



College Place Public School District No. 250 Affirmative Action Plan 2007-2012

Superintendent:

Mr. Tim Payne, Board Secretary



Board of Directors:

Mr. Paul Hartwig, Chairman - District #1

Mrs. Julie Hill, Vice Chair - District #4

Mr. John Davin, District #2

Mr. Bob Giger, District #3

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I. INTRODUCTION

School Districts in the state of Washington are required by WAC 392-200-005 to establish and implement affirmative action programs that are designed to . . . "eliminate discrimination on the basis of sex, race, creed, color, national origin, marital status, age, or for presence of any sensory, mental, or physical handicap."

The College Place Public School District No. 250 has established a firm commitment to providing equal employment opportunity to all applicants and staff in all aspects of employment, including recruitment, hiring, retention, assignment, transfer, promotion, and training. The District's nondiscrimination and Affirmative Action Policy is set forth in Appendix A. The following Affirmative Action Plan will outline steps to be taken to ensure that the College Place Public School District's policies and practices do not unlawfully discriminate against an individual on the basis of race, color, creed, religion, age, sex, ethnicity, national origin, veteran status, marital status, or the presence of a sensory, mental or physical disability. Furthermore, reasonable steps will be taken to actively promote employment opportunities to qualified individuals in protected groups that are underutilized in the workforce.

The Equal Employment Opportunity Policy presented here is designed for the years 2007-2012. Although this plan covers a five-year period, it is essential that it be reviewed regularly and modified, if necessary; in accordance with applicable law. The basis for analysis in the current plan involves a comparison of the District's minority staff in various job categories to the percentage of minorities in the available labor force. Similarly, the basis for the analysis relative to gender balance in this plan is the proportion of men to women in the available labor force for various job categories. Additionally, the District's commitment to avoidance of discrimination in the hiring and promotion of disabled persons, disabled veterans, Vietnam-era veterans, and persons over age forty is reaffirmed. The purpose of these Affirmative Action commitments remains the same as that of earlier plans, to ensure the absence of discrimination in employment practices. The Affirmative Action Plan presented in this document represents the College Place Public School District's commitment to Equal Employment Opportunity. Each employee of the District who is involved in a hiring or promotion recommendation must be committed to ensuring that the recommendation is made without discrimination. It is the responsibility of each employee to promote a strong commitment to Equal Employment Opportunity at his/her work site and throughout the District.

The Affirmative Action Officer known as the Superintendent of the District is assigned responsibility for implementing and reporting to the School Board of Directors, as part of its standard reporting procedures, progress in the implementation of the District's Affirmative Action Plan. Copies of the Affirmative Action Plan will be made available to the School Board of Directors, the Washington State Human Rights Commission, the Office of Superintendent of Public Instruction, the State Department of Personnel, Administrators, all school and/or building locations, all staff members, the President of all Employee Associations, community groups, and other interested parties upon request.

II. PURPOSE

It is the purpose of this Affirmative Action Plan of the College Place Public Schools District to promote, monitor and maintain the District's Affirmative Action and Equal Employment Opportunity policies. These policies provide for Equal Employment Opportunities for all employees and applicants for employment without unlawful discrimination on the basis of race, color, creed, religion, age, sex, ethnicity, national origin, veteran status, marital status, or the presence of a sensory, mental or physical disability, and promote diversity in the District's workforce.

It is also the purpose of this Plan to identify at all levels of the workforce, areas of underutilization of protected groups and to identify and address, when possible, the factors that may be causing such underutilization. This Plan is designed to promote outreach, recruitment, training and education efforts intended to expand the pool of qualified applicants to promote diversity, consistent with the District's standards of excellence.

This Plan advances Equal Employment Opportunity without preferential treatment on the basis of race, gender, ethnicity or national origin. This Plan is also designed to ensure that District policies are properly implemented without unlawful discrimination on the basis of race, color, creed, religion, age, gender, national origin, ethnicity, veteran status, marital status, or the presence of a sensory, mental or physical disability

In summary, it is the purpose of the College Place Public School District's Affirmative Action Plan to ensure Equal Employment Opportunity for all applicants and personnel:

- A.** To ensure the absence of discrimination in employment practices because of: race; color; religion; sex; age; national origin; marital status; creed; the presence of sensory, mental, or physical disabilities; disabled veteran status; or Vietnam-era veteran status.
- B.** To identify at all levels of the District's work force areas of underutilization of minorities and women.
- C.** To recognize identified underutilization when planning and implementing recruitment efforts.

III. RESPONSIBILITY FOR IMPLEMENTATION, AUDITING, MONITORING, AND MAINTENENCE OF THE PLAN

The Human Resources Department will maintain such records as to comply with local, State, and Federal requirements pertaining to employment. The Human Resources Department will maintain a record system that will collect facts on District employees' and applicants' sex, minority status, etc. to help ensure that the District's recruiting efforts are reaching protected groups.

The Affirmative Action Officer will evaluate the effectiveness of the plan, prepare an annual report on the effectiveness of the plan, and recommend changes to the Board of Directors through the Superintendent. The annual report and recommendations will be submitted to the Board of Directors. Changes mandated by the Board will be carried out under the direction of the Affirmative Action Officer:

A. The Superintendent has the overall responsibility for the development, implementation, coordination, and monitoring of the Affirmative Action Plan and is responsible for ensuring that administrators and supervisors are fully aware of their role in supporting the Plan.. The Superintendent shall act in the role of Affirmative Action Officer, here on referred to as the Superintendent.

B. The Superintendent is charged with the responsibility of making known the District's desire and commitment to employ members of protected as well as non-protected groups through regular and frequent contact with community groups and employment agencies and through identifying, to the extent possible, persons with requisite skills and talents for projected openings throughout the District. The Superintendent shall ensure that recruitment efforts are reaching protected groups as well as unprotected groups in all categories where underutilization exists.

C. The Superintendent will advise the Board on Equal Opportunity matters as required. The Superintendent will monitor and evaluate the Plan's accomplishments and will prepare memoranda addressing proposed action and other issues as required by this Plan.

D. The Superintendent can be reached at (509) 525-4827 or by writing to: Affirmative Action Officer, College Place School District, 107 SE 2nd St., College Place, WA 99324.

