

**EQUAL EMPLOYMENT OPPORTUNITY**  
**and**  
**STAFF DIVERSITY PLAN**

**Mendocino-Lake Community College District**



**2019-2022**

*Reviewed by EEO Advisory Committee: February 11, 2019 and March 4, 2019  
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## **Plan Component 1: Introduction**

The Mendocino-Lake Community College District Equal Employment Opportunity (EEO) Plan, which reflects the District's commitment to equal employment opportunity, was adopted by the Board on May 15, 2019. The 2018-19 District Priorities adopted by the Board of Trustees includes strengthening our inclusive, equitable, and ethnically diverse college culture to be more welcoming to all students and increase access and support for underrepresented students.

The goal of Mendocino College is to take active steps to ensure equal employment opportunity and to create a diverse work and academic environment that is welcoming and inclusive for all. Fostering diversity, promoting excellence, and providing a positive student learning experience is the primary focus of this endeavor. Through such an inclusive educational environment, our students will be better prepared to thrive in our diverse society.

The EEO Plan focuses on providing equal employment opportunity in the District's recruitment and hiring policies and practices pursuant to the applicable Regulations of the Board of Governors of the California Community Colleges (Title 5 of the California Code of Regulations, Sections 53000 et seq) and the steps the District shall take in the event of underrepresentation of monitored groups. It also includes a complaint procedure for noncompliance with the EEO Plan; the establishment of the Equal Employment Opportunity Advisory Committee; methods to support equal employment opportunity and an environment which is welcoming to all; and procedures for dissemination of the EEO Plan.

Mendocino College is proud to serve a large population of Native American students and is currently working toward being named a Native American Serving Institution, alongside our title as a Hispanic Serving Institution. We are also making progress through our current Student Equity model to further promote and ensure success for our diverse student population.

The Mendocino-Lake Community College District is committed to employing qualified administrators, faculty, and staff members who are dedicated to student success and to recruiting and hiring persons from diverse backgrounds. Diversity in the academic environment fosters cultural awareness, promotes mutual understanding and respect, and provides suitable role models for all students including first generation students, underrepresented students, and students of color. The District will strive to employ and retain faculty, staff and administrative personnel who promote a positive learning environment and are well prepared to serve our increasingly diverse student population.

*J. Arturo Reyes, Ed. D.*

J. Arturo Reyes, Superintendent/President

**Plan Component 2: Definitions**  
**CCR, Title 5, §53001**

1. *Adverse Impact* is a statistical measure (such as those outlined in the EEO Commission's *Uniform Guidelines on Employee Selection Procedures*) that is applied to the effects of a selection procedure and demonstrates a disproportionate negative impact on any group defined in terms of ethnic group identification, gender or disability. A disparity identified in a given selection process will not be considered to constitute adverse impact if the numbers involved are too small to permit a meaningful comparison.
2. *Business Necessity* means circumstances which justify an exception to the requirements of Section 53021(b)(1) because compliance with that section would result in substantial additional financial cost to the district or pose a significant threat to human life or safety. Business necessity requires greater financial cost than does mere business convenience. Business necessity does not exist where there is an alternative that will serve business needs equally well.
3. *Diversity* means broad inclusion in the employment environment that offers equality and respect for all persons. A diverse educational community recognizes the educational benefits that flow from employee populations that are varied by race, gender, disability status, belief, age, national origin, cultural background, life experiences and other enriching characteristics.
4. *Equal Employment Opportunity* means that all qualified individuals have a full and fair opportunity to compete for hiring and promotion and to enjoy the benefits of employment with the district. Equal employment opportunity should exist at all levels and in all job categories listed in Section 534004(a), namely: executive/administrative/managerial, faculty and other instructional staff, professional non-faculty, secretarial/clerical, technical and paraprofessional, skilled crafts, and service and maintenance. Equal employment opportunity also involves:
  - Identifying and eliminating barriers to employment that are not job related; and
  - Creating an environment which fosters cooperation, acceptance, democracy, and free expression of ideas and is welcoming to men and women, persons with disabilities, and individuals from all ethnic and other groups protected from discrimination pursuant to Government Code section 12940.
5. *Equal Opportunity Plan* is a written document in which a district's work force is analyzed and specific plans and procedures are set forth for ensuring equal employment opportunity.
6. *Equal Employment Opportunity Program* means all the various methods by which equal employment opportunity is ensured. Such methods include, but are not limited to, using nondiscriminatory employment practices, actively recruiting, monitoring, and taking additional steps consistent with the requirements of Section 53006 and this EEO Plan.
7. *Ethnic Group Identification* means an individual's identification in one or more of the ethnic Groups reported to the Chancellor pursuant to Section 53004. These groups shall be more specifically defined by the Chancellor consistent with state and federal law.

