically of a secretarial nature. Include personnel who are responsible for internal and external communications, recording and retrieval of data (other than computer programmers) and/or information and other paperwork required in an office, such as bookkeepers, stenographers, clerk typists, office machine operators, statistical clerks, payroll clerks, etc. Also include sales clerks such as those employed full-time in the bookstore, and library clerks who are not recognized as librarians.
- 5 = **TECHNICAL / PARAPROFESSIONAL.** Include persons whose assignments require specialized knowledge or skills which may be acquired through experience or academic work such as is offered in many two-year technical institutes, junior colleges or through equivalent on-the-job training. Include computer programmers and operators, drafters, engineering aides, junior engineers, mathematical aides, licensed practical or vocational nurses, dietitians, photographers, radio operators, scientific assistants, technical illustrators, technicians (medical, dental, electronic, physical sciences), and similar occupations not properly classifiable in other occupational-activity categories but which are institutionally defined as technical assignments. Include persons who perform some of the duties of a professional or technician in a supportive role, which usually require less formal training and/or experience normally required for professional or technical status.
- 6 = **SKILLED CRAFTS.** Include persons whose assignments typically require special manual skills and a thorough and comprehensive knowledge of the processes involved in the work, acquired through on-the-job training and experience or through apprenticeship or other formal training programs. Include mechanics and repairers, electricians, stationary engineers, skilled machinists, carpenters, compositors and typesetters.
- 7 = **SERVICE / MAINTENANCE.** Include persons whose assignments require limited degrees of previously acquired skills and knowledge, and in which workers perform duties which result in or contribute to the comfort, convenience and hygiene of personnel and the student body or which contribute to the upkeep and care of buildings, facilities or grounds of the institutional property. Include chauffeurs, laundry and dry cleaning operatives, cafeteria and restaurant workers, truck drivers, bus drivers, garage laborers, custodial personnel, gardeners and groundskeepers, refuse collectors, construction laborers, security personnel.

**VOLUNTARY COMPLIANCE PLAN FOR  
CAREER AND TECHNICAL EDUCATION PROGRAMS**

**NAME OF DISTRICT:**

**DATE OF SUBMISSION:**

**NON-COMPLIANCE ITEM AND REGULATION:**

**OBJECTIVE(S):**

Compliance			Required Resources		MONITORING & EVALUATION	
Activity/Steps	Beginning Timeline(s)	Person Responsible for Implementation	Resources	Date(s) for Completion	Product(s) Outcome(s)	Date(s) for Review by WTCSB Staff