In summary, the Superintendent will conduct an annual review of the District's progress toward the goals set forth in this Plan and report the results of this review to all District administrators and to the School Board of Directors.

IV. DISSEMINATION OF PLAN AND POLICIES

It is the responsibility of the Superintendent of the College Place Public School District or the Superintendent's designee to inform all applicants for employment, all current employees, all persons responsible for hiring within the District, all employee associations, and all District contractors and subcontractors of the District's commitment to Equal Employment Opportunity.

Communication of the District's Affirmative Action Plan will be accomplished as follows:

A. Internal and External Communication

College Place Public School District's Affirmative Action Plan will be accomplished as follows:

1. Copies of the 2007-2012 Affirmative Action Plan will be available upon request to all pertinent organizations, agencies and individuals inside and outside the College Place Public School District as follows:

- School Board of Directors
- All Administrators (Certified and Classified)
- All Schools and/or Building Locations
- The President of all Employee Associations
- Any Employee, upon request
- The Office of State Superintendent of Public Instruction
- The Washington State Human Rights Commission
- The State Department of Personnel

2. A statement of the District's Equal Employment Opportunity Policy will be placed in pertinent District recruitment material, application forms, and newspaper advertisements.

3. All District recruiting sources will be informed annually regarding the District's Nondiscrimination Policy and its' Affirmative Action Plan.

4. Upon adoption of the District's 2007-2012 Affirmative Action Plan, the Superintendent will issue a statement and information concerning the Affirmative Action Plan in regular District publications.

5. Announcements of training opportunities that promote the goals of the Plan will be issued to staff through shared notices and/or email.

6. All District contractors, vendors and suppliers will be notified that they must comply with the District's equal employment opportunity policy and this Plan.

7. The name, address, and telephone number of the District's Affirmative Action Officer, known as Superintendent, will be published, at least annually, in regular District publications to staff and the community. The Superintendent contact information is identified in *Appendix B on page 37* of this document.

8. All District job postings and newspaper advertisements will include an Equal Employment Opportunity statement.

9. Upon employment, each new employee will be informed of the District's Affirmative Action Plan and policies against discrimination.

10. Administrators shall, at least annually, inform all staff of the District's Affirmative Action Plan.

11. All employees are responsible for the success of the District's Affirmative Action Plan.

V. INTERNAL AUDIT AND REPORTING

The District's Human Resources Department will maintain a confidential employee and applicant tracking system—separate from the pre-employment application process— which records the sex, race, ethnicity, age and disability and veteran status of applicants (*Refer to Appendix C on page 38*). Frequent monitoring of this data will help ensure that all applicants are receiving equal treatment in the hiring process and that the District's recruiting efforts are reaching all protected and non protected groups. The pre-employment application forms used for both certificated and classified personnel, however, will exclude inquiries that unnecessarily elicit the race, gender or membership of the applicant in other protected groups.

Annual reviews of the District's progress toward the goals set in this plan will be conducted by the District's Superintendent and reported to all District Administrators and to the School Board of Directors.

The analysis will include:

- 1. Applicant Data**
- 2. Interview and Hiring Data**
- 3. Transfer and Promotion Data**
- 4. Termination Data**

VI. SUPPORTIVE SYSTEMS

A. Recruitment & Employment Plan of Employees

The College Place Public School District shall ensure that all applicants and employees are considered on the basis of job-related qualifications as needed on the basis of merit, training, and experience. The District shall select without preferential treatment and with no unlawful discrimination against any employee or applicant because of race, color, creed, religion, age, sex, ethnicity, national origin, veteran status, marital status, or the presence of a sensory, mental or physical disability. A continuing review of hiring criteria is made to ensure the relevance of the job qualifications to the tasks to be performed and the needs of the position.

The purpose of the Affirmative Action Plan is to include persons of an underutilized class into the employment process, not to exclude others from it. The District shall emphasize in all recruitment contacts that discrimination is prohibited in the District's recruitment process. In addition, the District promotes continued relationships with organizations that are a recruitment source for individuals from protected groups, including those groups that currently may be underutilized in the workforce. These organizations include such agencies as the state job service agencies and college and university placement offices.

Consistent with the District's Equal Employment Opportunity Policy, and in addition to other measures described in this Plan:

- 1.** Publicity for job openings may include, without limitation, informing professional groups and organizations that include both protected and non protected groups, visiting areas job fairs to promote a diverse population of qualified applicants, and listing job openings, including minimum qualifications on the District website.
- 2.** All staff will be encouraged to facilitate recruitment of a diverse pool of qualified applicants, including individuals from underrepresented protected groups.
- 3.** All subcontractors, vendors, and suppliers will be notified in writing of the District's Equal Employment Policy.
- 4.** All recruiting sources will be notified in writing of the District's Equal Employment Policy.

Job announcements are distributed via email to staff in the District and also on the District Website. Applicants are recruited from a variety of sources, including, but not limited to:

- Current Candidate Files
- Current Substitutes
- Newspaper Advertisements
- College Placement Offices
- Student Teachers
- Teachers.com On-Line Advertising
- Mailings to Teacher Training Institutions
- Job Fairs
- Teacher Career Fairs

- Conferences, Activities, Presentations, Receptions, etc.

A continuing review of hiring criteria for each open position will be conducted, and the relevancy of these criteria to the essential functions of the position will be analyzed.

Employee selection procedures and materials will be carefully reviewed to ensure they do not illegally discriminate against any candidate.

B. Career Counseling/Skill Training Programs

The Human Resources Department shall announce the career counseling services available to District staff. Upon request, the department will meet individually with employees in order to answer questions or concerns regarding career opportunities in the District and, when appropriate, make recommendations regarding additional training that would enhance the individual's opportunity for career advancement.

The District's staff development function shall be responsible for ensuring that each employee in the district receives the opportunity to participate in staff development classes and programs offered. The development of various training programs is an important part of establishing an effective system by which people might move from beginning levels to a District program of training and development. Opportunities will be provided through the staff development program for employees to receive such training.

C. Grievance Procedure

To ensure fairness and consistency, grievance procedures related to the District's Equal Employment Opportunity Policies have been established. (*Refer to Appendix A-1 on page 26.*) No individual's status with the District shall be adversely affected in any way because the individual has utilized these procedures in good faith.