8. In-house or Promotional Only Hiring means that only existing district employees are allowed to apply for a position.
9. Monitored Groups means those groups identified in Section 54004(b) for which monitoring and reporting is required pursuant to Section 53004(a). Section 53004(b) indicates that data about employees and applicants should be collected and reported with respect to gender, ethnic group identification, and disability. Thus, monitored groups are men, women, American Indians or Alaskan natives, Asian or Pacific Islanders, Blacks/African Americans, Hispanics/Latinos, Caucasians, and persons with disabilities.
10. Person with a Disability means any person who (1) has a physical or mental impairment as defined in Government Code, Section 12926, which limits one or more of such person's major life activities, (2) has a record of such an impairment, or (3) is regarded as having such an impairment. A person with a disability is "limited" if the condition makes the achievement of the major life activity difficult. If the federal Americans with Disabilities Act of 1990 defines "disability" which results in a broader protection than would be available under California law, federal definitions will apply.
11. Reasonable accommodation means the efforts made on the part of the district to afford disabled applicants access to the job application process and disabled employees to perform the essential functions of their positions, consistent with the District's legal obligations under the Americans with Disabilities Act and the Fair Employment and Housing Act.
12. Screening or Section Procedure means any measure, combination of measures, or procedure used as a basis for any employment decision. Selection procedures include the full range of assessment techniques, including but not limited to, traditional paper and pencil tests, performance tests, and physical, educational, and work experience requirements, interviews, and review of application forms.
13. Significantly Underrepresented Group means any monitored group for which the percentage of persons from that group employed by the district in any job category listed in Section 53004(a) is below eight percent (80%) of the projected representation for that group in the job category in question.

All Section references are to Title 5 of The California Code of Regulations unless otherwise indicated.

**Plan Component 3: Policy Statement**  
**CCR, Title 5, §53002**

The Mendocino-Lake Community College District is committed to academic excellence and providing all students with the opportunity to succeed in their chosen educational pursuits. Academic excellence can best be sustained in a climate of acceptance and with the inclusion of persons from a wide variety of backgrounds and preparation who can provide services to an increasingly diverse student population. A workforce that is continually responsive to the needs of a diverse student population may be achieved by ensuring that all persons receive an equal opportunity to compete for employment and promotion and by eliminating barriers to equal employment opportunity. The District will strive to achieve a workforce reflective of the diversity of our student population.

It shall be the policy of the Mendocino-Lake Community College District that all qualified applicants and employees have equal opportunity to seek, obtain, hold, and advance in employment in the District, and are not subjected to discrimination on the basis of ethnic group identification, culture, socioeconomic level, color, national origin, religion, age, physical disability, mental disability, ancestry, sexual orientation, gender identity or expression, genetic information, or on the basis of these perceived characteristics, or based on association with a person or group with one or more of these actual or perceived characteristics. The District will strive to achieve a workforce that is welcoming to all genders, persons with disabilities and individuals from all ethnic and other groups to ensure the District provides an inclusive educational and employment environment. The Board also has adopted Board Policy 3410, Non-Discrimination, which prohibits unlawful discrimination in the workplace and in all programs and activities of the District. In addition, Board Policy 1200 defines the Mission of the District which also aligns with these principles.

## **Plan Component 4: Delegation of Responsibility, Authority and Compliance CCR, Title 5, §53003(c)(1) and §53020**

It is the goal of the Mendocino-Lake Community College District that all employees promote and support equal employment opportunity because such a goal requires a commitment and a contribution from every segment of the District. The general responsibilities for the prompt and effective implementation of this Plan are set forth below.

1. Board of Trustees

The MLCCD Board of Trustees is ultimately responsible for proper implementation of the District's Plan at all levels of District's operation, and for ensuring equal employment opportunity as described in the Plan. The MLCCD Board of Trustees assumes overall responsibility for the success of the District's effort to achieve Equal Employment Opportunity and provides a supportive environment free of cultural bias for all staff and students.

