Waukesha County Technical College

Equal Opportunity/ Affirmative Action

Five-Year Plan 2014-2019

WAUKESHA COUNTY TECHNICAL COLLEGE
800 Main Street
Pewaukee, Wisconsin 53072

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Introduction

Equal Opportunity / Affirmative Action Goals

July 1, 2014 – June 30, 2019

Waukesha County Technical College (WCTC) is committed to the Wisconsin Technical College System (WTCS) Board statewide affirmative action efforts, equal employment opportunity policies, and commitment to diversity. WCTC will implement an Equal Opportunity/Affirmation Action program to:

1. Balance individual occupational program enrollment percentages for students by race, sex and disability percentages in the general population.

2. Assure non-discrimination in career planning, counseling and placement services for students.

    * Analyze and report demographic, program enrollment and completion and job referral and placement data for minorities, women and disabled students and take steps to assure nondiscrimination in referral and placement services.

3. Analyze and address employment of faculty and staff within each district in the Wisconsin Technical College System to match availability percentages for race, sex and disability categories in the general population.

    * Implement a plan for recruiting and hiring minorities, women and disabled faculty and staff in all employment categories where there is under representation.

4. Create an educational and work environment that reflects, appreciates and celebrates the diverse society and community in which we live and one that creates a climate for the success of every person by appreciating the uniqueness that they bring to the technical college district.

    * Implement faculty and staff in-service programs, professional development activities, mentoring and student orientation programs to promote cultural, sex and disability awareness and sensitivity.

    * Integrate the history, culture, accomplishments and contributions of minorities, women and the disabled into curricula at each WTCS district.

    * Insure that cultural competency is practiced at every campus.

Section I
Equal Opportunity / Affirmative Action Policy Statement

Policy Statements:

WCTC has reviewed and updated our Equal Opportunity - Affirmative Action Discrimination/Harassment/Retaliation policy statement and complaint procedure. The updated policy and procedure include:

A. The identification of specific EEO / AA laws and executive orders that apply to the district.
B. A statement that equal opportunity, as required in Chapter 38, Wis. Stats. and the Wisconsin Fair Employment Law (Sec. 111.31-111.395, Wis. Stats.).
C. Affirmative Action is required for women, racial / ethnic minorities and persons with disabilities throughout the district in educational programs and job categories.
D. Affirmative action will be implemented in all employment practices including but not limited to: recruitment, hiring, transfers, promotions, training, layoffs, terminations, retention, certification, testing and committee appointments.
E. Harassment by employees or students on the basis of race, color, sex, national origin, age, disability or other protected status is an unlawful practice and is prohibited.
F. A procedure to process complaints, including the title, telephone number and address of the appropriate person(s) with whom to file the complaint and where copies of the procedures are available and/or can be obtained.
G. A statement that reasonable accommodations for persons with disabilities will be made to assure access to programs, employment and facilities.
H. A statement committing the district to providing services to students in a non-discriminatory manner and that the educational climate will be conducive to and supportive of cultural and ethnic diversity.
I. The district will provide reasonable accommodations to employees for religious observances and practices.
J. Responsibility for the district's Equal Opportunity/Affirmative Action Program is under the oversight of the Vice President, Human Resources. The Equal Opportunity/Affirmative Action Officer reports to the Vice President, Human Resources, and is responsible for developing, monitoring, and evaluating the Equal Opportunity/Affirmative Action plan in collaboration with the College's Diversity Committee. The title, telephone number and address of the Equal Opportunity/Affirmative Action Officer are included in the policy and in all public notification statements.
K. The policy has been signed and dated by the District President.
L. The district certifies that vendors and suppliers of services do not discriminate and that the policy of the district will be to encourage purchase of services and/or products from women, minority and disabled business owners. This statement is documented in the College's Administrative Procedure – Finance Procurement Fin-600-01.

ADMINISTRATIVE POLICY HUMAN RESOURCES
EQUAL OPPORTUNITY - AFFIRMATIVE ACTION
DISCRIMINATION/HARASSMENT/RETALIATION HUM-601

WCTC will comply with Titles VI and VII of the Civil Rights Act of 1964 as amended, the Civil Rights Restoration Act of 1987, and the Civil Rights Act of 1991; Title IX of the Educational Amendments Act of 1972; Section 504 of the Rehabilitation Act; The Americans With Disabilities Act (ADA) of 1990 and the ADA Amendments Act of 2008 (ADAAA); the Carl D. Perkins Vocational Education Act; the Equal Pay Act of 1973; the Age Discrimination Acts of 1967 and 1975; Title II of the Genetic Information Nondiscrimination Act of 2008 (GINA); the Wisconsin Fair Employment Law; the Office of Civil Rights Guidelines for Eliminating Discrimination and Denial of Services on the basis of Race, Color, national Origin, Sex and Handicap in Vocational Programs (34CFR Part 100, Appendix B) and other fair employment/education laws, executive orders, administrative directives and codes.

EQUAL OPPORTUNITY

The College will provide equal opportunity, as required in Chapter 38, Wis. Stats, and the Wisconsin Fair Employment Law (Sec. 111.31-111.395, Wis. Stats.), in all of its employment practices to all persons regardless of their political affiliation, age, race, religion, color, creed, religion, disability, gender, marital status, national origin, ancestry, citizenship, sexual orientation, parental status, pregnancy, family & medical leave, arrest or conviction record, membership in any reserve component of the armed forces, genetic information & testing, or use or non-use of lawful products off the College's premises during non-working hours, except when the characteristic or activity is a bona-fide job qualification.

The College will provide equal opportunity in all of its educational programs and services to all persons regardless of their race, color, religion, gender, national origin, disability, ancestry, lack of English skills, age, sexual orientation, pregnancy, marital status or parental status except when the characteristic is a bona-fide requirement for the educational program or service.

The College will provide reasonable accommodations for persons with disabilities to assure access to educational programs, employment, and facilities.

The College will provide reasonable accommodations for religious observances and practices.

