

St. Louis Community College

AFFIRMATIVE ACTION PLAN

July 1, 2016 - June 30, 2017



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Greetings,

St. Louis Community College offers equal opportunities to all of its employees and applicants. We recruit, hire and promote employees and administer employee benefits programs without regard to race, color, religion, sex, sexual orientation, national origin, ethnicity, age, genetic information, disability or status as a Vietnam era veteran or a disabled veteran.

St. Louis Community College reaffirms its commitment to equal employment opportunity and reminds all employees and applicants that these objectives are reflected in all aspects of our daily operations. We continue to work diligently to foster sound practices in all matters pertaining to Equal Employment Opportunity and Affirmative Action laws and policies in our recruiting, hiring, training, compensation, benefits, promotions, transfers, layoffs, and institutionally-sponsored social, recreational and outreach programs.

In accordance with policy, employees must conduct themselves in a way that is free from discriminatory and unfair practices and free from behavior that is sexually or racially harassing. Such behavior detracts from a full commitment to the College's equal employment opportunity and affirmative action policies. Periodically, personnel actions are reviewed to ensure compliance with policy and create an environment that is free from harassment/bullying and/or retaliation.

St. Louis Community College will provide equal opportunity in all terms and conditions of employment for all persons. The College prohibits discrimination and promotes the full realization of Equal Employment Opportunity through a continuing district-wide affirmative action commitment. This policy applies to, and must be an integral part of, every aspect of personnel policy and practice in the employment, development, advancement and treatment of employees and applicants for employment. Our human resources functions are coordinated and administered centrally, at the Cosand Center. However, the data and narrative of this Affirmative Action Plan (AAP) includes all of our campuses, educational centers, and the administrative office and the corporate college for continuing education and workforce development.

The Office of the Associate Vice Chancellor of Human Resources and the Manager of Talent Management are responsible for reporting and monitoring our compliance with the applicable laws and regulations. The Manager of Talent Management has been assigned to direct and oversee the establishment of the affirmative action plans. Should you have questions regarding our AAPs or wish to view the available portions of the plans, please contact the Manager of Talent Management to schedule an appointment during normal business hours. The Manager of Talent Management is located at the Cosand Center, 300 S. Broadway, St. Louis, MO 63102. An abbreviated version of the AAP is also available on our Intranet and Internet.

Sincerely,

Jeff L. Pittman
Chancellor

INTRODUCTION

St. Louis Community College is a four-campus public, co-educational college supported by local taxes, state funds, student tuition, and maintenance fees. The College system was established by area voters residing in St. Louis City and St. Louis County, in 1962. The College's programs include courses for college transfer, associate degrees, personal development, continuing education, and corporate training at its four campuses, education centers, and other locations throughout St. Louis City and County. Since the College opened, over a million students have taken courses. The College also provides businesses, industries and community organizations with training and consulting services through the Workforce Solutions Group affiliated with the Corporate College.

St. Louis Community College is accredited by the Higher Learning Commission of the North Central Association. The College also is a member of the League for Innovation in Community Colleges.

St. Louis Community College recognizes the dignity worth of all human beings and is committed to its role as an advocate for personal and community development. To this end, the College pursues a proactive approach to extending educational opportunities to all. The College believes that education should be a rewarding experience offered in an environment that fosters the development of both the individual learner and the community it serves.

To enhance its overall relationship with the metropolitan area, the College system is strongly committed to providing access for members of all minority groups, particularly for women and minority populations within its service area, emphasizing and fostering cultural pluralism, enhancing the traditions of culture and language, encouraging the development of economic opportunities, providing appropriate academic support programs and ensuring equal opportunity for all persons who are, or may become, members of the College community.

St. Louis Community College complies with Titles VI and VII of the Civil Rights Act of 1964, Executive Orders 11246 and 11375, Title IX of the Education Amendment of 1972, Sections 503 and 504 of the Rehabilitation Act of 1973, Section 402 of the Vietnam Era Readjustment Act of 1974, the Age Discrimination in Employment Act of 1967, as amended in 1978 and 1986, the Immigration Reform Act of 1987, the Americans with Disabilities and Act of 1990, the ADA Amendments Act of 2008, and the Civil Rights Laws of the State of Missouri.