VI. RESPONSIBILITY FOR IMPLEMENTATION

The Superintendent of the District has the overall responsibility for the development, implementation, coordination, and monitoring of the Affirmative Action Plan. The Superintendent has the authority to represent the District in the identification of problem areas and recommendations or directives for solving identified problems. Questions regarding Affirmative Action should be directed to this individual.

VII. REDUCTION IN FORCE

The District's Reduction in Force ("RIF") will be made in accordance with applicable law and procedures for bargaining unit positions established by collective bargaining agreements. Seniority within the appropriate job group is the principal factor determining retention. Affirmative Action is not currently a factor in negotiated RIF procedures. RIF procedures for administrative and other exempt positions are established by School Board Policy and do not explicitly address Affirmative Action. If a RIF is necessary, consistent with its legal and contractual obligations, the District will make reductions in force bearing in mind its commitment to Equal Employment Opportunity.

VIII. NUMERICAL ANALYSIS OF WORKFORCE

The analysis section of the College Place Public Schools Affirmative Action Plan publication reflects a numerical analysis of the College Place School District workforce demographics.

The following six tables contain a numerical study of the District's workforce. The term "underutilization" as used in this policy means having fewer members of an affected group in a particular job category than reasonably would be expected based upon their availability. The statistical comparisons in this section involve the use of workforce statistics for geographic areas relevant to College Place, WA derived from Public Census Reports.

Most of these reports are available on the Office of Superintendent of Public Instruction's website:

www.k12.wa.us/equity/AffirmativeAction/guidelines.aspx

The use of such geographic areas and statistics is intended only for the purpose of implementing this Plan and facilitating identification of areas of potential underutilization. These statistical comparisons do not have any independent legal or factual significance. The statistics and geographic areas have been selected and used in good faith with respect to this Plan.

Availability Study

To research and prepare information for the District's 2007-2012 Plan, an availability analysis was conducted based on state/county census reports and statistical population studies from various sources for the minority, female, disabled, veteran and aged workforce. The resources used for this data of the Washington State and Walla Walla County are based on Census 2000, Workforce Explorer, Employment Security and the Office of Financial Management.

IX. UTILIZATION ANALYSIS BY JOB CATEGORY

A. Marital Status, Age

This District's commitment in these areas is based on the reaffirmation of its practice of avoiding discrimination in all aspects of employment in regard to members of these groups. The District will review and, if necessary, revise its employment application forms to reduce the possibility of discrimination in these and other areas. The staff responsible for hiring in the District will be given information relative to the use of appropriate pre-employment inquiries. (*Refer to Table 1 page 16.*) The District will continue to ensure the absence of discrimination based on age or marital status.

Job categories for our small District do not appear to be underutilized for women or for persons over age 40.

Data on the number of employees in protected classes is based on self-identification at the time of employment or through periodic workplace surveys and may not be entirely accurate.

B. Persons with Disabilities

In compliance with Section 504 of the Vocational Rehabilitation Act of 1973 and the Americans with Disabilities Act of 1990, the District is committed to the avoidance of discrimination in hiring and promotion of persons with disabling conditions. The District is also committed to making reasonable accommodations to allow disabled employees the opportunity to be successful. The action of the District with respect to this group is to reaffirm its strong commitment to avoid illegal discrimination in all aspects of employment in regard to disabled individuals. As one demonstration of this commitment, the District will include on all vacancy announcements a statement encouraging persons with disabilities to apply.

Persons with disabilities may be underutilized in this group. The District relies on its Affirmative Action data collection process, which entails voluntary reporting, for these affirmative action numbers. Employees may be more reluctant to self-report disability status than other demographic information, as a matter of privacy. The District is nevertheless committed to its policy of nondiscrimination on the basis of disability.

C. Disabled Veterans & Vietnam-Era Veterans

The District's commitment for these groups involves the reaffirmation of its commitment to avoid discrimination in all aspects of employment with regard to disabled and Vietnam-era veterans. Although it seems clear that the number of individuals from these categories seeking entry-level positions is decreasing over time, the District maintains its commitment to avoid discrimination in employment practices related to this group. Staff responsible for hiring and promotion will be given information designed to sensitize them to the potential for discrimination in this area. This information will be reviewed in meetings with the management team as we begin implementation of the newly adopted plan. In addition, the District will include a statement in all its job vacancy announcements encouraging disabled and Vietnam-era veterans to apply.

Vietnam-era veterans and disabled veterans may be underutilized in our District. Given the passage of time, the District anticipates that the number of Vietnam-era veterans in the workforce has declined.

Nevertheless, the District remains committed to Equal Employment Opportunities for all veterans, including disabled veterans. These findings will be considered as the District plans and implements its future recruitment efforts to ensure that members of underutilized groups are reached by such efforts.

D. General Utilization Analysis for Ethnic and Gender Composition

This analysis summarizes the utilization for gender and ethnicity. *Table 2 and Table 3, on pages 17 - 18,* summarizes the ethnic and gender composition of the College Place Public Schools District staff as of January 1, 2007. This summary includes only regular full- and part-time employees; it does not include substitute and temporary employees.

The 4/5 or 80% rule is commonly used in Affirmative Action Plans to identify statistically significant underutilization. The use of such an adjustment avoids focusing on underutilization, which may be caused by random factors not related to actual utilization patterns. Significant underutilization is also identified in Table 3.

E. Salary Ranges

Table 4, on page 19, provides current general salary ranges for all job classifications.

TABLE 1
College Place Public Schools
Employees Over 40 Years of Age as of January 1, 2007

Table 1: College Place Public Schools Employees Over Forty This table shows the number of employees over the age of 40 compared to the general population of Walla Walla County over 40 years of age.