2. Superintendent/President

The Board of Trustees delegates to the Superintendent/President the responsibility for ongoing implementation of the Plan and for providing leadership in supporting the District's equal employment opportunity policies and procedures. The Superintendent/President shall advise the Board of Trustees concerning statewide policy emanating from the Board of Governors of the California Community Colleges and direct the publication of an annual report on Plan implementation. The Superintendent/President shall evaluate the performance of all administrators who report directly to him/her on their ability to follow and implement the Plan.

3. Equal Employment Opportunity Officer

The Director of Human Resources is designated as the Equal Employment Opportunity (EEO) Officer responsible for the day-to-day implementation of the Plan. The EEO Officer shall monitor compliance with the requirements of Title 5, Sections 53003-53034. The EEO Officer is also responsible for receiving complaints per Title 5, Section 53026, and ensuring that employment practices are properly monitored. The District shall make a continuous good faith effort to comply with all requirements of the Plan.

4. Equal Employment Opportunity Advisory Committee

The District has established an Equal Employment Opportunity Advisory Committee to act as an advisory body to the District Equal Employment Opportunity Officer and the District as a whole to promote understanding and support of equal employment opportunity policies and procedures. The Equal Employment Opportunity Advisory Committee assists in the development and implementation of the Plan in compliance with state and federal regulations and guidelines, monitors equal employment opportunity progress, and provides suggestions for Plan revisions as appropriate.

5. Screening Committees

A screening committee member, or any organization or individual, whether or not an employee of the District, who acts on behalf of the Board of Trustees with regard to the recruitment and screening of personnel is subject to the requirements of the District's EEO Plan and applicable Title 5 provisions.

6. Agents of the District

Any organization or individual, whether or not an employee of the District, who acts on behalf of the governing board with regard to the recruitment and screening of personnel, is an agent of the District and is subject to all the requirements of this Plan.

7. Good Fair Effort

The district shall make a continuous good faith effort to comply with all the requirements of the EEO plan.



**Plan Component 5: Equal Employment Opportunity Advisory Committee  
CCR, Title 5, §53005**

The District has established an Equal Employment Opportunity Advisory Committee to assist the District in implementing its Plan and to advise the District on personnel matters relating to equal employment opportunities. The Equal Employment Opportunity Advisory Committee will review Staff Availability Data and other relevant data for the purpose of advising the District and assisting in its commitment and goals in achieving equal employment opportunities.

The EEO Office shall train the EEO Advisory Committee on equal employment compliance and the Plan itself. The advisory committee shall receive training in all of the following:

- a. The requirements of subchapter 53003 and of state and federal nondiscrimination laws;
- b. Identification and elimination of bias in hiring;
- c. The educational benefits of workforce diversity; and
- d. The role of the advisory committee in carrying out the District's EEO Plan.

Composition of the Equal Employment Opportunity Advisory Committee shall include the Vice President of Administrative Services, Vice President of Academic Affairs, Vice President of Student Services, Academic Senate President, Classified Senate President, Management/Supervisory/Confidential President or their designees, and one other representative from each of the employee groups. In addition, the Student Equity, Success and Support Program Coordinator will participate on this committee so that EEO efforts will complement the Student Equity Plan.

The committee may sponsor events, training, or other activities that promote equal employment opportunity, nondiscrimination, retention and diversity. The Committee shall meet at least once every fiscal year, with additional meetings if needed to review EEO and diversity efforts, programs, policies, and progress. The committee will review the EEO Plan at least once every three (3) years, and any revised plan will be submitted to the Chancellor's Office.

**Plan Component 6: Complaints**  
**CCR, Title 5, § 53003(c)(2), 53026, and 59300 et seq.**  
**[See also MCLCCD Board Policy 706.1]**

The District has established the following process which permits any person to file a complaint alleging that the requirements of the equal employment opportunity regulations (California Code of Regulations, Title 5, Sections 53000 et seq.) have been violated.

1. Any person who believes that the equal employment opportunity regulations have been violated may file a written complain describing in detail the alleged violation.
2. All complaints shall be signed and dated by the complainant and shall contain, to the best of the complainant's ability, the names of the individuals involved, the date(s) of the event(s) at issue, and a detailed description of the actions constituting the alleged violation.
3. Complaints involving current hiring processes must be filed as soon as possible after the occurrence of an alleged violation and no later than thirty (30) days after such occurrence unless the complainant can verify a compelling reason for the district to waive the thirty (30) day limitation.
4. Complaints alleging violations of the EEO Plan that do not involve current hiring processes must be filed as soon as possible after the occurrence of an alleged violation and not later than sixty (60) days after such occurrence unless the violation is ongoing.
5. A copy of the complaint shall immediately be forwarded to the Chancellor's Office which may require the District to provide a written investigative report within ninety (90) days.