FEDERAL GRANTS

The federal grants displayed in the table below were awarded to St. Louis Community College as sole recipient during the fiscal year, July 1, 2016 through June 30, 2017. The grants constitute approximately 1.1% of the College’s general operating revenues for 2016-2017. The percentage is based on the Net Position; End of Year total, \$126,032,903, documented on page 19 of the Board approved Financial Statements June 30, 2017 and 2016.

FY17 FEDERAL GRANTS AWARDED TO STLCC AS SOLE RECIPIENT		
Source	Project	Funding
U.S. Department of Education	Child Care Access Means Parents in School (CCAMPIS)	\$ 300,000.00
U.S. Department of Education	TRiO Student Support Services Florissant Valley	\$ 238,035.00
U.S. Department of Education	TRiO Student Support Services Forest Park	\$ 219,575.00
U.S. Department of Education	TRiO Student Support Services Meramec	\$ 219,334.00
U.S. Department of Education	TRiO Upward Bound Forest Park	\$ 304,675.00
U.S. Department of Health and Human Services	Behavioral Health Workforce Education and Training (Substance Use Disorder)	\$ 70,904.00
TOTAL		\$1,352,523.00

60-2.21

DISSEMINATION OF POLICY

Internal Dissemination of Policy

1. The Affirmative Action Plan is available for review in the Human Resources Office located at the Cosand Center during normal business hours. We also have placed on our web site www.stlcc.edu and Intranet
2. We publish information about the College's affirmative action and equal opportunity programs. This information features both, men and women, minorities and non-minorities and are available on our web site.
3. We may conduct meetings with administrators and supervisors, on an as-needed basis, to explain the intent of our affirmative action policy and their individual responsibility for effective implementation.
4. We have meetings with members on some of the screening committees and/or employees to discuss policy and explain the individual employee responsibilities for Affirmative Action on an as-needed basis.
5. We communicate the affirmative action policy to new employees during new employee orientation as well as through posters displayed on bulletin boards in the business offices on all campuses, in the lobby, Human Resources department and lunch room at Cosand Center, and on our web site.
6. We provide employment screening committees with information relative to affirmative action. The Human Resources Department staff is available to discuss affirmative action issues at workshops and other staff development activities.
7. The bargaining units represent employees at the College. We provide all of them with a copy of the College's Equal Employment Policy and Affirmative Action Commitment and request their cooperation in the effective implementation of the Policy and Commitment. Resolutions Relating to Provisions of Board Policy are available via the Internet and Intranet. All bargaining unit documents contain a non-discrimination clause. The Director, Labor and Employee Relations oversees the responsibilities with regard to the bargaining units.
8. We post the affirmative action policy and posters informing employees of their rights and responsibilities under the various federal and state laws on bulletin boards in the business offices at each campus, in the lobby, Human Resources and lunchrooms at the Cosand Center. Our policy, on our web site, states: *St. Louis Community College is An Equal Opportunity/Affirmative Action employer which values the diversity of its workforce.*

External Dissemination of Policy

1. We may hire our classified staff from the local community, in which there is a large population of African American and other minorities. When advertising for open positions, we state: *St. Louis Community College is An Equal Opportunity/Affirmative Action employer which values the diversity of its workforce.* We may search nationally for faculty, professional, and administrative positions.
2. All of our job openings are posted on our web site: www.stlcc.edu. We also list our job openings with the Missouri Job Center.
3. We have incorporated the EEO clause into our purchase orders and contracts as required by Executive Order 11246, as amended and its implementing regulations. Subcontractors, vendors and suppliers are aware of our EEO policy. (**Appendix A**)
4. Prospective employees are aware of our EEO policy because it is stated in our advertising, on our application form, on our web site, and in major College publications, such as course catalogs and the annual report. The course catalog and annual report receives internal and external distribution.
5. We feature both, men and women, minorities and non-minorities, in major college publications, such as catalogs and annual reports, both of which receive both internal and external distribution.
6. We do not use photographs in employment advertising and recruitment; however, photographs chosen for student recruitment or student information purposes portray women and minorities.
7. We have a workforce that is representative of the communities in which our campuses are located. We may use additional recruitment resources and/or community contacts. Our applicant flow is demographically balanced for all of our job groups.