	<u>Total</u>	<u>Persons Over 40</u>	
	<u>Employees</u>	<u>Number</u>	<u>Percent</u>
Certificated Administrators	6	5	83%
Certificated Teachers	57	31	54%
Classified	55	50	91%
Walla Walla County General Population	57,900	23,631	41%

TABLE 2
College Place Public Schools
MALE / FEMALE REVIEW ANALYSIS
Staff Profile as of January 1, 2007

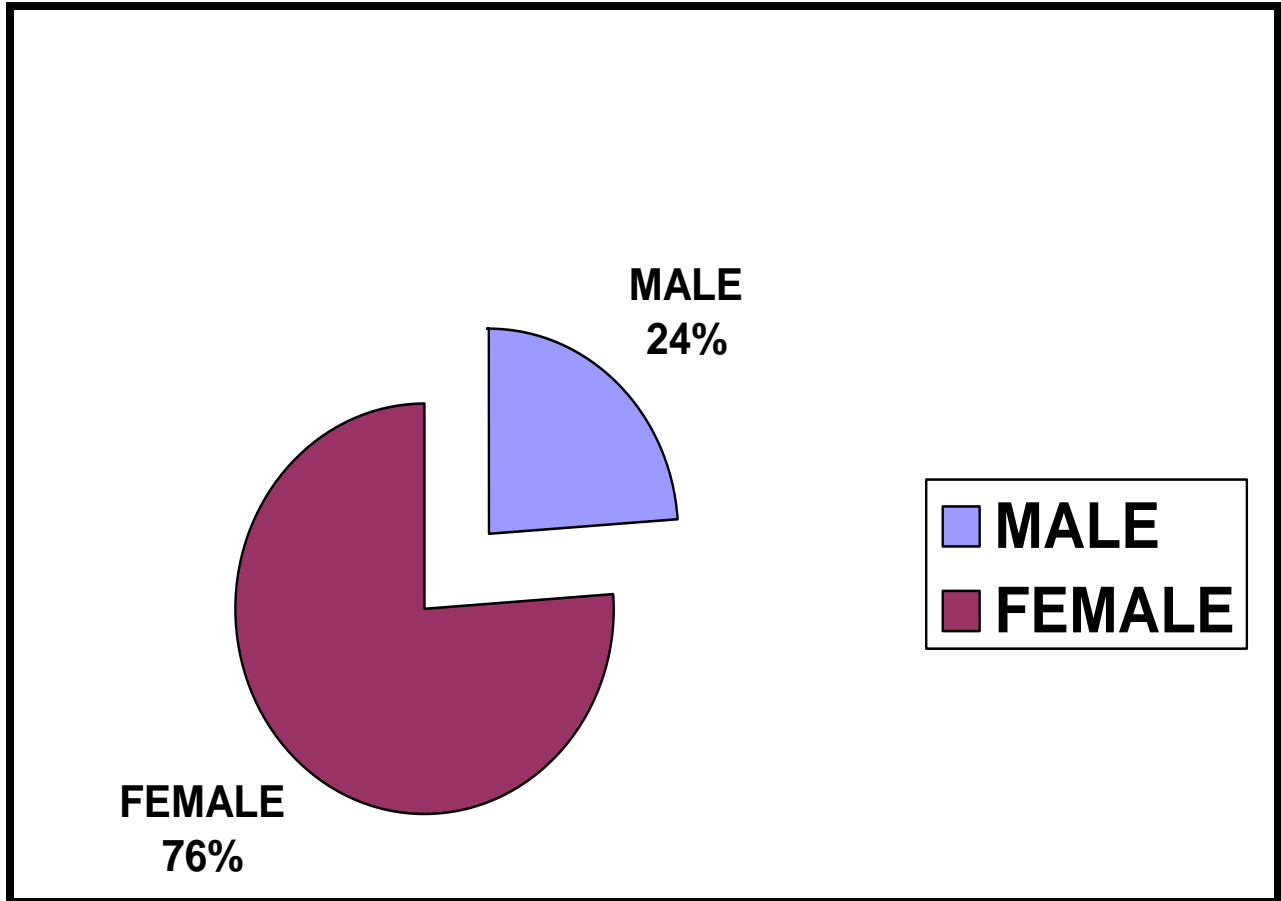


TABLE 3
College Place Public Schools
Staff Profile as of January, 2007

Table 3 College Place Public Schools Staff Profile. This table shows the numbers and percentages of employees in each job category according to sex and race. The bottom portion of Table 3 shows statistics from Walla Walla County Civilian Labor Force Figures from December of 2005.

College Place Public Schools Staff Profile as of January, 2007													
CLASSIFICATION	TOTAL STAFF	FEMALE		MALE		HISPANIC		ASIAN		BLACK		NATIVE AMERICAN	
		#	%	#	%	#	%	#	%	#	%	#	%
Certificated Administrators	6	2	33%	4	67%	0	0%	0	0%	0	0%	1	17%
Certificated Teachers	57	42	74%	15	26%	1	2%	0	0%	0	0%	1	2%
Classified	55	46	84%	9	16%	9	16%	0	0%	1	2%	0	0%
% Totals	118	90	76%	28	24%	10	8%	0	0%	1	.08%	2	2%
Walla Walla County Labor Force	28,740	12503	48.79%	3371	13.16%	3618	14.12%	390	1.52%	164	0.64%	312	1.22%
Walla Walla County Employed Labor Force	27,120	11457	42.88%	2767	11.76%	2803	11.92%	366	1.56%	156	0.66%	274	1.16%

TABLE 4
College Place Public Schools
Salary Ranges as of January, 2007

CLASSIFICATION	BEGINNING	EXPERIENCED
Certificated Administrators*	\$61,980	\$90,000
Teachers**	\$31,386	\$59,157
Educational Assistants	\$10.34	\$12.96
Classified	\$9.25	\$19.08
Classified Adm./Off-Schedule*	\$14.75	\$18.55

***Salary depends on position held**

****Salary depends on credits and experience**

X. IDENTIFICATION OF UNDERUTILIZATION AND IMPLICATIONS

Administrators

Summary: The analysis indicates that ethnic minorities and women are underutilized in this area. Further analysis identified ethnic minorities as being significantly underutilized.

These findings will be considered as the District plans and implements its future recruitment efforts to ensure the inclusion of all groups in such efforts.

Principals

Summary: The analysis indicates that women are underutilized in this area. Further analysis identified women as being significantly underutilized. These findings will be considered as the District plans and implements its future recruitment efforts to ensure the inclusion of all groups in such efforts.

