Waukesha County Technical College

Equal Opportunity/Affirmative Action

Five Year Compliance Plan

2005/2010
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Equal Opportunity/Affirmative Action

2005-2010

Goals

1. Balance individual occupational program enrollment percentages for students by race, gender and special population availability.

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/or other special population students and take steps to assure non-discrimination in referral and placement services.

3. Analyze and address employment of faculty and staff within the Waukesha County Technical College District to match appropriate utilization/availability percentages for racial, gender and disabled categories.
   * 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 each and every person by appreciating the uniqueness that they bring to the college district.
   * Implement faculty and staff in-service programs, professional development activities, mentoring and student orientation programs to promote multi-cultural, gender and special population awareness and sensitivity.
   * Integrate the history, culture, accomplishments and contributions of minorities, women and special populations into curricula within the Waukesha County Technical College district.
   * Insure that cultural competency is practiced at every campus.
Section II

Equal Opportunity/Affirmative Action Policies

WAUKESHA COUNTY TECHNICAL COLLEGE

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; Title IX of the Educational Amendments Act of 1972; Section 504 of the Rehabilitation Act; The Americans With Disabilities Act of 1990; the Civil Rights Act of 1991; the Carl D. Perkins Vocational Education Act; the Equal Pay Act of 1973; the Age Discrimination Acts of 1967 and 1975; the Civil Rights Restoration act of 1987; 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 Disability 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 in all of its employment practices to all persons regardless of their political affiliation, age, race, religion, color, disability, marital status, sex, national origin, ancestry, sexual orientation, pregnancy, arrest or conviction record. Membership in any reserve component of the armed forces, genetic 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, sex, national origin, disability, ancestry, age, sexual orientation, pregnancy, marital status or parental status except when the characteristic is a bona-fide requirement for the educational program or service.

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 its employment practices. While the development and monitoring of the affirmative action program is primarily the responsibility of the Co-Director–Human Resource Services, 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 as well as harassment based on age, race, color, religion, disability, 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:

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”).

An employee who engages in discriminatory/harassing behavior or who retaliates against a person who either alleged they were 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 they were discriminated against/harassed or participated in a discrimination/harassment investigation will be subject to discipline, 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.

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: Director of Human Resource Services

REVISED: August, 2004
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.

**INFORMAL PROCEDURE**

Whenever possible, the complainant will 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 attempt to be resolved to the complainant’s satisfaction.

**FORMAL PROCEDURE**

1. **FILING COMPLAINT:** 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 must file their complaint with the Director of Student Development. Employees must file their complaint with the Director of Human Resource Services. These persons will send a copy of the complaint to the President. If either of these persons is alleged to have engaged in the discrimination/harassment/retaliation, the complaint must be filed directly with the President. 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 administrative person receiving the complaint, or their 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 within thirty (30) business days of receipt of the written complaint.

   If an employee complainant is still not satisfied, he/she has the redress specified in their labor agreement or grievance processes in college policies and procedures.

   If a student complainant is still not satisfied, he/she may appeal it pursuant to the Procedures Governing Student Conduct, Student Rights and Student Complaints.

3. **REMEDATION:** If there is a finding of prohibited discrimination/harassment/retaliation by an employee, the Director of 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.

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
See WCTEA & WCESSU Union Contracts

Procedure owner: Director of Human Resource Services

REVISED: August, 2004
DISSEMINATION OF EO/AA INFORMATION

The Affirmative Action Plan and annual updates will be distributed to the following persons or offices when published:

- District Board of Trustees
- College President
- Management Staff
- Bargaining Union Presidents
- College Library
- College Website

The Equal Opportunity/Affirmative Action and Harassment Policies and Complaint Procedures are reviewed each year.

The Equal Opportunity/Affirmative Action and Harassment Policies and Complaint Procedures are available to all employees. They are also included in all new employee orientation materials and in the orientation materials for new students.

Policies and procedures are posted on employee bulletin boards and available online.

The statement “An Equal Opportunity/Affirmative Action Employer/Educator” is included in all position opening advertisements.

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.

Once a year, the College’s Equal Opportunity/Affirmative Action Policy Statement will be published in the District’s local newspaper. The Equal Opportunity/Affirmative Action Statement is available in Spanish, which includes a statement that the lack of English skills will not be a barrier to admission and participation.

Statements of equal opportunity and special accommodations will be included in recruitment materials and admission and application forms.

Diversity training sessions are made available to students and staff.
- Self Evaluation -

I. Title VI, Civil Rights Act of 1964

1. **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 non-discrimination 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 participant 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

2. **Regulation 80.4 (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

3. **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

4. **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(c), "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 in such manner necessary to apprise persons of the protections assured by the Act and this regulation?

Yes  No

**Title IX - Self Evaluation Procedural Requirements**

**II.**

1. **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 non-discrimination 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 magazines 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 name, address and telephone number?

Yes  No

**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 non-compliance 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 name, address, and telephone number has been given to students, parents, and employees?

Yes  No
2. **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

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 86.3 (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

5. **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.

*Preceding questions are applicable to this regulation.*
III. Section 504 - Self Evaluation

Procedural Requirements

1. **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 in admission or access to, or treatment or employment in its programs and activities.