60-2.22

RESPONSIBILITY FOR IMPLEMENTATION

- A. The Associate Vice Chancellor of Human Resources has the ultimate responsibility for the development and implementation of the Equal Opportunity Policy and the Affirmative Action Plan. Administrators and other supervisory personnel are responsible for implementing the program within their functional areas of responsibility. The Associate Vice Chancellor of Human Resources through the Manager of Talent Management, may assist them in the development of goals and timetables and in other areas as appropriate. The primary responsibility and accountability for Equal Employment Opportunity and Affirmative Action, however, belongs to the administrators at the College.
1. The responsibilities of the Manager of Talent Management include but are not limited to the following:
 - a. Recommending policy statements, developing the Affirmative Action Plan, communicating the college's affirmative action efforts internally and externally, as well as developing guidelines and forms and procedures to assist our managers in fulfilling their affirmative action responsibilities. We further implement our AAP by
 - 1) speaking to community organizations in which affirmative action in general and the College's program in particular are discussed and
 - 2) facilitating programs on preventing sexual and racial harassment and bullying. We also periodically provide management training on affirmative action and legal issues to faculty and staff.
 - b. Identifying problem areas through statistical analysis on availability, utilization, and personnel activity.
 - c. Assisting various levels of administration by reviewing hiring procedures and grievance procedures. We review our employment and recruitment procedures, and as needed, and meet with some of the screening committees to ensure that members of protected groups are considered for position in the district. We also discuss both, *ad hoc* and on a planned basis, affirmative action issues during meetings within the College.
 - d. Designing and implementing audit and reporting systems that will:
 - 1) measure the effectiveness of our program. Implementation includes developing an annual Affirmative Action Report as requested.

This report includes a narrative analysis of our compliance with federal and state regulations, progress towards affirmative action goals and statistical data on the employment process and on employee complaints.

- 2) indicate a need for appropriate remedial action. If remedial action is required, the Human Resources department brings it to the attention of the Chancellor and other administrators so appropriate action can be addressed.
 - 3) determine the degree to which the goals and objectives are progressing. We review our availability data as needed and perform a utilization analysis annually. Based on these analyses, we project our goals and revise them annually.
- e. Serving as a liaison between St. Louis Community College and enforcement agencies. We comply with the laws enforced by the following agencies: the Equal Employment Opportunity Commission (EEOC), the Office of Federal Contract Compliance Programs (OFCCP), the Office of Civil Rights (OCR), and the Missouri Commission on Human Rights (MCHR). The Human Resources department and the office of the General Counsel serves as a liaison between the college and all of the above-named agencies.
 - f. Serving as a liaison between St. Louis Community College and minority organizations, women's organization, and community groups concerned with employment opportunities for minorities, women and individuals with disabilities. This work is illustrated by our speaking engagements and participation in panel discussions, attendance at conferences and other informal contacts.
 - g. Keeping administrators informed of the latest developments in the equal opportunity area by routing relevant articles regarding Equal Employment Opportunity and Affirmative Action to the appropriate administrators and writing advisory memoranda when necessary. The Leadership Team is the vehicle for distribution of this information, both written and verbal.
- B. Line responsibilities of the Manager of Talent Management include, but are not limited to the following:
1. Assisting administrators in identifying of problem areas and establishing goals and objectives.
 2. Actively involved with local minority and women's organizations and community action groups.