The decision of the District in complaints pursuant to Title 5, Section 53026, is final.

The District may return without action any complaints that are inadequate because they do not state a clear violation of the EEO regulations. All returned complaints must include a District statement of the reason for returning the complaint without action.

The complaint shall be filed with the EEO Officer. If the complaint involves the EEO Officer, the complaint may be filed with the Superintendent/President.

A written determination on all accepted written complaints will be issued to the complainant within ninety (90) days of the filing of the complaint. The District may extend the determination date in the interest of the investigation upon written notice to the complainant.

In the event that a complaint filed under Title 5, Section 53026, alleges unlawful discrimination, it will be processed according to the requirements of Title 5, Section 59300 et seq.

Alleging Unlawful Discrimination or Harassment (Title 5, Section 59300 et seq.)

The District has adopted procedures for complaints alleging unlawful discrimination or harassment (see Board Policy 307 and Administrative Procedure 307.1). The Director of Human Resources is responsible for receiving such complaints and for coordinating their investigation in accordance with established procedures.

**Plan Component 7: Notification to District Employees  
CCR, Title 5, §53003(c)(3)**

The commitment of the Board of Trustees and Superintendent/President to equal opportunity employment is emphasized through the broad dissemination of this Plan which is available to all District employees on the District portal. The EEO plan will be widely distributed electronically on an annual basis.

Policy statements prohibiting discrimination in all programs and services of the District are included in the college catalog and schedule of classes.

Upon employment, new employees will be provided with a copy of the District's Non-Discrimination policy and this Plan. Also, an annual notice to employees will emphasize the importance of employee participation and responsibility in ensuring implementation of the EEO Plan.

Every three years the EEO Advisory Committee will update and revise the EEO Plan. The suggested revisions will be reviewed through President's Policy Advisory Committee processes including distribution to constituent groups for input. Final approval of the Plan will be made by the Board of Trustees.

**Plan Component 8: Training for Screening Committees  
CCR, Title 5, §53003(c)(4) and 53020(c)**

Any organization or individual, whether or not an employee of the District, who is involved in the recruitment and screening of personnel shall receive appropriate training on the requirements of the title 5 regulations on equal employment opportunity (section 53000 et. Seq.); the requirements of federal and state nondiscrimination laws; the requirements of the District's Equal Employment Opportunity Plan; the District's policies on nondiscrimination, recruitment, and hiring; principles of diversity and cultural proficiency; the value of a diverse workforce; recognizing bias; and best practices in serving on a selection committee.

A person serving on a screening committee must have either completed training or served on a prior screening committee within one year of their current service but in no event will a person serve on a screening committee who has not received training within the last 24 months. This training is mandatory; individuals who have not received this training will not be allowed to serve on screening committees.

The District Equal Employment Opportunity Officer is responsible for providing the required training. Any individual, whether or not an employee of the District, who acts on behalf of the District with regard to recruitment and screening of applicants for employment, is subject to the equal employment opportunity requirements of Title 5 and the District's Equal Employment Opportunity Plan.

**Plan Component 9: Annual Written Notice to Community Organizations  
CCR, Title 5, 53003(c)(5)**

Human Resources will provide annual written notice to appropriate community-based and professional organizations concerning the EEO Plan, and shall solicit their assistance in identifying qualified candidates from diverse backgrounds. The notice will include a summary of the Plan. The notice will also include the Internet address where the District advertises its job openings and the names, departments and phone numbers of individuals to call in order to obtain employment information. The District will actively seek to reach those institutions, organizations, and agencies that may be recruitment sources. A list of organizations, which will receive this notice, is attached to this Plan in Appendix A. This list may be revised from time to time as necessary.

**Plan Component 10: Analysis of District Workforce and Applicant Pools  
CCR, Title 5, §53003(c)(6)**

The Human Resources department will annually collect the District's employee demographic data and shall monitor applicants for employment on an ongoing basis in order to evaluate the District's progress in implementing the Plan and to provide data needed for the reports required by this Plan. Monitored groups are men, women, American Indians/Alaskan Natives, Asians or Pacific Islanders, Blacks/African-Americans, Hispanics/Latinos, Caucasians, and persons with disabilities.