Certificated Staff

Summary: The analysis indicates that ethnic minorities and men are underutilized in this area. Further analysis identified ethnic minorities as being significantly underutilized. These findings will be considered as the District plans and implements its future recruitment efforts to ensure the inclusion of all groups in such efforts.

Classified Staff

Summary: The analysis indicates that ethnic minorities and men are underutilized in this area. Further analysis identified ethnic minorities and men as being significantly underutilized. These findings will be considered as the District plans and implements its future recruitment efforts to ensure the inclusion of all groups in such efforts.

Educational Assistants/Para Pros

Summary: The analysis indicates that ethnic minorities are underutilized in this area. Further analysis identified ethnic minorities as being significantly underutilized. These findings will be considered as the District plans and implements its future recruitment efforts to ensure the inclusion of all groups in such efforts.

XI. PROGRAMS TO ACHIEVE AFFIRMATIVE ACTION GOALS

GOAL 1:

JOB ANALYSIS, RECRUITMENT AND SELECTION

The District's goal is to seek purposely and actively a diverse pool of qualified applicants from all protected groups, as well as non protected groups, for certificated and classified positions at all levels to ensure an increased opportunity for members of underrepresented groups to be considered for employment by the District.

Action Programs

1. Analyze job descriptions and the hiring process to make sure that qualifications requirements and screening criteria are based on specific job functions and do not have the effect of screening out protected group applicants who have the ability to perform

District Jobs

2. Ensure that recruitment efforts include and actually reach protected groups, as well as non protected groups. Focus recruitment on efforts that ensure underrepresented groups are reached.
3. Explore flex time and job sharing options as a means of enhancing positions for protected groups and other applicants.
4. Increase the awareness of Equal Employment Opportunity among all personnel involved in hiring, and have the Superintendent monitor all hiring.
5. Ensure that accurate information is maintained regarding the demographic make-up of the District's workforce.

GOAL 2:

EDUCATION AND TRAINING

The District's goal is to promote a culture of respect and diversity in the workplace, and to ensure that members of the District community are aware of the Affirmative Action Plan and their roles and responsibilities in enforcing the District's Policies concerning Equal Employment Opportunity.

Action Programs

1. Each staff member has responsibility for carrying out the equal employment strategies as outlined in the Affirmative Action Plan adopted by the District.
2. Provide support for schools to develop and carry out multi-cultural and gender equity training programs and special projects.

3. Provide multi-cultural training for personnel at the elementary and middle school, in conjunction with incorporating multi-cultural and gender equity concepts, awareness, and information into the curriculum.
4. Provide regular training and emphasis on providing a working environment free from unlawful discrimination.

GOAL 3:

PREVENTING EMPLOYMENT DISCRIMINATION BASED ON SEX

College Place Public School District No. 250 includes this goal and the following objectives to ensure that the District does not discriminate against any person on the basis of sex in employment, recruitment, promotion or advancement, and in order to incorporate the requirements of WAC 392-200-015.

Action Programs

1. Maintain credential requirements for all personnel.
2. Make no differentiation in pay scale on the basis of sex.
3. Make no differentiation in the assignment of school duties on the basis of sex, except where there is a compelling need for such qualification based on the nature of the duties; e.g. an assignment that involves supervising students in areas or situations where persons might be disrobed.
4. Provide the same opportunities for advancement without regard to sex.
5. Make no difference in conditions of employment including, but not limited to, hiring practices, leaves of absence, hours of employment and assignment of, or pay for, instructional and non instructional duties on the basis of sex.

APPENDIX A

POLICY 5010
Personnel
Page 1 of 3

NONDISCRIMINATION AND AFFIRMATIVE ACTION

1. Nondiscrimination

The College Place Public School District shall provide equal employment opportunity and treatment for all applicants and staff in recruitment, hiring, retention, assignment, transfer, promotion and training. Such equal employment opportunity shall be provided without discrimination with respect to race, creed, color, national origin, age, sex, marital status or qualified individuals with disabilities. The District may give preference to a United States citizen or national over an authorized alien if two candidates are equally qualified.

The School Board of Directors shall designate a staff member to serve as Affirmative Action/ Title IX Compliance Officer.

2. Affirmative Action

The College Place Public School District, as a recipient of public funds, is committed to undertake Affirmative Action which shall make effective Equal Employment Opportunities for staff and applicants for employment. Such Affirmative Action shall include a review of programs, the setting of goals and the implementation of corrective employment procedures to increase the ratio of aged, handicapped, ethnic minorities, women and Vietnam Veterans who are under-represented in the job classifications in relationship to the availability of such persons having requisite qualifications. Such Affirmative Action shall also include recruitment, selection, training, education and other programs.

The Superintendent shall develop an Affirmative Action plan which specifies the personnel procedures to be followed by the staff of the District and shall ensure that no such procedures discriminate against any individual. Reasonable steps shall be taken to promote employment opportunities of those classes that are recognized as protected groups--aged, handicapped, ethnic minorities and women and Vietnam Veterans.

This policy, as well as the Affirmative Action Plan, regulations and procedures developed according to it, shall be disseminated widely to staff in all classifications and to all interested patrons and organizations. Progress toward the goals established under this policy shall be reported annually to the School Board of Directors.

3. Employment of Persons with Disabilities

In order to fulfill its commitment of nondiscrimination to those with disabilities, the following conditions shall prevail:

A. No qualified person with disabilities shall, solely by reason of a disability, be subjected to discrimination, and the district shall not limit, segregate or classify any applicants for employment or any staff member in any way that adversely affects his/her opportunities or status because of a disability. This prohibition applies to all aspects of employment from recruitment to promotions and includes fringe benefits and other elements of compensation.

B. The District shall make reasonable accommodation to the known physical or mental limitations of an otherwise qualified disabled applicant or staff member unless it is clear that an accommodation would impose an undue hardship on the operation of the district program. Such reasonable accommodations may include:

1. Making facilities used by staff readily accessible and usable by persons with disabilities; and
 2. Job restructuring, part-time or modified work schedules, acquisition or modification of equipment or devices, the provision of readers or interpreters and other similar actions.
- In determining whether or not accommodation would impose an undue hardship on the district, factors to be considered include the nature and cost of the accommodation.