3. Auditing training programs periodically and of hiring and advancement patterns to remove impediments to the attaining of goals.
The Human Resources Department monitors the hiring of all personnel. The Associate Vice Chancellor of Human Resources serves as part of the chain of administrators who review all hires.
Promotions for faculty positions follow the procedures detailed in the *Joint Resolution Relating to Provisions of Board Policy Applicable to Full-Time Faculty*, Article XX, Faculty Promotion in Academic Rank. (**Appendix B**)
4. Discussing on an as-needed basis our AAP with academic administrators and staff supervisors to ensure adherence to our Affirmative Action policies.
5. Reviewing advertisements placed for all position vacancies.
6. Reviewing the qualifications of all employees to ensure fairness to females and minorities for transfers and advancements. Women and minorities are employed at all levels of our workforce.
7. Encouraging minorities and females to take advantage of opportunities for advancement. We post all position openings on our web site, unless waived in certain situations.
8. Providing information regarding the waiver of fees for tuition, which is available to all employees of the College.
9. Ensuring compliance through periodic audits with the following requirements:
 - a. Equal Employment Opportunity/Affirmative Action posters are displayed on bulletin boards at the Cosand Center and business offices on each campus.
 - b. We encourage all employees to participate in any and all programs and activities that we sponsor.
 - c. Restrooms are comparable for both sexes.
10. Administrators and supervisors understand that their adherence to St. Louis Community College's Equal Opportunity and Affirmative Action program is an integral part of their responsibilities. Overt expressions of racism and sexism are rare, and efforts are constantly being made to counter the more subtle aspects of these phenomena. The administrative approval process for hiring the employees ensures that administrators and supervisors incorporate Equal Employment Opportunity and Affirmative Action consideration into their decision-making process.
11. It is the responsibility of the administration to prevent the sexual misconduct of all employees.

Our Sexual Harassment Policy and Sexual Misconduct Guidelines are available to employees via the College's web sites and discussed at the New Employee Orientation. **(Appendix C)**

**IDENTIFICATION OF PROBLEM AREAS
BY ORGANIZATIONAL UNITS AND JOB GROUPS
(60-2.23)
FISCAL YEAR 2017**

The St. Louis Community College is a four-campus system (Florissant Valley, Forest Park, Meramec, and Wildwood) with an administrative office, educational centers, workforce solution group and other locations throughout the St. Louis metropolitan area. The Corporate College was added in 2014. The hiring for full time and part-time positions is coordinated at the Cosand Center. (For a description of the hiring procedure, see **Appendix D**) Because the hiring function is decentralized, we aggregated the job groups, availability data, analytical data, and goals for the combined campuses and administrative center. Then, we dis-aggregated the Utilization Analysis because the campus presidents some years ago requested a detailed analysis of their own campus' employment profile. Goal responsibilities are assigned accordingly.

We do not have promotions in the traditional sense, although some employees in the administrative, clerical-skilled and technical skilled job groups formerly held positions in other positions and in the clerical-entry and technical-entry job groups. Faculty promotions are within academic departments such as from assistant to associate professor.

Goal responsibilities have been determined by campus because each campus organizes its academic disciplines somewhat differently. On the Forest Park campus, for example, music, art, and English are in separate departments. The faculty job groups are listed with the disciplines in each group in **Appendix E**.

We have combined disciplines when the numbers of incumbents are small and the availability similar. Disciplines were logically grouped together into job groups for meaningful statistical analysis.

For a description of how we determined the availability for each job group, see **Appendix F**, *Availability Factor Computation*. Please note that because of aggregating and dis-aggregating, the goals assigned to individual campuses may not equal the summary goal for the entire system. For staff availability, we applied census data from the EEO 2006-2010 American Community Survey (ACS) Custom Tabulation. For faculty availability, we used the National Science Foundation Report of Doctoral Recipients by Sub-field of Study, 2010, table #1 for sex and table #16 for minorities.

Applicant information is collected on a voluntary basis on the Demographic Data form (**Appendix G**) and maintained in the college's online applicant tracking system in order to comply with the Executive Order.

UTILIZATION ANALYSIS

The IT department supplied data as of June 30, 2017 for the *Utilization Analysis*. The total head count was 1818, down from 2102 in 2016.

UTILIZATION ANALYSIS NARRATIVE

OFFICIALS AND MANAGERS

We divided this job group into Officials and Managers (upper level) and Officials and Managers (middle level). There are 39 employees in the upper level officials and managers job group and 143 in the mid-level group. We may recruit nationally for some of these positions and have weighed the availability factors accordingly. Minority employees work in a variety of administrative positions and comprise 28% of the persons in this job group. Females comprise 59% and 74% in Officials and Managers - Mid. The percentage of both females and minorities has been stable for the last several years. We are fully utilized in both the upper and mid-level job groups. It is our intention to maintain the current level of representation in this group.