For purposes of the data collection and report each applicant or employee will be afforded the opportunity to voluntarily identify their gender, ethnic group identification and, if applicable, their disability. Persons may designate as many ethnicities as they identify with, but shall be counted in only one ethnic group for reporting purposes. This information will be kept confidential and will be separated from the applications that are forwarded to the screening committee and hiring administrator(s). The District will annually report to the Chancellor the results of its annual data collection. At least every three years the Plan will be reviewed and, if necessary, revised based on an analysis of the ethnic group identification, gender, and disability composition of existing staff and of those who have applied for employment in each of the following identified job categories:

- Executive/Administrative/Managerial
- Faculty and Other Instructional Staff (full-time and part-time)
- Professional Non-Faculty
- Secretarial/Clerical
- Technical and Paraprofessional
- Skilled Crafts
- Service and Maintenance

District Workforce Analysis  
EEO Data Collection Monitored Group Definitions:

GENDER IDENTIFICATION: The District requested employees to self-identify as female, male, or non-binary.

RACE AND ETHNICITY IDENTIFICATION: The District requested that employee's self-identify into the following ethnicity categories:

1. Hispanic or Latino – A person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin regardless of race.
2. White Caucasian (Not Hispanic or Latino) – A person having origins in any of the original people of Europe, the Middle East, or North Africa.
3. Black African American (Not Hispanic or Latino) – A person having origins in any of the black racial groups of Africa.

4. Asian or Other Pacific Islander (Not Hispanic or Latino) – Persons having origins in any of the original peoples of the Far East, Southeast Asian, the Indian subcontinent, or the Pacific Islands. This category includes, for example, persons of Chinese, Japanese, Filipino, Korean, Vietnamese, Asian Indian, Hawaiian, Guamanian, Samoan, Laotian, and Cambodian decent.
5. American Indian or Alaska Native (Not Hispanic or Latino) – A person having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.

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

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

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

“Major life activities” means functions such as caring for one’s self, performing manual tasks, walking, seeing, hearing, talking, breathing, learning, and working.

EEO Data Collection Monitored Group Identification Issue:

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

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

**Plan Component 11: Analysis of Degree of Under Representation and Significant Underrepresentation**  
**CCR, Title 5, §53003(c)(7)**

In the event that the State Chancellor provides new availability data regarding job applicants, districts must analyze the degree to which monitored groups are underrepresented in comparison to their representation in the field or job category in which they are applying. The District EEO Office shall be responsible for developing procedures to implement this requirement if and when availability data becomes available.

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



**Plan Component 12: Methods to Address Underrepresentation  
CCR, Title 5, §§53003(c)(8) and 53003(c)(9)**

Underrepresentation based on availability data

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

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

The District will review the information gathered pursuant to Plan Component 10, to determine if significant underrepresentation of a monitored group may be the result of non-job-related factors in the employment process. For the purposes of Plan Component 13, the phases of the employment process include, but are not limited to, recruitment, hiring, retention and promotion. The information to be reviewed shall include, but need not be limited to:

1. Longitudinal analysis of data regarding job applicants, gathered pursuant to Plan Component 10, to identify whether over multiple job searches, a monitored group is disproportionately failing to move from the initial applicant pool, to the qualified applicant pool;
2. Analysis of data regarding potential job applicants, to the extent provided by the State Chancellor, which may indicate significant underrepresentation of a monitored group; and
3. Analysis pursuant to section 53003(c)(7) to determine whether the group is significantly underrepresented.

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

1. Review its recruitment procedures and identify and implement any additional measures which might reasonably be expected to attract candidates from the significantly underrepresented group;
2. Consider various other means of reducing the significant underrepresentation which do not involve taking monitored group status into account, and implement any such techniques which are determined to be feasible and potentially effective;

3. Determine whether the group is still significantly underrepresented in the category or categories in question after the measures described in (1) and (2) have been in place a reasonable period of time; and
4. Review each locally established “required,” “desired” or “preferred” qualification being used to screen applicants for positions in the job category to determine if it is job-related and consistent with:
  - a. Any requirements of federal law; and
  - b. Qualifications which the Board of Governors has found to be job-related throughout the community college system, including the requirement that applicants for academic and administrative positions demonstrate sensitivity to the diversity of community college students; or
5. Discontinue the use of any locally established qualification that has not been found to satisfy the requirements set forth in paragraph (4) of this subdivision;
6. Continue using qualification standards meeting the requirements of paragraph (4) of this subdivision only where no alternative qualification standard is reasonably available which would select for the same characteristics, meet the requirements of paragraph (4) and be expected to have a less exclusionary effect; and
7. Consider the implementation of additional measures designed to promote diversity that are reasonably calculated to address the area of specific need.