AFFIRMATIVE ACTION

The College will have an affirmative action program for women, racial/ethnic groups and persons with disabilities in its educational programs and services and in all its employment practices including, but not limited to: recruitment, hiring, transfers, promotions, training, layoffs, terminations, retention, certification, testing, and committee appointments.

While the development and monitoring of the affirmative action program is primarily the responsibility of the Affirmative Action Officer (Manager, Talent Relations & Recruitment), the support of every employee, student and recipient of College services is required to assure an environment conducive to the success of the program.

DISCRIMINATION/HARASSMENT/RETALIATION

The College will maintain a learning and work environment free of illegal discrimination, including illegal harassment, for students and employees. Illegal discrimination/harassment is prohibited in all College employment practices, educational programs, services, activities, and events regardless of their location.

The College prohibits sexual harassment, which includes acts of sexual violence, as well as discrimination/harassment based on age, race, color, religion, disability, gender, marital status, sexual orientation, national origin, ancestry, pregnancy and other legally protected status. Harassment is defined as verbal and/or physical conduct that unreasonably interferes with an individual's work or academic performance, creates a hostile, intimidating or offensive environment or is the basis for an employment or

educational decision. More specifically, sexual harassment is unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature when:

1. Submission to such conduct is made either explicitly or implicitly as a term or condition of an individual's employment or educational status.
2. Submission to or rejection of such conduct by an individual is used as the basis for employment or educational decisions affecting the individual.
3. Such conduct has the purpose or effect of unreasonably interfering with an individual's work or educational performance or creating an intimidating, hostile or offensive working or learning environment.

Examples of behaviors that may be considered sexual harassment include, but are not limited to:

1. Unnecessary and unwelcome touching, grabbing, caressing, pinching or brushing up against a person.

2. Sexual comments or innuendoes, jokes or stories of a sexual, demeaning, offensive or insulting nature.

3. Requests for sexual favors as a condition of a favorable employment or educational action.

4. Deliberate, repeated display of sexually explicit or otherwise offensive posters, calendars or materials.

5. Whistles, cat calls, and sexual references (hunk, doll, babe, honey, sweetheart, fox, stud, etc.).

6. Sexual gestures with hands or body movements.

7. Asking unwelcome personal questions about a person's social or sexual life.

8. Repeatedly asking out a person who has stated he/she is not interested, or other unwelcome sexual advances.

9. Staring at a person or looking them up and down ("elevator eyes").

10. Sexual violence, including rape, sexual assault, sexual battery, and sexual coercion.

An employee who engages in discriminatory/harassing behavior or who retaliates against a person who either alleged he/she was discriminated against/harassed or participated in a discrimination/harassment investigation will be subject to discipline, up to and including termination. A student who engages in discriminatory/harassing behavior or who retaliates against a person who either alleged he/she was discriminated against/harassed or participated in a discrimination/harassment investigation will be subject to discipline, as outlined in the WCTC Student Code of Conduct, up to and including expulsion.

Harassment of employees and students from any person doing business with the College or others encountered in the course of the College's functions is also prohibited. While the College's ability to control the conduct of others may be limited, it will take appropriate action to address the harassment.

The Vice-President, Student Services, is the coordinator to ensure compliance regarding Title IX of the Education Amendments of 1972 and Section 504 of the Rehabilitation Act. Questions or complaints may be directed to:

Vice-President, Student Services
Waukesha County Technical College
800 Main Street
Pewaukee, WI 53072
Phone: 262.691.5240

Fax: 262.691-5087

Questions regarding affirmative action, equal opportunity or Title I of the Americans with Disabilities Act shall be directed to:

Manager, Talent Relations & Recruitment
Waukesha County Technical College
800 Main Street
Pewaukee, WI 53072
Phone: 262.691.5570
Fax: 262.691.5568

See Board Policy 3.3 Staff Treatment
See Wisconsin Statutes 38.23
See Wisconsin Administrative Code Chapter TCS 6
See Administrative Procedure – Human Resources HUM-601-01 Discrimination/ Harassment/Retaliation Complaints
See Administrative Policy – Student STU-400 Student Rights
See Administrative Policy – Student STU-500 Accommodation of Student Religious Beliefs
See Administrative Procedure – STU 500-01 Accommodation of Student Religious Beliefs

Policy owner: Vice President, Human Resource Services

REVISED: March 2013

An employee or student who believes he/she has been the subject of prohibited discrimination, harassment or retaliation has the option of pursuing his/her complaint on an informal or formal basis. In either case, the complaint should be made as soon as possible after the alleged discrimination/ harassment/retaliation occurred.

Administrators and supervisors have a duty to report any allegations of conduct that they reasonably believe may constitute discrimination or harassment to the designated individual as identified in the procedure below.

Any faculty or other staff member who knows of or receives information about a complaint of discrimination/harassment is strongly encouraged to report the information to the designated individual as identified in the procedure below.

INFORMAL PROCEDURE

Whenever possible, the complainant should attempt to resolve the issue directly with the person believed to have engaged in the prohibited behavior. The offensive behavior may have been thoughtless or based on the mistaken belief it was welcome. If the complainant is not comfortable doing so, he/she may seek the assistance of a third party to intervene on their behalf. Employees may seek assistance from their supervisor or department head or from a professional staff member of Human Resource Services. Students may seek assistance from their instructors, counselor, associate dean, dean or the Director of Student Development.

Even though a complaint is made on an informal basis, it will be thoroughly reviewed, investigated and attempted to be resolved to the complainant's satisfaction.

FORMAL PROCEDURE

1. FILING COMPLAINT: If the complaint is not resolved to the complainant's satisfaction through the informal process or if the complainant chooses to initially pursue the complaint through a formal process, the formal complaint may be filed no later than 300 days following the alleged incident of discrimination/harassment/retaliation. Students should file their complaint with the Director of Student Development, or if the Director of Student Development is alleged to have engaged in the discrimination/harassment/retaliation, the complaint should be filed with the Vice-President, Student Services. Employees should file their complaint with the Manager, Human Resources, or if the Manager, Human Resources is alleged to have engaged in the discrimination/harassment/retaliation, the complaint should be filed with the Vice-President, Human Resources. If the President is alleged to have engaged in the discrimination/harassment/retaliation, the complaint must be filed directly with the Board Chair. The complaint must be in writing and identify:

a) The date(s), time(s), place(s), circumstances and pertinent facts of the alleged discrimination/harassment/retaliation;
b) Any witnesses;
c) The individual(s), procedures or practices responsible for the alleged discrimination/harassment/retaliation.