PROFESSIONAL NON-FACULTY

Professional, non-faculty, positions require a degree and/or equivalent experience. These factors are not adequately measured by the general population or labor force and are factors which were not given significant weight in determining availability. An analysis of current employees in this job group indicates that substantial weight should be placed on the availability of minority and female employees with the requisite skills in the St. Louis area.

This job group had 163 employees in 2016 and 181 in 2017. It is fully utilized as to both females and minorities.

FACULTY JOB GROUPS

In determining the availability for the faculty job groups, we first divided the faculty by discipline – into subject-matter-related job groups. We weighted external availability higher because most faculty members are hired from external searches. We also addressed the percentage of minorities and females among those promotable or transferable within the job group. Since the faculty line of progression begins at the instructor and assistant professor rank and continues to the rank of full professor, we have weighted promotions significantly. Note that when faculty members are promoted, they remain in the same job group because of the discipline/subject matter nature of our job groups. For more detail, see **Appendix E**.

FEMALE UNDERUTILIZATION

We are fully utilized in the female representation in the Allied Health and Business departments. We have set the following goals to increase female faculty representation in other job groups. Arts & Humanities: Florissant Valley - five (5); Meramec - six (6). Business: Forest Park - one (1). Human Sciences - Forest Park - three (3). Science & Math: Forest Park - two (2).

MINORITY UNDER UTILIZATION

We have set the following goals to improve our minority representation. Allied Health: Florissant Valley - two (2); Forest Park - two (2). Arts and Humanities: Meramec - two (2); Social Sciences: Meramec - two (2).

We continue to review the percentage of minorities applying for faculty positions and compare this with their availability in the workforce. Our efforts to collect accurate demographic data on applicants help us determine which of our recruiting sources are most effective, particularly in producing sufficient quantities of minority applicants in areas in which we have identified underutilization. Since this information is voluntarily provided by applicants, it is unlikely that we will have complete data on every applicant.

TECHNICAL: SKILLED

Employees in this job group may be recruited locally; the positions have specialized requirements. Employees in this job group may have previously been in the Technical: Entry job group; however, employees are not necessarily promoted Entry to Skilled job group.

We have 74 employees in this job group in 2017. We remain under utilized in females and have set the following goals: Cosand Center - one (1); Florissant Valley - eleven (11); Forest Park - eight (8); Meramec - ten (10).

We have corrected our underutilization of minorities and are now fully utilized in this job group.

TECHNICAL: ENTRY & PART-TIME

Entry employees may be hired externally and our availability computation reflects that practice. We have met a number of goals for minority representation in this job group and have decreased our goals accordingly. However, we remain under utilized in both females and minorities and have set our female goals as follows: Cosand Center - one (1); Florissant Valley - one (1); Forest Park -three (3). Our goal for minorities is: Corporate College - one (1).

OFFICE AND CLERICAL

Clerical employees are divided into Entry and Skilled job groups. Some employees in the Skilled job group have held positions in the Entry job group; however, we do not have promotions in the traditional sense.

The Districtwide Utilization Analysis indicates 114 employees in the Skilled group, down from 197 in 2016. We identified under utilization of minorities only on the Meramec campus, where we have set a goal of four (4).

We have 453 employees in the Entry job group (which includes part time clerical employees), down from 518 in 2016. Forty five (45%) per cent of the incumbents in this job group are members of minority groups, substantially above the 22.5% availability.

This traditionally is a female job group, and we have not set goals to correct the stated female underutilization.

SKILLED CRAFT

Employees in this job group are recruited and may be hired from the local labor pool. We have weighted the labor market information accordingly.

The Utilization Analysis indicates that we are not under-utilized as to either females or minorities.

SERVICE WORKERS

The majority of the employees in the Entry job groups may be hired from the local labor pool, and the availability is weighted accordingly. Employees in the Skilled job group may have held jobs in the Entry job group. In 2017, we had 41 employees in the Skilled group and 82 in the Entry group.

Past and current utilization analyses have indicated under utilization of both females and minorities in these job groups. Female goals in the Skilled job group are: Florissant Valley - six (6); Meramec – two (2).. We have assigned minority goals in the Skilled job group to Florissant Valley - two (2).

We increased our utilization of minorities in the Entry job group and are no longer under utilized. We have set the following goals in the Entry job group for females: Florissant Valley - two (2); Forest Park - two (2); Meramec - two (2).