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

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

1. Having the Equal Employment Opportunity Advisory Committee, in conjunction with appropriate human resources staff, review the district’s recruitment procedures and make recommendations on modifications that would address the underrepresentation.
2. Increasing the advertising and recruitment budget for a three-year period to ensure that recruitment is broad and inclusive.
3. Requiring that the responsible administrator for the department where the significant underrepresentation occurs develop, in conjunction with the Director of Human Resources a

recruitment and hiring action plan to assist in addressing the significant underrepresentation. The action plan will include, but is not limited to:

- a. Additional locations or resources to advertise positions that would likely attract candidates from the significantly underrepresented groups;
  - b. Promotion of curricular offerings that would assist in attracting candidates from significantly underrepresented groups;
  - c. Additional training for current faculty and staff on the value of a diverse workforce;
  - d. Recommended changes to the job announcement and screening criteria, including interview questions, which may reasonably be expected to attract candidates from the significantly underrepresented group.
4. Focusing attention on intern programs where graduate students will be provided the opportunity to co-teach a class offered by the district in the significantly underrepresented discipline.
5. Actively monitoring the representation rate of each group, which was identified as being significantly underrepresented in one or more categories. If significant underrepresentation persists for a particular group in the job category in question, after the measures described above have been in place for a period of at least three years, the district will:
- a. Review each locally established “required”, “desired”, or “preferred” qualification being used to screen applicants for positions in the job category to determine if it is job-related and consistent with business necessity through a process meeting the requirements of federal law.
  - b. Discontinue the use of any locally established qualification that is not found to satisfy the requirements set forth in the previous paragraph and continue using qualification standards meeting the requirements in the previous paragraph only where no alternative qualification standard is reasonably available which would select for the same characteristics, meet the requirements of the previous paragraph, and be expected to have a less exclusionary effect.
  - c. Analyze the feasibility of significantly increasing the recruitment budget for another three years.
  - d. Develop a recruitment committee composed of the President, Director of Human Resources, the dean or responsible administrator for the department where the significant underrepresentation persists and members of the Equal Employment Opportunity Advisory Committee to review the effectiveness of the recruitment and hiring program described in *section 3* above. The committee will provide recommendations to modify the recruitment and hiring program to better address the significant underrepresentation.

**Plan Component 13: Process for Developing and Implementing Strategies that Promote Diversity**  
**CCR, Title 5, §§53003(c)(9) and 53024**

The District is responsible for developing and implementing strategies designed to promote the diversity of its workforce at all levels and demonstrate the District's institutional commitment to diversity. This process shall include the components noted below.

The District recognizes that multiple approaches are appropriate to fulfill its mission of ensuring equal employment opportunity, the development of a diverse workforce, and the creation of an inclusive, equitable and fair working and learning environment. The District shall take vigorous steps to promote, on an on-going basis, equal opportunity, workplace diversity and an inclusive work environment. The District shall also take specific steps to monitor its progress in these areas.

The Director of Human Resources shall ensure the specific steps that will be utilized by the District are identified and updated on a regular basis. These vigorous steps may include any of the examples listed below, or other measures as identified and developed by the Equal Employment Opportunity Advisory Committee in close consultation with the Director of Human Resources. In identifying and implementing particular strategies, the Director of Human Resources will:

1. Work closely with the Advisory Committee, as noted above.
2. On an annual basis identify steps that shall be taken.
3. Select strategies that, over time, will produce comparative longitudinal information.
4. Operate collaboratively and transparently with all stakeholders.

Component 1: Recruitment and Hiring Strategies

It is the policy of the district to aggressively pursue a program of verifiable recruitment that is inclusive and open to all individuals. Efforts will be undertaken on a regular basis to develop and contact new recruitment sources that ensure diverse pools of candidates. Diverse pools should include, but not be limited to, men, women, persons with disabilities, and individuals from all ethnic and other groups protected from discrimination. The Equal Employment Opportunity Advisory Committee is encouraged to utilize and notify the district of additional recruitment options that may enable the district to obtain a diverse pool of applicants.