C. The District shall not make use of any employment test or criteria that screens out persons disabilities unless:

1. The test or criteria is clearly and specifically job-related; and
2. Alternative tests or criteria that do not screen out persons with disabilities are available.

D. While the District may not make pre-employment inquiry as to whether an applicant has a disability or as to the nature and severity of any such disability, it may inquire into an applicant's ability to perform job-related functions.

E. Any staff member who believes that there has been a violation of this policy or the law prohibiting discrimination because of a disability may initiate a grievance through the procedures for staff complaints.

- Cross References:** Board Policy 5270 Resolution of Staff Complaints
- Legal References:** RCW 28A.400.310 Law against Discrimination Applicable to District’s Employment Practices
- 28A.640.020 Regulations, Guidelines to Eliminate Discrimination--Scope
- 49.60 Law Against Discrimination
- 49.60.030 Freedom from Discrimination
- 49.60.180 Unfair Practices of Employer Defined
- WAC 162-22-050 Unfair practice
- 392-200 Employment Discrimination
- 392-200-15 Public School Employment—Affirmative Action Program
- Title VII of the Civil Rights Act of 1964
Title IX Educational Amendments of 1972
Title IX Education Amendments of 1974
P.L. 99-603 Immigration Reform and Control Act (IRCA) of 1986
- 42 U.S.C. SS 12101 - 12213 Americans with Disabilities Act
29 U.S.C. 706
- Executive Order 11246 Amended by Executive Order 11375
- 45 C.F.R. 84 Sec 504 Vocational Rehabilitation Act of 1973

Adoption Date: February 18, 2003

APPENDIX A-1

NONDISCRIMINATION AND AFFIRMATIVE ACTION PROCEDURES

1. Nondiscrimination

To ensure fairness and consistency, the following grievance procedure is to be used in the District's relationship with its staff with regard to employment problems covered by State and Federal Equal Employment Opportunity laws and/or this Affirmative Action Program. No staff member's status with the District shall be adversely affected in any way because the staff member utilized these procedures. As used in this procedure, "Grievance" shall mean a complaint which has been filed by a complainant (a student, an employee, a parent or guardian) relating to alleged violations of any anti-discrimination law including Title IX regulations and Washington Administrative Code (WAC) 392-190, Section 504 of the Rehabilitation Act of 1973, 42 U.S.C. SS 12101 - 12213 Americans with Disabilities Act (ADA) or Title VII of the Civil Rights Act of 1964. A complaint shall mean a charge alleging specific acts, conditions or circumstances, which are in violation of the anti-discrimination laws. A respondent shall mean the person alleged to be responsible or who may be responsible for the violation alleged in the complaint.

The primary purpose of this procedure is to secure an equitable solution to a justifiable complaint to this and, the following steps shall be taken:

Informal Review Procedures

When a staff member has an employment problem concerning equal employment opportunity, he/she shall discuss the problem with the immediate Supervisor, Personnel Director or Superintendent within 60 days of the circumstances which gave rise to the problem. The staff member may also ask the Title IX officer to participate in the informal review procedure. It is intended that the informal discussion shall resolve the issue. If the staff member feels he/she cannot approach the Supervisor because of the Supervisor's involvement in the alleged discrimination, the staff member may directly contact the Title IX Officer before pursuing formal procedures. If the discussion with the Officer or immediate Supervisor does not resolve the issue the staff member may proceed to the formal review procedures.

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Level One - Formal Review

The complaint must be signed by the complaining party and set forth the specific acts, conditions, or circumstances alleged to be in violation. The Title IX Officer shall investigate the allegations set forth within 30 calendar days of the filing of the charge.

The Officer shall provide the superintendent with a full written report of the complaint and the results of the investigation. The Superintendent shall respond in writing to the complainant as expeditiously as possible, but in no event later than 30 calendar days following receipt of the written complaint.

The Superintendent shall state that the District either:

- A.. Denies the allegations contained in the written complaint received by the District, or
- B. Shall implement reasonable measures to eliminate any such act, conditions or circumstance. Such corrective measures deemed necessary shall be instituted as expeditiously as possible, but in no event later than 30 calendar days following the Superintendent's mailing of a written response to the complaining party.

Level Two - Appeal to Board of Directors

If a complainant remains aggrieved as a result of the action or inaction of the Superintendent he/she may file a written notice of appeal with the Secretary of the Board by the 10th calendar day following:

- A. The date upon which the complainant received the Superintendent's response, or
- B. The expiration of the 30-calendar day response period stated in Level One, whichever occurs first.

The Board shall schedule a hearing to commence by the 20th calendar day following the filing of the written notice of appeal. Both parties shall be allowed to present such witnesses and testimony as the board deems relevant and material. The Board shall render a written decision by the 10th calendar day following the termination of the hearing and shall provide a copy to all parties involved.

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Level Three - Appeal to the Superintendent of Public Instruction

In the event a complainant charging discrimination remains aggrieved with the decision of the Board of Directors in connection with any matter which, if established, would constitute a violation, the complainant may appeal the Board's decision to the Superintendent of Public Instruction.

- A. A notice of appeal must be received by the Superintendent of Public Instruction on or before the tenth (10th) day following the date upon which the complainant received written notice of the Board of Directors' decision.
- B. A notice of appeal must be in writing in the form required by the Superintendent of Public Instruction and must set forth:
 - 1. A concise statement of the original complaint and the portions of the Board of Directors' decision which is appealed.
 - 2. The suggested recommendations for resolution or remediation of the alleged complaint set forth in the original statement of complaint.

Preservation of Records

The files containing copies of all correspondence relative to each complaint communicated to the District and the disposition, including any corrective measures instituted by the District, shall be retained in the office of the District Compliance Officer for a period of 5 years.

2. Affirmative Action

AFFIRMATIVE ACTION PLAN

The needs of all persons in a pluralistic society must be understood in order to continue to create an employment atmosphere compatible with and receptive to all persons. The following goals shall assure that a meaningful educational experience may continue to exist for students and staff alike. The District will:

- A. Modify the composition of the future work force with the most qualified applicant in order to work toward a full utilization of aged, handicapped, ethnic minorities, women and Vietnam veterans in the various job categories.