2. **INVESTIGATION:** The Administrator receiving the complaint, or his/her designee, may initially attempt to resolve it to the satisfaction of the complainant by speaking to the complainant and/or alleged perpetrator(s). In all cases, if the complaint is not resolved to the satisfaction of the complainant, all reasonable efforts will be made to complete an investigation, determine findings, and recommend action(s) to be taken generally within thirty (30) College days of receipt of the written complaint, though additional time may be necessary to complete the investigation. The Administrator shall issue a written finding identifying the result of his/her review, including, but not limited to identifying any formal or informal resolution and any formal determination which the investigating Administrator has made.

3. REMEDIATION: If there is a finding of prohibited discrimination/harassment/retaliation by an employee, the Vice-President, Human Resource Services, and the employee's manager will determine appropriate disciplinary and/or other remedial action.

If there is a finding of prohibited discrimination/harassment/retaliation by a student the Director of Student Development will determine appropriate disciplinary and/or other remedial action pursuant to the Procedures Governing Student Conduct, Student Rights, and Student Complaints.

4. APPEAL

The complainant or alleged perpetrator may appeal it within ten (10) College days of receipt of the decision to the President, or Board Chair if the allegation is against the President. The basis for the appeal must be in writing and, except as required to explain the basis of new information, an appeal will be limited to a review of the record and supporting documents for one or more of the following purposes:

1. To determine whether the investigation was conducted fairly in light of the alleged violation(s) and information presented was in conformity with prescribed procedures. Deviations from designated procedures will not be a basis for sustaining an appeal unless significant prejudice results.

2. To determine whether there was sufficient information provided though the investigation and to establish that it is more likely than not that a violation of the College's policy has occurred.

3. To determine whether the discipline or sanction(s) imposed were appropriate based on the violation. Simple disagreement with the discipline or sanction is not sufficient grounds to change it.

4. To consider new information sufficient to alter a decision or other relevant facts not brought out in the original investigation, because such information and/or facts were not known or available. If additional information is offered or provided, the President may refer the matter back to the investigating Administrator to consider the new information, provide either party with an opportunity to respond to such new information, and to determine whether the findings should be changed.

The President or designee will review the record and determine whether to affirm or modify the decision. The decision on appeal will be made generally within thirty (30) College days and the complainant, alleged perpetrator, and the appropriate College executive will be notified in writing of the decision, consistent with applicable state and federal privacy laws.

See Wisconsin Statutes 38.23
See Wisconsin Administrative Code Chapter TCS-6
See Board Policy 3.3 Staff Treatment
See Administrative Policy- Human Resources HUM 601- Equal Opportunity - Affirmative Action Discrimination/Harassment/Retaliation
See Administrative Policy – Student STU-400 Student Rights
See Administrative Policy – Student STU-500 Accommodation of Student Religious Beliefs
See Administrative Procedure – Student STU-500-01 Accommodation of Student Religious Beliefs

Procedure owner: **Vice-President, Human Resource Services**

REVISED: **March 2013**

Section II

Dissemination of EO / AA Information

The following measures will be used to communicate to WCTC's community and the public of our commitment to Equal Opportunity and Affirmative Action in all employment and educational policies, procedures, programs, services, and opportunities:

- WCTC's Five-Year Equal Opportunity/Affirmative Action Plan will be distributed to the following persons or offices:
    - District Board of Trustees
    - College President
    - Management Staff
    - College Library
    - College Website

- Annual updates to the plan will be distributed to the above persons or offices when completed and published on the College website.

- The Equal Opportunity/Affirmative Action and Harassment Policy and Complaint Procedures will be reviewed each year and updated as required.

- The Equal Opportunity/Affirmative Action and Harassment Policy and Complaint Procedures are available to all employees through the College's online policy and procedure directory and are posted on employee bulletin boards or in work break areas. The policy and procedures are also accessible to employees, students, and the public through the College's website. They are also included in all new employee orientation materials and in the orientation materials for new students.

- The statement "An Equal Opportunity/Affirmative Action Employer/Educator" is included in all position opening advertisements. WCTC's Job Opportunities webpage also has a link to the College's Equal Opportunity/Nondiscrimination statement.

- The Equal Opportunity/Affirmative Action Policy Statement is included in the College's Schedule of Classes publication. This information is also included in the College's Student Handbook and includes information on who to contact on campus regarding a complaint.

- The College's Equal Opportunity/Affirmative Action Policy Statement is published annually in district local newspapers. The Equal Opportunity/Affirmative Action Statement is available and published in Spanish and includes a statement that the lack of English skills will not be barrier to admission and participation.

- Continuous nondiscrimination notification statements and notification of intent to reasonably accommodate disabilities will be included in recruitment materials and admission and application forms and communication alternatives such State Relay numbers are provided in the notification.

- Diversity training sessions are made available to students and/or staff.

Section III

Self-Evaluation

Self-evaluation consists of two parts, Federal and State Regulation Compliance contained in this section and Employment Compliance contained in Section IV.

Part A: Federal and State Regulations

I. Title VI, Civil Rights Act of 1964

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

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

☒ Yes ☐ No

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

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

☒ Yes ☐ No

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

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

☒ Yes ☐ No

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

☒ Yes ☐ No

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

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

☒ Yes ☐ No

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

☒ Yes ☐ No

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

☒ Yes ☐ No

II. Title IX - Self Evaluation

Procedural Requirements

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

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

☒ Yes ☐ No

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

☒ Yes ☐ No

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

☒ Yes ☐ No

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

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

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

☒ Yes ☐ No

Question: Can the district document its remedial action efforts?