The district will include in the recruitment section of its recruitment and hiring procedures the following provisions:

- Recruitment for all open positions shall include, but not be limited to, placement of job announcements in electronic, aggregate job boards recommended by the Equal Employment Advisory;

- Social media sites associated with affinity groups;
- Local and regional community newspapers;
- Electronic aggregate job boards that provide information in languages other than English and to low-income communities;
- Electronic aggregate job boards whose primary audience is comprised of groups found to be underrepresented in the district's workforce
- Recruitment booths at job fairs or conferences oriented to both the general market and the economically disadvantaged as well as those events drawing significant participation by groups found to be underrepresented in the district's workforce;

The district's recruitment and hiring procedures section on "Job Announcements" will be revised to include the following provisions:

- Job announcements will state clearly job specifications setting forth the knowledge, skills, and abilities necessary to job performance. For all positions, job requirements will include demonstrated sensitivity to and understanding of the diverse academic, socioeconomic, cultural, disability, and ethnic backgrounds of community college students.
- Job specifications, including any "required," "desired," or "preferred" qualifications beyond the state minimum qualifications which the district wishes to utilize, will be reviewed by the Director of Human Resources before the position is announced, to ensure conformity with equal employment regulations and state and federal nondiscrimination laws.
- The District's applicant software and Human Resources Homepage shall state that the district is an "Equal Opportunity Employer."

### Component 2: Additional Strategies

Examples of additional strategies that may be utilized by the District to promote diversity include:

- Conduct diversity dialogues, forums, and cross-cultural workshops;
- Involve guest speakers from underrepresented groups who are in leadership positions and who may engage both students and employees;
- Highlight the District's equal employment opportunity and diversity policies in job announcements and in its recruitment, marketing, and other publications. Include in job announcements language indicating that candidates are required to demonstrate that they can infuse diversity into their major job duties;
- Conduct campus climate studies to identify areas for attention;

- Review and revise college/District publications and other marketing tools to reflect diversity in pictures, graphics, and text to project an inclusive image;
- Offer a series of Equal employment Opportunity/diversity workshops for faculty and staff;
- Evaluate administrators yearly on their ability and efforts to meet the District's equal employment opportunity and diversity efforts;
- Maintain an Equal Employment Opportunity online presence on the District's website by highlighting the District's diversity and equal employment opportunity, ADA, sexual harassment and nondiscrimination policies, procedures and programs on the District's website. The website will also list contact persons for further information on all of these topics.
- Promote various cultural celebrations on campus;
- Recognize multilingualism and knowledge of multiculturalism as a desired, and when appropriate, required skill and qualification for community college employees;
- Promote leadership opportunities, such as a Latina Leadership Network and APAHE (Asian Pacific Americans in Higher Education) for staff, faculty and students;
- Seek direct contact with student, professional, community and other organizations that represent the diverse community we serve. These organizations can serve as resources for referring potential candidates;
- Conduct exit interviews with employees who voluntary leave the district, maintain a data base of exit interviews, analyze the data for patterns impacting particular monitored groups, and implement concrete measures that utilize this information;
- Maintain a variety of programs to support newly-hired employees such as mentoring, professional development, and leadership opportunities;
- Audit and update job descriptions and/or job announcements;
- Ensure the timely and thorough investigation of all harassment and discrimination complaints.

**Plan Component 14: Persons with Disabilities**  
**CCR, Title 5, §53025**

Applicants and employees with disabilities shall receive reasonable accommodations consistent with the requirements of Government Code, sections 11135 et seq. and 12940(m); section 504 of the Rehabilitation Act of 1973; and the Americans with Disabilities Act. Such accommodations may include, but are not limited to, job site modifications, job restructuring, part-time work schedules, flexible scheduling, reassignment to a reasonably equivalent vacant position, adaptive equipment, and auxiliary aides such as readers, interpreters, and note takers.

**Plan Component 15: Graduate Assumption Program of Loans for Education  
Education Code §§87106 and 69618 et seq.**

The District will encourage community college students to become qualified for and seek employment as higher education employees. The District will also consider strategies to inform students about the opportunity to participate in the Graduate Assumption of Loans Program for Education when the program is funded and available.

The District will inform graduate students in local colleges and universities about the benefits of employment in higher education through participation in area job fairs and similar employee recruitment events.