60-2.24

DEVELOPMENT AND EXECUTION OF ACTION-ORIENTED PROGRAMS

- A. In the fall of 1988, the College adopted a formal job classification system. This system allows for periodic reviews of both the positions and the job descriptions that accompany them to ensure congruency between these documents and the actual functions of the positions. There are no jobs where sex is a bonafide occupational qualification (BFOQ).
- B. We have evaluated our total selection process to insure that it is free from bias and that it adheres to the following procedures in the areas of recruiting, training and development, and related personnel actions:
1. To ensure an adequate pool of minority and female applicants, the College posts our job openings on our web site: www.stlcc.edu and lists our job openings with the Career Centers at Missouri Employment. We advertise for faculty and administrative positions with the *Chronicle of Higher Education*, *Diversity Issues* and the *St. Louis American*, just to name a few.

Male and female students, as well as minority students, can participate in the College's work-study program on all of our campuses during the academic year and the summer session.

Opportunities for professional development for faculty, administrators, classified staff, and physical plant staff are administered without regard to race, color, religion, sex, sexual orientation, national origin, age, genetic information or disability.

2. We have reviewed our application form and have removed any possible discriminatory questions so that it conforms with the regulations of the EEOC and the OFCCP.
3. In general, we do not use tests in the hiring and selection process. We administer a skills assessment to applicants for clerical positions. Applicants for faculty positions may be asked to create and teach a "mock" class assignment(s).
4. The responsibility for hiring employees without discrimination ultimately is the responsibility of the chief administrator at each of our locations. The Human Resources Administrator monitors their choices. We offer training programs for our administrators; they are aware of our commitment to affirmative action and are supportive of that commitment in their personnel decisions.
5. We ensure that all employees are given an equal opportunity for advancement by posting job openings on the College's web site – www.stlcc.edu.

Employees who wish to be considered for employment must apply for these positions using the College's online applicant tracking system (OATS). We use a similar process for transfers in accordance with the College's board policy, C. 6, Transfers.

6. We hire, promote, transfer, terminate employees, renew employment contracts and provide salary increases in accordance with our procedures without regard to race, color, religion, sex, sexual orientation, national origin, age, genetic information, or disability. We administer opportunities for professional development without regard to race, color, religion, sex, national origin, age, or disability.
7. We provide all employees with professional development opportunities and appropriate on-the-job training to new hires and those advanced to a new position.
8. We provide professional development opportunities for faculty, administrators, professional, classified staff and physical plant staff; these opportunities are provided without regard to race, color, religion, sex, sexual orientation, national origin, age, genetic information or disability.
9. We formally evaluate the performance all employees annually.
10. Our employment selection process is governed by Board Policy as described in **Appendix D.**

60-2.25

INTERNAL AUDIT AND REPORTING SYSTEMS

- A. The College's auditing and reporting system is designed to measure the effectiveness of the Affirmative Action Program, to indicate those areas where remedial action is needed and to determine the degree to which the goals have been reached.
- B. The Office of the Associate Vice Chancellor of Human Resources, through its Manager of Talent Management, is responsible for auditing and reporting on the College's Affirmative Action Plan. When warranted, a progress report that includes recommendations for remedial action for the Associate Vice Chancellor of Human Resource is prepared.
- C. The Office of Human Resources maintains the following reports:
- VETS - 4212
 - Workforce Analysis
 - Utilization Analysis
 - Summary Profile of Employees
 - Goal Achievement Report
 - Grievances and Complaints Summary
 - Applicant Flow Data by Demographic Group
 - Summary of Personnel Activity Data
- D. In addition, the Manager of Talent Management
1. Monitors records of all personnel activity, including referrals, placements, transfers, advancements, terminations, and compensation at all levels to ensure that the non-discrimination policy is carried out.
 2. Requires internal reporting as to the degree to which equal employment opportunity and organizational objectives are attained.
 3. Reviews report results with all levels of management.
 4. Advises top management of program effectiveness and submits recommendations to improve unsatisfactory performance.
- E. The Institutional Research and Planning Department prepares and maintains the Integrated Post-secondary Education Data System (IPEDS) Report.