☒ Yes ☐ No

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

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

☒ Yes ☐ No

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

☒ Yes ☐ No

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

Question: Has the district adopted such grievance procedures?

☒ Yes ☐ No

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

☒ Yes ☐ No

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

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

☒ Yes ☐ No

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

☒ Yes ☐ No

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

☒ Yes ☐ No

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

☒ Yes ☐ No

III. Section 504 - Self Evaluation

Procedural Requirements

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

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

☒ Yes ☐ No

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

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

☒ Yes ☐ No

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

☒ Yes ☐ No

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

☒ Yes ☐ No

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

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

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

☒ Yes ☐ No

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

☒ Yes ☐ No

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

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

☒ Yes ☐ No

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

☒ Yes ☐ No

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

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

☒ Yes ☐ No

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

☒ Yes ☐ No

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

☒ Yes ☐ No

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

Question: Did the district develop a transition plan?

☒ Yes ☐ No

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

☒ Yes ☐ No

Question: Is the transition plan available for review?

☒ Yes ☐ No

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

☒ Yes ☐ No

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

☒ Yes ☐ No

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

Procedural Requirements

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

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

☒ Yes ☐ No

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

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

☒ Yes ☐ No

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

☒ Yes ☐ No

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

☒ Yes ☐ No

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

☒ Yes ☐ No

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

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

☐ Yes ☒ No

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

☒ Yes ☐ No

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

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

☒ Yes ☐ No

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

☒ Yes ☐ No

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

☒ Yes ☐ No

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

☒ Yes ☐ No

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

☒ Yes ☐ No

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

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

☒ Yes ☐ No

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

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

☐ Yes ☒ No

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

☐ Yes ☒ No

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

☐ Yes ☒ No

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

☒ Yes ☐ No

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

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

☒ Yes ☐ No

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

☒ Yes ☐ No

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

☐ Yes ☒ No

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

☒ Yes ☐ No

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

☒ Yes ☐ No

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

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

☒ Yes ☐ No

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

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

☒ Yes ☐ No

10. Guideline VI(B) - Requires recipients to, if necessary, provide materials and information used as notification of opportunities for financial assistance to be distributed and communicated in a manner that it can be accessed by national origin minority persons with limited English language skills.

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

☒ Yes ☐ No

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

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

This does not apply to WCTC

☐ Yes ☐ No .

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

This does not apply to WCTC

☐ Yes ☐ No

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

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

☒ Yes ☐ No

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

☒ Yes ☐ No

13. Guideline VII(A) - Requires recipients to ensure that they do not discriminate against students on the basis of race, color, national origin, sex, or disability in making cooperative educational programs, job placement and apprentice training opportunities available to students; and that students participating in these types of programs are not discriminated against by employers or prospective employers in recruitment, hiring, placement, assignment to work tasks, hours of employment, levels of responsibility, and in pay; contracts or written agreements when used in relation to these opportunities must contain a statement of assurance indicating that

students will be accepted and assigned to jobs and otherwise treated without regard to race, color, national origin, sex, or disability.

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

☒ Yes ☐ No

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

☒ Yes ☐ No

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

☒ Yes ☐ No

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

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

☒ Yes ☐ No

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

☒ Yes ☐ No

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

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

☒ Yes ☐ No

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

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

☒ Yes ☐ No

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

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

☒ Yes ☐ No

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

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

☐ Yes ☒ No

V. Americans with Disabilities Act - Self Evaluation

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

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

☒ Yes ☐ No

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

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

☒ Yes ☐ No

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

☒ Yes ☐ No

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

☒ Yes ☐ No

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

☐ Yes ☒ No

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

☒ Yes ☐ No

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

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

☒ Yes ☐ No

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

☒ Yes ☐ No

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

☒ Yes ☐ No

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

☒ Yes ☐ No

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

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

☒ Yes ☐ No

Question: Where access involves back door or freight elevators, is such an arrangement used only as a last resort in cases where it provides accessibility

comparable to that provided to persons without disabilities who generally use front doors and passenger elevators?

☒ Yes ☐ No

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

☒ Yes ☐ No

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

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

☒ Yes ☐ No

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

☒ Yes ☐ No

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

☒ Yes ☐ No

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

☒ Yes ☐ No

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

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

☒ Yes ☐ No

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

☒ Yes ☐ No

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

☒ Yes ☐ No

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

☒ Yes ☐ No

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

☒ Yes ☐ No

VI. Wisconsin Fair Employment Act

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

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

☒ Yes ☐ No

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

☒ Yes ☐ No

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

☒ Yes ☐ No

VII. Chapter 38, Wis. Stats.

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

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

☒ Yes ☐ No

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

☒ Yes ☐ No

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

☒ Yes ☐ No

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

☒ Yes ☐ No

VIII. Contract for Services - TCS 8

Policy and Procedural Requirements Relating to Non Discrimination

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

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

☒ Yes ☐ No

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

☒ Yes ☐ No

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

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

☒ Yes ☐ No

Part B: Corrective Action – Voluntary Compliance Plan

For each item that is in non-compliance in the self-evaluation, prepare the following analysis using the form provided as Attachment 1 (Voluntary Compliance Plan for Career and Technical Education Programs):

A. ***Non-compliance Item*** -- identify the problem with compliance.

B. ***Objective*** – Specify actions needed to come into compliance.

C. ***Compliance*** -- develop a compliance plan including logical steps to be taken to come into compliance, a timetable should be included with a reasonable completion date.

D. In the 5 year plan or the next annual report, using the Voluntary Compliance Plan form, summarize actions taken to correct the status for any item which had been identified as being out of compliance in the district's self-analysis.

Note: The ***Voluntary Compliance Plan for Career and Technical Education Program*** form is available from the System Office in electronic format.