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- B.** Ensure that all applicants and staff are considered on the basis of bona fide job-related qualifications, and therefore the most qualified applicant will be awarded the position. The purpose of the Affirmative Action Plan is to include persons of under-utilized classes in the employment process, not to exclude others from it if they are the most qualified. The District shall continue to emphasize in all recruitment contacts that nondiscrimination is a basic element in the District's personnel procedures.
- C.** Be responsible for reviewing all employment procedures and programs to assure that there is no indication of discriminatory practices. The District shall continue to use aged, handicapped, ethnic minorities, women and Vietnam veterans in the recruitment and employment process in order to meet the diverse needs of our students and to employ the very best. Furthermore, the District will recruit potential employees in such places and fashion as to make this plan come to pass.
- D.** Contract and purchase all goods and services from persons, agencies, vendors, contractors and organizations who comply with the appropriate laws and executive orders regarding discrimination.
- E.** Take appropriate action to attract and retain the very best and consider the aged, handicapped, ethnic minorities and women at all levels and in all segments of the District's work force. Criteria for selecting staff shall be reviewed regularly to assure that such statements relate directly to the requirements for specific positions.
- F.** Upgrade present staff by providing applicable training to assure that individuals are prepared for positions of new and increased responsibility as it will assist in the attainment of District goals.

Implementation of the Affirmative Action Plan shall be the responsibility of the Superintendent. Administrators shall assist in the attainment of the established goals and purposes of this Affirmative Action Plan.

DISSEMINATION

The District shall disseminate information concerning employment and developments under the Affirmative Action Plan on a planned basis to assist in achieving the goals set forth in this Plan. Affirmative Action information shall be disseminated by:

- A.** Printing and distributing such information to staff and offices;
- B.** Publicizing such information in District newsletters;

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- C. Conducting meetings with administrative staff to explain the intent and advantages of the Policy and Plan;
- D. Conducting faculty meetings and meetings with classified staff;
- E. Informing appropriate and interested recruiting and hiring sources; and
- F. Informing all representative staff groups in the District.

Male/Female Balance and Staff Goals

The District shall see that efforts are made in the utilization of gender equality for higher levels of responsibility in both certificated and classified positions where a disparity may exist. The District shall make good faith effort to recruit, interview and employ individuals consistent with the District commitment to nondiscrimination and affirmative action for all positions and in every department, school and level of operation to ensure the highest quality staff possible. Demotions or termination shall not be used to meet stated goals. Qualified women should be employed in job categories where they are currently not represented or are under-represented and they are the best applicant for the position.

Administrators

Goal: To place qualified females in Administrative positions when and where a disparity exists and they are the most qualified.

To identify and encourage female staff with the potential of becoming Administrators to do so.

To identify qualified potential candidates from outside the District for future openings.

Principals and Assistant Principals

Goal: To place qualified females in Principal positions when and where a disparity exists and they are best applicant for the position.

Teachers

Elementary or grades K-8

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Goal: To provide each student with the opportunity to experience both male and female homeroom teachers during the primary as well as the intermediate grades.

Ethnic Minority Balance and Staff Goals

By the Commencement of the 2002 school year the District shall make a good faith effort to achieve a rate of employment for ethnic minorities in both certificated and classified areas as indicated in this plan. The District shall see that measurable efforts are made in the utilization of ethnic minorities for higher levels of responsibility in both certificated and classified positions. The District shall make good faith effort to recruit, interview and employ individuals consistent with the District commitment to nondiscrimination and Affirmative Action for all positions and in every department, every school and at every level of operation. Demotions or terminations shall not be used to meet stated goals. Qualified minorities should be employed in job categories where they are currently not represented or are under-represented provided they are the best qualified candidate for the position.

Support Staff - Certificated and Classified

Objective: To achieve a staff of certificated and classified support staff in which the percentage of ethnic minorities is comparable to that of the current ethnic minority student enrollment.

Aged Balance and Staff Goals

By the Commencement of the 2005 school year, the district shall strive to achieve a rate of employment for age categories for both certificated and classified staff as indicated in this Plan. The District shall make good faith effort to recruit, interview and employ individuals consistent with the commitment to nondiscrimination and affirmative action providing the prospective staff member meets the requisite standards for the specific position.

Administrators

Goal: To identify Administrative positions where age is not a barrier to performance.

Teachers

Goal: To provide opportunities for students to work with older staff in both curricular and extracurricular activities.

Support Staff - Certificated and Classified

Goal: To identify positions in the District, either full-time or part-time, where age does not limit the performance of the prospective staff member.

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Handicapped Balance and Staff Goals

By the Commencement of the 2005 school year, the District shall make a good faith effort to achieve a rate of employment for handicapped for both certificated and classified staff as indicated in this Plan. The District shall make good faith effort to recruit, interview, and employ individuals consistent with the District's commitment to nondiscrimination and Affirmative Action providing the prospective staff member meets the requisite standards for the specific position.

Administrators

Goal: To identify Administrative positions where a handicapping condition is not a barrier to performance.

Teachers

Goal: To provide opportunities for students to work with teachers who have handicapping conditions in both curricular and extracurricular activities.

Support Staff - Certificated and Classified

Goal: To identify positions within the District where a handicapping condition does not limit the performance of the prospective staff member.

INTERNAL AUDIT AND MONITORING SYSTEM

The Superintendent's Office, in compliance with WAC 162-12, "Preemployment Inquiry Guide," shall record by age, race, sex and other protected groups applicant flow, new hires, promotions, transfer requests, transfers, administrative internships and terminations. An analysis shall be made of the internal and external work force availability of aged, handicapped, ethnic minorities and women.

The District shall evaluate the effectiveness of the nondiscrimination and Affirmative Action Program and report its status to the board. Such reports may include recommendations for changes in the Affirmative Action Program goals. The overall responsibility for monitoring and auditing this Policy is assigned to the District Office. The duties include:

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- A. Analysis of the categories of employment in relation to Affirmative Action goals;
- B. Analysis of work force data and applicant flow;
- C. Maintaining records relative to Affirmative Action information;
- D. Preparation of reports of progress toward the goals and recommended changes required to maintain the vitality of the program;
- E. Identifying in a written report to the Superintendent any employment practice or policy that is discriminatory or that does not meet the requirements of the Affirmative Action Program; and
- F. Keeping the Superintendent advised of the progress in implementing the goals and procedures of this Affirmative Action Program.