60-2.26

ACTION ORIENTED PROGRAMS

- A. We continue to develop outreach programs to encourage employment of women and minorities in our job groups. We describe our employment process in **Appendix D**.
- B. We encourage all employees to participate in work-related activities that will enhance their professional development.
- C. We provide on-the-job training for our employees. Some classifications provide on-the-job training that qualifies incumbents for higher level positions.
- D. We continue to work to enhance participation of women and minorities in all of our job groups and to demonstrate sensitivity to their particular concerns and culture. We will continue to implement reasonable and cost effective programs which demonstrate our commitment to equal employment opportunity and affirmative action.

- E. We publicize the achievements of minorities and female employees in both internal and external college publications.
- F. The College values the uniqueness of our faculty, staff, and students, and strives to provide an environment where the lives and feelings of everyone are appreciated. In 2003, we developed Diversity I Training, which was offered district-wide to new hires and existing employees. Presently it is offered only to new employees during their orientation. Diversity I Training is designed to increase the awareness of differences and assist in the development of a common ground on which to interact with one another in the workplace and community.

Beginning in 2007, Diversity II Training was created and offered to existing employees. This program was developed based on feedback from employees to address the issue of white privilege.

In 2013, the College addressed Title IX Coordination. These responsibilities are bifurcated: The Manager of Talent Management handles complaints of sexual misconduct and sexual assault that involve employees. The Director of Student Conduct/Title IX Coordinator reports to the Vice Chancellor for Student Affairs and oversees complaints brought by students in conjunction with the Title IX Investigators on the campuses. The Director of Student Conduct/Title IX Coordinator is responsible for district-wide Title IX compliance.

May 2016, the College hired the Director, Diversity and Inclusion. The Director, Diversity and Inclusion has responsibility for guiding efforts to conceptualize, define, assess, nurture, and cultivate diversity as an institutional and educational resource, while providing creative leadership to enable the college to become more diverse and inclusive in its workforce, learning environments, programs, services and partnerships and is responsible for providing oversight and coordination for Affirmative Action and Equal Employment Opportunity programs and compliance with federal and state laws.

St. Louis Community College aims to take the lead in providing an environment of diversity, inclusion, equity and justice for our students, faculty, staff and community partners. This Diversity and Inclusion Action Plan is the result of the collaborative efforts of the college's Diversity Council, which consists of a cross section of members throughout the District. The plan focuses on four areas: Institutional Transformation, The Student Experience, Community Partnerships and Marketing/Communications. It is important to note that this Diversity and Inclusion Action Plan is more than a "to-do list." It is a blueprint that will transform the way St. Louis Community College engages in the business of diversity and inclusion. Moreover, it is evidence to our region that there is, "So Much More" to St. Louis Community College.

STLCC has a District-wide Diversity and Inclusion Council and each of the four campuses has a Diversity and Inclusion Committee. The Council as well as the Committees each play a role in ensuring that the Diversity and Inclusion Action Plan is meaningful and purposeful. Through the Office of Diversity and Inclusion, programming related to unconscious bias, and other topics is provided to new employees on a monthly basis as well as to screening committees prior to the selection of candidates.

60-2.13(j)

CONSIDERATION OF PERSONS NOT CURRENTLY IN THE WORKFORCE

- A. We consider minorities and females not currently in the workforce for positions for which they qualify.
- B. We consider service to the community as a relevant part of an applicant's qualifications.
- C. Our employment policies and procedures are described in **Appendix D** of this Plan and are designed to attract persons not currently in the workforce.
- D. We continue to provide campus-based programs such as High School Equivalency Test (HiSET), formerly (GED) and English as a Second Language (ESL) and the Community Service unit of the Workforce Solutions Group— all of which focus on assistance for persons to be in in the workforce.
- 5. We provide childcare services for the children of students, faculty and staff when classes are in session. These services are also open to the public. Students enrolled in the child care curriculum have priority at the Child Care Development Center on the Florissant Valley campus.