Section IV

Self-Analysis of Work Force and Goals Establishment

Self-Analysis

WCTC's total employment of minorities is at 8.8% (46 of 523 College full time and part-time staff, excluding adjunct instructors, casual, and temporary or student employees). The availability percentage in the district is at 10.79% based upon a weighted average of the availability percentages in each employment category. As a result; the College, overall, is not balanced for minority employment. Therefore, the College has a general goal of recruiting and hiring minority employees to match the weighted average availability percentage of an additional 2% (56.5 of 523)

The College employs disabled full time staff at a rate of 1.72% (9 of 523). Availability is at 4.33% in the district working age population. As a result, the College, overall, is not balanced for disabled employment. The College has an overall goal to employ disabled staff to achieve a percentage of 2.61% (23 of 523) mirroring the district working age disabled availability percentage.

Females are employed at a rate of 65.39% at the district. Weighted average of the availability percentages in each employment category is 47.11%. The College is not underutilized for females when looking at the weighted average availability in the total workforce. Therefore, the College has no general goal in this area.

Exec/Admin/Mgr.: WCTC currently employs eight (8) minorities with total employment of 59 in this category. Thus, current minority employment in this category is 13.6%. With pending retirements through June 2015 of three managers who are minorities, this would reduce the College's percentage to 8.5% if diverse hires are not made. The appropriate recruitment and employment availability has been determined to be *nation wide* based upon recruitment and hiring practices. The availability percentage of minorities in the *national work force* in this category is 17.3%. Therefore, the college has a goal of recruiting and hiring minority employees to match the availability percentage in this category of 8.8% (11 of 59).

Faculty: WCTC currently employs 14 minority faculty members with total employment of 220 in this category. Thus, current minority employment in this category is 5.91%. With pending retirements through June 2015 of four (4) instructors who are minorities, this would reduce the College's percentage to 4.5% if diverse hires are not made. The appropriate recruitment and employment availability has been determined to be *statewide* based upon recruitment and hiring practices. The availability percentage of minorities in the *statewide workforce* in this category is 11.81%. Therefore, the college has a goal to hire minority faculty to achieve a faculty category minority employment percentage of an additional 7.3% (26 of 220).

Professional Non Faculty: WCTC employs nine (9) minority employees with total employment of 48 in this category. Thus, current minority employment in this category is 18.75%. With pending retirements through June 2015 of three professionals, who are minorities, this would reduce the College's percentage to 12.5%. The appropriate recruitment and employment availability has been determined to be *statewide* based upon recruitment and hiring practices.

District availability figures show a minority workforce availability of 5.69%. Therefore, the college has no specific goal in this category.

Technical/Para-Professional: WCTC currently employs five (5) minority staff with total employment of 78 in this category. Thus, current minority employment in this category is 6.41%. The appropriate recruitment and employment availability has been determined to be *district wide* based upon recruitment and hiring practices. District availability figures show a minority workforce availability of 9.83%. Therefore, the college has a goal to hire minority technical/para-professionals to achieve a category minority employment percentage of an additional 3.42% (7.7 of 78)

Secretarial/Clerical: WCTC currently employs five (5) minority staff with total employment of 97 in this category. Thus, current minority employment in this category is 5.15%. The appropriate recruitment and employment availability has been determined to be *district wide* based upon recruitment and hiring practices. District availability figures show a minority workforce availability of 5.55%. Therefore, the college has a goal to hire minority secretarial/clerical staff to achieve a category minority employment percentage of an additional 0.93% (5.4 of 97)

Skilled Craft: WCTC currently employs no staff in this category.

Service Maintenance: WCTC employs six minority employees in this category with total employment of 22. Thus, current minority employment in this category is 27.3%. The appropriate recruitment and employment availability has been determined to be *district wide* based upon recruitment and hiring practices. District availability figures show a minority workforce availability of 7.53%. Thus, the college has no specific goal in this category.

DISTRICT NAME: **Waukesha County Technical College** November 2013-14

ORGANIZATIONAL LEVEL: **District**

DISTRICT WORK FORCE ANALYSIS AND GOALS

CATEGORY	TOTAL	FEMALES		RACIAL / ETHNIC GROUPS										PERSONS WITH DISABILITIES	
				Am Indian/Alaskan Native		Asian		Black/African American		Hispanic/Latino Origin		Native Hawaiian/ Other Pacific Islander			
		No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%
Exec./Adm./Mgr.[1]															
WCTC Employees	59	35	59.3%	0	0.00%	2	3.40%	2	3.4%	4	6.8%	0	0.00%	0	0.00%
National Labor Force			40.3%		0.4%		4.99%		7.2%		7.1%		.1%		
% Difference (+ or -)			19.0%		-0.4%		-1.59%		-3.8		-0.3		-0.1		N/A
Underutilizations (yes/no)			**No**		**Yes**		**Yes**		**Yes**		**Yes**		**Yes**		
Faculty															
WCTC Employees	220	121	55%	1	0.45%	1	0.45%	6	2.72%	5	2.21%	0	0.00%	0	0.00%
State Labor Force	28,295	13,995	49%	70	0.2%	2,365	8.4%	890	3.1%	955	3.4%	0	0		
% Difference (+ or -)			6%		0.25%		-7.95%		-0.38%		-1.19	0	0		
Underutilizations (yes/no)			**No**		**No**		**Yes**		**Yes**		**Yes**		**No**		
Professional Non Faculty															
WCTC Employees	48	34	71%	0	0.00%	1	2.08%	4	8.33%	4	8.33%	0	0.00%	1	2.08%
District Labor Force	15,915	11,027	69.29%	25	0.16%	217	1.36%	163	1.02%	310	1.95%	30	0.19%	497	3.12%
% Difference (+ or -)			1.71%		-0.16%		0.72%		7.31%		6.38%		-0.19%		-1.04%
Underutilizations (yes/no)			**No**		**Yes**		**No**		**No**		**No**		**Yes**		**Yes**
Technical/Para-Professional															
WCTC Employees	78	52	66.67%	1	1.28%	2	2.56%	1	1.28%	1	1.28%	0	0.00%	3	3.85%
District Labor Force	7,037	3,766	53.5%	0	0.00%	423	6.01%	40	0.57%	129	1.83%	0	0.00%	293	4.16%
% Difference (+ or -)			13.17%		1.28%		-3.45%		0.71%		-0.55%		0.00%		-0.32%
Underutilizations (yes/no)			**No**		**No**		**Yes**		**No**		**Yes**		**No**		**Yes**