GRIEVANCE PROCEDURE

To ensure fairness and consistency, the following review procedures are to be used in the District's relationship with its staff with regard to employment problems covered by State and Federal Equal Employment Opportunity Laws and/or this Affirmative Action Program. No staff member's status with the District shall be adversely affected in any way because the staff member utilized these procedures. As used in this procedure, "Grievance" shall mean a complaint which has been filed by a complainant (a student, an employee, a parent or guardian) relating to alleged violations of any anti-discrimination law including Title IX regulations and Washington Administrative Code (WAC) 392-190, Section 504 of the Rehabilitation Act of 1973 or Title VII of the Civil Rights Act of 1964. A complaint shall mean a charge alleging specific acts, conditions or circumstances, which are in violation of the anti-discrimination laws. A respondent shall mean the person alleged to be responsible or who may be responsible for the violation alleged in the complaint. The primary purpose of this procedure is to secure an equitable solution to a justifiable complaint to this and, the following steps shall be taken:

Informal Review Procedures

When a staff member has an employment problem concerning Equal Employment Opportunity, he/she shall discuss the problem with the immediate Supervisor, Personnel Director or Superintendent within 60 days of the circumstances which gave rise to the problem. The staff member may also ask the Affirmative Action/Title IX Officer to participate in the informal review procedure. It is intended that the informal discussion shall resolve the issue. If the staff member feels he/she cannot approach the Supervisor because of the Supervisor's involvement in the alleged discrimination, the staff member may directly contact the Affirmative Action/Title IX Officer before pursuing formal procedures. If the discussion with the Officer or immediate Supervisor does not resolve the issue the staff member may proceed to the formal review procedures.

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Level One - Formal Review

The complaint must be signed by the complaining party and set forth the specific acts, conditions, or circumstances alleged to be in violation. The Affirmative Action Officer shall investigate the allegations set forth within 30 calendar days of the filing of the charge. The Officer shall provide the Superintendent with a full written report of the complaint and the results of the investigation. The Superintendent shall respond in writing to the complainant as expeditiously as possible, but in no event later than 30 calendar days following receipt of the written complaint. The Superintendent shall state that the district either:

- A. Denies the allegations contained in the written complaint received by the District, or
- B. Shall implement reasonable measures to eliminate any such act, conditions or circumstance.

Such corrective measures deemed necessary shall be instituted as expeditiously as possible, but in no event later than 30 calendar days following the Superintendent's mailing of a written response to the complaining party.

Level Two - Appeal to Board of Directors

If a complainant remains aggrieved as a result of the action or inaction of the Superintendent he/she may file a written notice of appeal with the Secretary of the Board by the 10th calendar day following:

- A. The date upon which the complainant received the Superintendent's response, or
- B. The expiration of the 30-calendar day response period stated in Level One, whichever occurs first.

The Board shall schedule a hearing to Commence by the 20th calendar day following the filing of the written notice of appeal. Both parties shall be allowed to present such witnesses and testimony as the board deems relevant and material. The Board shall render a written decision by the 10th calendar day following the termination of the hearing and shall provide a copy to all parties involved.

Level Three - Appeal to the Superintendent of Public Instruction

In the event a complainant charging discrimination remains aggrieved with the decision of the Board of Directors in connection with any matter which, if established, would constitute a violation, the complainant may appeal the Board's decision to the Superintendent of Public Instruction.

- A. A notice of appeal must be received by the Superintendent of Public Instruction on or before the tenth (10th) day following the date upon which the complainant received written notice of the Board of Directors' decision.

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- B.** A notice of appeal must be in writing in the form required by the Superintendent of Public Instruction and must set forth:
1. A concise statement of the original complaint and the portions of the Board of Directors' decision which is appealed.
 2. The suggested recommendations for resolution or remediation of the alleged complaint set forth in the original statement of complaint.

Preservation of Records

The files containing copies of all correspondence relative to each complaint communicated to the District and the disposition, including any corrective measures instituted by the District, shall be retained in the office of the District Compliance Officer for a period of 5 years.

APPENDIX B

**College Place School District
Affirmative Action Officer**

**Tim Payne, Superintendent
107 SE 2nd St., College Place, WA 99324
TEL 509.525.4827
FAX 509.525.3741
tpayne@cpps.org**

**College Place School District No. 250
College Place, WA 99324**

Board of Directors

**Paul Hartwig – Chair Person
Julie Hill - Vice Chair Person
Bob Giger - Director
John Davin - Director
Dr. Ginger Ketting-Weller – Director**

Superintendent

Tim Payne

College Place School District #250

**107 SE 2nd St.
College Place, WA 99324
TEL 509.525.4827
FAX 509.525.3741**

APPENDIX C-1 – Staff Survey

**College Place School District No. 250
College Place, WA 99324**

In order to improve the accuracy of records College Place School District is required to keep to support its Affirmative Action Program (RCW 28A.300.040), please respond to the following survey and **return it to the District Office**. All responses are voluntary, and will remain anonymous. The response will not be identified by your name or worksite. *Please do not put your name on the survey*. If you are not willing to provide this information, please answer only the last question.

Please indicate the ethnic group to which you feel you most belong:

- Black/African American _____
- Asian/Pacific Islander _____
- Hispanic Origin _____
- American Indian/Eskimo/Aleut _____
- Caucasian _____
- Other (please specify) _____

Do you have a disability? Yes _____ No _____

Are you a Veteran? Yes _____ No _____

Are you a Vietnam Era Veteran? Yes _____ No _____
(Service between 8/5/64 and 5/7/75)

Are you 40 or more years old? Yes _____ No _____

Male _____ Female _____

Which of the following describes your job?

CLASSIFIED

- Educational Assistant _____ Administrative/Fiscal Assistant _____ Secretary _____
- Cooks/Food Service Assistant _____ Custodian _____ Bus Driver _____
- Transportation Supervisor _____ Technical Specialist _____ Business Manager _____

CERTIFICATED

- Teacher _____ Administrator _____ Special Program Director _____ Librarian _____ Psychologist _____
- Speech Pathologist _____ Superintendent _____

Are you willing to provide the foregoing information? Yes _____ No _____