Guidelines on Sex Discrimination

- A. The St. Louis Community College complies with Sex Discrimination Guidelines promulgated by the Office of Federal Contract Compliance Programs (OFCCP) and the Equal Employment Opportunity Commission (EEOC) as well as with the Title IX Guidelines promulgated by the Office of Civil Rights (OCR).
- B. Opportunities for students, employees, and prospective employees are available without regard to sex. The College system has:
1. No positions on any of the campuses, education centers, associated locations or at the Cosand Center, for which sex is a bona fide occupational qualification (BFOQ). Applicants of both sexes are considered for all positions for which they are qualified.
 2. Our personnel policies and employee benefits are administered without regard to sex. The College's benefits program regarding pregnancy, leaves of absence for maternity purposes and medical benefits complies with the amendments to Title VII and all provisions of the Family and Medical Leave Act. Women are not penalized for time away from work due to childbearing. Leaves of absence due to childbearing are routinely granted and, whenever possible, the employee returns her former position without loss of service credits.
 3. We make no distinctions between married and unmarried persons on the basis of sex.
 4. Restroom facilities at our campuses, education centers and associated locations are adequate for persons of both sexes.
 5. The Sexual Harassment Policy is included as **Appendix C**. This policy was written and implemented in the spring of 1989 to address sexual harassment and its prevention.

60-60

**GUIDELINES REGARDING DISCRIMINATION
ON THE BASIS OF RELIGION OR NATIONAL ORIGIN**

We will not discriminate against any employee or applicant for employment because of religion or national origin. We will make reasonable accommodations to the religious beliefs and practices of employees and prospective employees.

60-250 and 60-741

DISCRIMINATION ON THE BASIS OF DISABILITY, DISABLED VETERAN & VIETNAM VETERAN STATUS

- A. St. Louis Community College's Affirmative Action Program regarding employees with disabilities, veterans with disabilities, and Vietnam Era veterans is herein integrated into this Affirmative Action Plan. The Affirmative Action Plan, updated annually, is available to any person wishing to review it. See the Dissemination of Policy section of this Plan.
- B. The College complies with Sections 503 and 504 of the Rehabilitation Act regarding persons with disabilities. We completed a self-evaluation in 1978 in accordance with the regulations in an effort to make all of our campuses physically accessible to students and employees with disabilities. We regularly make reasonable accommodations for the physical and mental limitations of qualified employees with disabilities. Our facilities are accessible to persons with disabilities.
- C. We include the affirmative action clause in all contracts and subcontracts and have communicated our policy to all of our bargaining units.
- D. We will not discriminate against and, in fact, will take affirmative action to ensure fair treatment for any student, applicant for admission, employee or applicant for employment who has a disability or is a disabled veteran or veteran of the Vietnam Era. All job openings are listed with the Career Centers at Missouri Employment and posted on our web site – www.stlcc.edu.
- E. Affirmative action applies to all employment practices listed in 60-250. The Manager of Talent Management routinely prepares reports on these personnel activities.
- F. We invite all employees with disabilities, disabled veterans and Vietnam Era veterans to identify themselves. We keep information that we obtain from applicants and employees concerning a mental condition or a physical condition confidential, except that:
 - 1. We inform supervisors and managers regarding accommodations or restrictions on work or duties;
 - 2. We inform first aid and safety personnel when, and to the extent appropriate, if the condition might require emergency treatment; and
 - 3. We inform government officials investigating compliance with the EEO laws.

- G. We review personnel processes to assure careful consideration of applicants and employees with disabilities, disabled veterans and Vietnam Era veterans.
- H. We review position descriptions for job-relatedness to ensure that applicants with disabilities who are disabled veterans are not screened out because of non-job-related qualifications. Such a review determines whether job qualifications are job-related and are consistent with business necessity and with the safe performance of the job.
- I. We make reasonable accommodations to the physical and mental limitations of employees or applicants.
- J. The College's curricula reflects our long-standing commitment to persons with disabilities: childcare emphasizes developmental disabilities; we offer course work in developmental disabilities and degree programs for occupational therapy assistants, physical therapy assistants, and interpreters for the hearing impaired. We also provide counselors, interpreters, readers, writers, tutors, nurses, and an Access Office on each campus to provide services to students with disabilities.
- K. The Americans with Disabilities Act was effective in 1990 and amended in 2008. The Department of Human Resources has reviewed all of our employment procedures to assure compliance, including modifying our employment application, developing and communicating employment guidelines, identifying essential functions of each position, and developing a grievance procedure.