Secretarial/Clerical															
WCTC Employees	97	96	98.97	1	1.03%	0	0.00%	1	1.03%	3	3.09%	0	0.00%	3	3.09%
District Labor Force	16,132	14,334	88.85%	34	0.21%	185	1.15%	85	0.53%	413	2.56%	0	0.00%	864	5.36%
% Difference (+ or -)			10.11%		0.82%		-1.15%		0.50%		0.53%		0.00%		-2.26%
Underutilizations (yes/no)			**No**		**No**		**Yes**		**No**		**No**		**No**		**Yes**
Skilled Craft (Not Applicable)															
Service/Maintenance															
WCTC Employees	21	4	19%	0	0.00%	0	0.00%	2	9.5%	4	19%	0	0.00%	2	9.5%
District Labor Force	18,531	9,971	53.81%	12	0.06%	229	1.24%	321	1.73%	1,088	5.87%	15	0.08%	1,209	6.52%
% Difference (+ or -)			-27.14%		-0.06%		-1.24%		7.77%		13.13%		-0.08%		2.98%
Underutilizations (yes/no)			**Yes**		**Yes**		**Yes**		**No**		**No**		**Yes**		**No**
District Totals															
WCTC Employees	523	342	65.39%	3	0.57%	6	1.15%	16	3.06%	21	4.02%	0	0.00%	9	1.72%
Combined Labor Force (weighted average %)	223,211	105,152	47.11%	185	0.08%	5,446	2.44%	2,302	1.03%	8,535	3.82%	45	0.02%	9,667	4.33%
% Difference (+ or -)			18.28%		0.49%		-1.29%		2.03%		0.19%		-0.02%		-2.61%
Underutilizations (yes/no)			**No**		**No**		**Yes**		**No**		**No**		**Yes**		**Yes**

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

Section V
Employment Program Affirmative Action Initiatives

GOAL 1: Increase the employment of persons of color, women, veterans, and persons with disabilities.		
Strategy/Activity	**Persons Responsible for Implementation**	**Timeframe**
Work with hiring managers on developing comprehensive recruitment plans which include: • targeting recruitment and outreach of diverse populations; • ensuring a qualified, diverse candidate pool; • ensuring diverse representation on interview teams.	Manager, Talent Relations & Recruitment and Employment Specialist	2013-14, ongoing
Participate in career fairs including the annual Milwaukee area City Diversity Career Fair and actively recruit diverse candidates.	Manager, Talent Relations & Recruitment and Employment Specialist	September 2013, ongoing
Identify and establish contacts with community-based organizations and participate in career fairs targeted toward employment of veterans.	Manager, Talent Relations & Recruitment and Employment Specialist	Spring 2014, ongoing
Identify and establish contacts with community-based organizations and participate in career fairs targeted toward employment of persons with disabilities.	Manager, Talent Relations & Recruitment and Employment Specialist	Spring 2014, ongoing
Partner with the College's Special Needs unit to assess the need for specific assistive technology for special needs candidates.	Employment Specialist; Director, Retention, Counseling, Special Services	Fall 2013
Improve marketing to targeted populations by enhancing the College's jobs webpage to reflect a diverse and welcoming environment.	Employment Specialist; Affirmative Action Officer, Marketing/ Community Outreach Department	Spring 2014
Method of Evaluation The Affirmative Action Officer and Employment Specialist, in collaboration with the Diversity Committee, will annually review, analyze, and report on the progress and effectiveness of these strategies based on: • Number of contacts with CBOs and other recruitment sources. • Number of contacts with diverse candidates. • Number and percentage of diverse candidates in the candidate pools. • Number and percentage of diverse hires. • Number and percentage of diverse hires retained after two years of hire.		

GOAL 2: Plan and conduct training for employees and students to increase awareness, knowledge and sensitivity on diversity/cultural competence.		
Strategy/Activity	**Persons Responsible for Implementation**	**Timeframe**
Provide training/learning opportunities for faculty, staff, and students to enhance cultural competence	Affirmative Action Officer in collaboration	Fall 2014 and

	with Diversity Team.	ongoing
Plan and conduct training on discrimination/sexual harassment awareness for employees.	Affirmative Action Officer in collaboration with Diversity Team and HR Specialist.	Fall 2014 and ongoing
Plan and conduct training for instructional staff on effective learning strategies that addresses multiculturalism.	Affirmative Action Officer in collaboration with Diversity Team and HR Specialist.	Fall 2014 and ongoing
Plan and conduct training to promote disability awareness and accessibility issues: • Americans with Disabilities Act • Section 504 • Deaf and hard of hearing • Mental illness	Affirmative Action Officer, Student Accessibility Office staff, HR Specialist	2013-14, ongoing
Plan and conduct a series of DuTalk© sessions to increase participants' skills in civil discourse on controversial issues related to diversity and inclusion.	Diversity Coordinator	2013-14, ongoing
Conduct Diversity Training Etiquette for students.	Diversity Coordinator	2013-14, ongoing
Conduct safe zone training to increase the College's network of safe and supportive allies to the lesbian, gay, bisexual, transgender, and queer community.	Diversity Coordinator, Affirmative Action Officer	Fall 2014; annually thereafter
Offer a College course on Introduction to Civility.	General Education Instructor	Fall 2014; annually thereafter
Method of Evaluation The Diversity Committee will annually review and analyze the effectiveness of training programs based on: • Number of employees and students attending. • Feedback of participants on effectiveness of programs.		

GOAL 3: Improve the retention of employees with focus on persons of color, women, veterans, and persons with disabilities.		
Strategy/Activity	**Persons Responsible for Implementation**	**Timeframe**
Implement a mentoring program for employees.	Human Resource Specialist; Affirmative Action Officer	2014 and ongoing
Method of Evaluation The Human Resource Specialist and Affirmative Action Officer will annually review and analyze the effectiveness of the program based on: • Number of participating employee mentees. • Number of participating mentors. • Number of mentees retained. • Feedback from mentees and mentors.		