**APPENDIX A**

**Organizations for Annual Written Notice Per Plan Component 9**

American Association of University Women (AAUW)	CA Hispanic Chamber of Commerce Northern Region
CCC Registry	North Bay Black Chamber of Commerce
Mendocino County Health & Human Services Agency	Latina Leadership Network
Adventist Health	Cahto Tribe
Mendocino Coast District Hospital	Coyote Valley Band of Pomo Indians
Mendocino County Health & Human Services Agency	Guidville Indian Rancheria
Ukiah Chamber of Commerce	Hopland Bank of Pomo Indians
Anderson Valley Chamber of Commerce	Manchester Band of Pomo Indians
Fort Bragg/Mendocino Coast Chamber of Commerce	Pinoleville Pomo Nation
Redwood Coast Chamber of Commerce	Potter Valley Tribe
Round Valley Chamber of Commerce	Redwood Valley or Little River Band of Pomo Indians of the Redwood Valley Rancheria
Willits Chamber of Commerce	Round Valley Reservation
City of Ukiah	Sherwood Valley Rancheria
City of Fort Bragg	Big Valley Band Rancheria
City of Willits	Elem Indian Colony
Mendocino County	Habematolel Pomo of Upper Lake
Sonoma County	Middletown Rancheria of Pomo Indians
Lake County	Robinson Rancheria
Mendocino County Office of Education	Scotts Valley Reservation
Anderson Valley Unified School District	PFLAG – Ukiah Parents, Families and Friends of Lesbians and Gays
Fort Bragg Unified School District	
Leggett Valley Unified School District	
Arena Union Elementary School District	
Laytonville Unified School District	
Manchester Union Elementary School District	
Mendocino Unified School District	
Potter Valley Community Unified School District	
Ukiah Unified School District	
Point Arena Joint Union High School District	
Round Valley Unified School District	
Willits Unified School District	

**APPENDIX B  
HISTORICAL DEMOGRAPHIC DATA**

**Workforce Analysis  
Fall 2018**

Category	Current Workforce	American Indian/Alaskan Native	Asian/Pacific Islander	Black/African American	Hispanic/Latino	Two or more Race	Unknown	White	Male	Female
Executive/Admin/Managerial	29	0			9	0	2	18	11	18
Full-time Faculty	69	1	4		10	4	0	50	35	34
Part-time Faculty	214	6	15	1	16	7	4	165	89	125
Secretarial/Clerical	39	3			8		2	26	2	37
Technical/Paraprofessional	14		1		2			11	11	3
Skilled Crafts	1				1				1	
Service/Maintenance	87	2	2		36		13	34	39	48
<b>Total</b>	<b>453</b>	<b>12</b>	<b>22</b>	<b>1</b>	<b>82</b>	<b>11</b>	<b>21</b>	<b>304</b>	<b>188</b>	<b>265</b>

Employees with Disabilities: Unknown

In comparison to the previous year, this data is higher based on inclusion of STNC positions (allocated to the service/maintenance category), where as they were previously excluded.

This work force analysis includes all employees employed during the month of October 2018.

Data is reflective of EEO-1 Reporting submitted for Federal Reporting.

**Applicant Pool Analysis  
(2015-16, 2016-17, 2017-18)**

Category	Total Applicants	American Indian/Alaskan Native	Asian/Pacific Islander	Black/African American	Hispanic / Latino	White	Ethnicity Undisclosed	Male	Female	Gender Undisclosed
Executive/Admin/Managerial	185	4.5	10.5	10	31.5	114.5	14	28	13	11
Full-time Faculty	267	3.5	19	15	45	159.5	25	126	91	3
Part-time Faculty	77	1.5	3	3	9.5	55	5	14	4	4
Secretarial/Clerical	146	7.5	6	0	31.5	87	14	11	55	0
Technical/Paraprofessional	32	0	3	0	4	21	4	23	0	0
Skilled Crafts	8	0	0	0	0	8	0	5	0	0
Service/Maintenance	32	2	0	1	6	21	2	12	0	0
<b>Total</b>	<b>747</b>	<b>19</b>	<b>41.5</b>	<b>29</b>	<b>127.5</b>	<b>466</b>	<b>64</b>	<b>219</b>	<b>163</b>	<b>18</b>

Data is based on submitted voluntary EEO Applicant Surveys, collected and maintained for the three year period defined above. This data does not capture any short term, non-continuing applicants (STNCS).