GOAL 4: Establish collaborative partnerships with other colleges and business and community organizations to promote diversity initiatives.		
Strategy/Activity	**Persons Responsible for Implementation**	**Timeframe**
Establish a Diversity Advisory Council that includes	Affirmative Action	Spring

external partners to work in collaboration with the College's Diversity Committee to advocate and advise on diversity initiatives within the College community.	Officer; Diversity Coordinator; Diversity Team	2014 and ongoing
Method of Evaluation The Diversity Committee will annually review and analyze the effectiveness collaboration based on: • Feedback of participants.		
Collaborate with Waukesha community partners to plan and implement programs to celebrate Dr. Martin Luther King, Jr.'s principles of justice/equal rights, service to others, and acceptance of diversity.	Diversity Committee; External Partners	2013 and ongoing
Method of Evaluation The Diversity Committee will annually review and analyze the effectiveness of the program based on: • Number of participants. • Feedback from participants.		
Establish a partnership with Carroll University and the University of Wisconsin-Waukesha.	Diversity Coordinator	Fall 2013
Method of Evaluation The Diversity Coordinator will annually review and analyze the effectiveness of the partnerships based on: • Number of participants. • Feedback from participants.		
Enhance collaboration with Easter Seals by providing work projects to support training of individuals with disabilities.	Vice-President, Human Resources; Affirmative Action Officer	2013 and ongoing
Method of Evaluation The Vice-President, Human Resources and Affirmative Action Officer will annually review and analyze the effectiveness of the collaboration based on: • Number of participants. • Feedback from Easter Seals representatives.		

Section VI
Students

Waukesha County Technical College is committed to ensuring equal opportunity for all categories of students in all educational areas. The College has conducted an analysis of the educational program areas to identify those programs that are under-utilized for minorities, females or disabled students using the Compliance Indicator Reports (VE 215660, VE 215670, VE 215680, and VE 215690).

Enrollment – Programs

Self-Analysis

Statistics show two program areas reported in the State Compliance Reporting Indicator I – Program Areas (Service and Industrial) report which shows underutilization of Asian students. The analysis reveals that the total number of Asian students (22) in the programs which constitutes 1.86% of students in the programs combined. Over the period of the plan, WCTC wishes to increase Asian (and other minority) student population in these areas.

GOAL 1: Improve the enrollment of students of color, women, and individuals with disabilities into programs.		
Strategy/Activity	**Persons Responsible for Implementation**	**Timeframe**
Expand outreach programs and services targeting students of color, women, and individuals with disabilities.	Recruitment Coordinator-Diversity; Recruitment Supervisor	2013-14, ongoing
Method of Evaluation The Recruitment Coordinator-Diversity and Recruitment Supervisor will annually review and analyze the effectiveness of the program based on: • Number of diverse students contacted. • Number of diverse students enrolled in programs annually.		

Completion Rates

Although overall 2013-14 graduation rates generally reflect improvements over the 2012-13 year for minority groups (12.13 percent compared to 11.67 percent), females completion rates remained relatively the same (60.68 percent compared to 60.92 percent), and students with disabilities completion rates decreasing a bit (4.88 percent compared to 5.52 percent), an analysis of graduates by program, as documented in the Compliance Indicator I-Program Areas Report (VE215660) for 2011-12, show some populations out of compliance in the following program areas:

Business:	Blacks: -4.11%	Hispanics: -3.31%		
Marketing:	Blacks: -5.24%			
Graphics:	Blacks: -2.28%			
Health:	Blacks: -1.85%	Hispanics: -1.08%		
Industrial:	Females: -32.29%			
Service:	Females: -4.72%	Disabled: -5.59%	Blacks: -5.23%	Hispanics: 4.15%
Technical and Television:		Asians: -2.17%		
Gen Ed:	Asian: -3.02%	Black: -4.79%	Hispanic: -4.87%	
Fam/Cons Ed:		Black: -5.26%	Hispanic: -3.88%	

GOAL 1: Improve the retention and completion rates of students of color.		
Strategy/Activity	**Persons Responsible for Implementation**	**Timeframe**
Implement a mentoring program for students of color to increase retention and the chance that minority students will persist in college by learning to navigate the college system, attending classes, studying effectively, and connecting with peers utilizing the same success strategies. This program has been awarded grant funding for 2013-14 year. Second year 2014-15 received GPR grant to fund 60 student; 20 student mentors and 40 student mentees.	Diversity Coordinator	2013-14, 2014-15 ongoing
Method of Evaluation 2013-14, The Diversity Coordinator will annually review and analyze the effectiveness of the program based on: • Number of participating student mentees (projected 30 first-year students). • Number of participating mentors (15 student peers, 15 faculty, staff and administrators). • Number of student mentees retained. 47 students participated in the mentoring program and 41 students completed the program successfully for a success rate of 87%.Four students posted a 4.0 cumulative GPA, thirteen students posted a 3.0 cumulative GPA or higher. We look forward to growing the program in the fall; 50 students initially applied to be Students Mentors, 90 students initially applied to be Mentees, but we only had funds for 47 students this academic year. 2014-15, The Diversity Coordinator will annually review and analyze the second year effectiveness of the program based on: • Number of participating student mentees (projected 40 first-year students). • Number of participating mentors (20 student peers, 20 faculty, staff and administrators). • Number of student mentees retained. The Mentoring Program is 100% GPR funded, we will have to explore other options for year three.		
Conduct focus groups with students of color to identify specific needs and services.	Diversity Coordinator; Institutional Research and Effectiveness Staff	Spring 2014
Method of Evaluation • Results of survey identifying specific needs and services. • Feedback on effectiveness of current services.		
GOAL 2: Improve the retention and completion rates of students with disabilities through enhanced academic support services.		
Strategy/Activity	**Persons Responsible for Implementation**	**Timeframe**
Implement the College policy to ensure closed captioning for all media used for instructional purposes. Provide training and resources to faculty and staff.	Director, Counseling, Special Services & Academic Support; Director, Academic Technology & Curriculum	2013, ongoing

Method of Evaluation The Director, Counseling, Special Services & Academic Support will review and analyze the effectiveness based on: • Compliance with the policy. • Cost effectiveness.		
GOAL 3: Improve the retention and completion rates of students, with a focus on students of color, women, and individuals with disabilities.		
Strategy/Activity	**Persons Responsible for Implementation**	**Timeframe**
Maintain a campus food pantry for students to meet their basic nutritional needs and assist them in being successful in their academic studies.	Assistant Director, Student Development	2013, ongoing
Method of Evaluation The Assistant Director, Student Development will review and analyze the effectiveness of the campus food pantry based on: • Number of students participating. • Donations received.		

Instructions - Student Counseling and Placement

The College has implemented processes to ensure nondiscrimination in counseling and placement services of minority, female, and disabled students.

GOAL 1: Enhance counseling and advising services to ensure students utilize services to support their educational goals.		
Strategy/Activity	**Persons Responsible for Implementation**	**Timeframe**
Implement mid-term status reports to identify and assist students in improving their academic performance.	Director, Student Development in collaboration with Student Success Team	Fall 2013 and ongoing
Method of Evaluation The Student Success Team is investigating a comprehensive system that would allow the College to flag students who are at a no-pass status, as well of those who are flagged through other means, and be sure they are provided with the appropriate interventions very early on in the semester. At this time, Academic Advisors and Counselors use the no-pass data when meeting with students to discuss other resources they can access on campus.		
GOAL 2: Enhance placement services to ensure students utilize services to support their educational goals.		
Strategy/Activity	**Persons Responsible for Implementation**	**Timeframe**
Continue to ensure that employers provide notice of non-discrimination in employment in order to be eligible for referrals of graduates to employment opportunities.	Coordinator, Co-op/SES	Ongoing
Method of Evaluation The Coordinator, Co-op/SES will maintain records of non-discrimination notices from employers.		
Provide annual training to Student Employment Services staff on fair employment laws.	Coordinator, Co-op/SES; Affirmative Action Officer	Fall 2013 and annually
Method of Evaluation The Coordinator, Co-op/SES will review and analyze the effectiveness based on:		

- Compliance with fair employment laws.

Section VII
Annual Reports
Annual Progress Reports - District

WCTC will submit an annual report to the WTCS Office on the progress of accomplishing goals identified in our Equal Opportunity/Affirmative Action.

EEOC Report Categories

1 = ADMINISTRATIVE. Include persons whose assignments require primary (and major) responsibility for management of the institution, or a customarily recognized department or subdivision thereof. Assignments require the performance of work directly related to management policies or general business operations of the institution, department or subdivision, etc. It is assumed that assignments in this category customarily and regularly require the incumbent to exercise discretion and independent judgment, and to direct the work of others. Report in this category all officers holding such titles ad Director or Administrator or the equivalent. Report in this category Deans, Directors, or the equivalents, as well as Associate Deans, Assistant Deans, and executive officers of academic departments (chairpersons, heads or equivalents) if their principal activity is administrative. Also include supervisors of professional employees.

2 = FACULTY. Include all persons whose specific assignments customarily are made for the purpose of conducting instruction, research, or public service as a principal activity (or activities), and now hold academic rank titles of professor, associate professor, assistant professor, instructor, lecturer, or the equivalent of any one of these academic ranks. Report in this category Deans, Directors, or the equivalents, as well as Associate Deans, Assistant Deans, and executive officers of academic departments (chairpersons, heads, or the equivalent) if their principal activity is instructional. Do not include student teaching or research assistants.

3 = PROFESSIONAL NON-FACULTY. Include persons whose assignments would require either college graduation or experience of such kind and amount as to provide a comparable background. Included would be all staff members with assignments requiring specialized professional training who should not be reported under Executive (1) and who should not be classified under any of the four "non professional" categories of activities.

4 = CLERICAL / SECRETARIAL. Include persons whose assignments typically are associated with clerical activities, or are specifically of a secretarial nature. Include personnel who are responsible for internal and external communications, recording and retrieval of data (other than computer programmers) and/or information and other paperwork required in an office, such as bookkeepers, stenographers, clerk typists, office machine operators, statistical clerks, payroll clerks, etc. Also include sales clerks such as those employed full-time in the bookstore, and library clerks who are not recognized as librarians.

5 = TECHNICAL / PARAPROFESSIONAL. Include persons whose assignments require specialized knowledge or skills which may be acquired through experience or academic work such as is offered in many two-year technical institutes, junior colleges or through equivalent on-the-job training. Include computer programmers and operators, drafters, engineering aides, junior engineers, mathematical aides, licensed practical or vocational nurses, dietitians, photographers, radio operators, scientific assistants, technical illustrators, technicians (medical, dental, electronic, physical sciences), and similar occupations not properly classifiable in other occupational-activity categories but which are institutionally defined as technical assignments. Include persons who perform some of the duties of a professional or technician in a supportive role, which usually require less formal training and/or experience normally required for professional or technical status.

6 = SKILLED CRAFTS. Include persons whose assignments typically require special manual skills and a thorough and comprehensive knowledge of the processes involved in the work, acquired through on-the-job training and experience or through apprenticeship or other formal training programs. Include mechanics and repairers, electricians, stationary engineers, skilled machinists, carpenters, compositors and typesetters.

7 = SERVICE / MAINTENANCE. Include persons whose assignments require limited degrees of previously acquired skills and knowledge, and in which workers perform duties which result in or contribute to the comfort, convenience and hygiene of personnel and the student body or which contribute to the upkeep and care of buildings, facilities or grounds of the institutional property. Include chauffeurs, laundry and dry cleaning operatives, cafeteria and restaurant workers, truck drivers, bus drivers, garage laborers, custodial personnel, gardeners and groundskeepers, refuse collectors, construction laborers, security personnel.

VOLUNTARY COMPLIANCE PLAN FOR CAREER AND TECHNICAL EDUCATION PROGRAMS

NAME OF DISTRICT _____ **DATE OF SUBMISSION** _____

NON-COMPLIANCE ITEM AND REGULATION: _____

OBJECTIVE(S):

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