   *Question:* Has a policy statement of non-discrimination on the basis of handicap 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

2. **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 name, address, and telephone number been given to students, parents and employees?

   ☑ Yes    ☐ No

3. **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
4. **Regulation 84.5** - Requires each recipient to submit an assurance stating that no otherwise qualified disabled persons shall safely, by reason of handicap, 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 non-discrimination on the basis of disability?

☐ Yes  ☐ No

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

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

☐ Yes  ☐ No

**Question:** Does the district have the results of the 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

6. **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.

**Preceding questions are applicable to this regulation.**

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 handicapped 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. OCR 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, which are accessible to all regardless of race, color, or national origin?

☐ Yes ☐ No

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 LES students and to assess their ability to participate?

☐ Yes ☐ No

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

☐ Yes ☐ No

Question: Have steps been taken by the district to open all programs to LES students?

☐ Yes ☐ No

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

☐ Yes ☐ No
2. **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 handicapped students access to educational programs and courses?

☐ Yes ☒ No

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

☒ Yes ☐ No

3. **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 non-discrimination 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 handicap?

☒ Yes ☐ No

**Question:** Does the announcement provide information on course offerings, admissions criteria, and the name and phone number of the coordinators of Title IX and Section 504?

☒ Yes ☐ No

**Question:** Is the announcement communicated in the native language of national origin minorities?

☒ Yes ☐ No

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

☒ Yes ☐ No

4. **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 handicap.
**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 handicap?

☐ Yes  ☐ No

5. **Guideline V (B)** - Requires recipients operating educational programs to ensure that counselors do not direct or urge any student to enroll in a particular career or program 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 handicap; and if there is disproportionate enrollment of either sex, minority group, or handicapped 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 / national origin, sex, or handicap?

☐ 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/national origin, sex, or handicap?

☐ Yes  ☒ No

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

☐ Yes  ☒ No

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

☒ Yes  ☐ No

6. **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 handicap.

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

☒ 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 handicap?

☒ Yes  ☐ No

**Question:** Do the materials which are used in recruiting or promotional efforts limit the portrayal of career opportunities or tend to perpetuate or create stereotypes or limitations are not race, national origin, sex, or handicap through text or illustration?
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-speaking minorities and handicapped persons to receive promotional literature and comparable recruitment efforts in a medium in which they can communicate?

☑ Yes ☐ No

7. **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 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 impairments.

☑ Yes ☐ No

8. **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?

☑ Yes ☐ No

9. **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-speaking 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-speaking skills?

☑ Yes ☐ No

10. **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 handicapped students.

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

☑ Yes ☐ No
**Question:** Is the housing provided for handicapped students comparable, convenient and offered at the same cost and conditions as for other students?

☐ Yes  ☐ No

11. **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 the handicapped persons.

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

☐ Yes  ☐ No

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

☐ Yes  ☐ No

**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 handicap.

**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 handicap?

☐ 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 agreement for the referral or assignment of students to an employer?

☐ Yes  ☐ No
12. **Guideline VII (B)** - If written agreement with a labor union or other sponsor providing apprentice training is used, requires recipients 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.

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

☑ Yes ☐ No

**Question:** Is there a written agreement, which contains an assurance that they do not discriminate against its members or applicants?

☑ Yes ☐ No

13. **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 handicap.

**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 handicap?

☑ Yes ☐ No

14. **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 handicap.

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

☑ Yes ☐ No

15. **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 handicapped (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 handicapped applicant or employee?

☑ Yes ☐ No

16. **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 handicapped.
**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 handicap?

☒ Yes ☐ No

V. Contracts 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, handicap, political persuasion, ancestry, or sexual orientation against students and employees?

☒ 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, handicap, 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 employers?

☒ Yes ☐ No

VI. Americans with Disabilities Act - Self Evaluation

1. **Guideline II-3.2000** - 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. **Guideline II-3.3000 and II-3.4000** - 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 the 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. **Guideline II-3.5000** - 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 (non personal item) 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. **Guideline II-5.0000** - 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, or activities, when viewed in their entirety, to 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. **Guideline II-7.0000** - Provides that a public entity must ensure that its communication with individuals with disabilities is 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 which 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 and consultation to 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. **Guideline II-8.0000** - 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 (and on file) a self-evaluation plan which identifies all of the 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 State Board Facilities Coordinator for inclusion in the district's five-year facility plan?

☑ Yes ☐ No

**Question:** Has the district provided information on Title II's requirements to applicants, participants, beneficiaries, and other interested persons who explain Title II'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 Title II?

☑ 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

**VII. 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, handicap, marital status, sex, national origin, ancestry, sexual orientation, arrest record, conviction record, membership in the national guard, state defense force or any other reserve component of the military forces of the United States or the state of Wisconsin, 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/or other testing prohibited by the Wisconsin Fair Employment Act?

☑ Yes ☐ No
VIII.  Chapter 38, Wis. Stats.

1. **Chapter 38, Wis. Stats.** - Provides for District Board powers and duties. Includes the requirement 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, 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

**Question:** Does the district, in October of each year, forward a summary of student complaints by date, issue and disposition to the Wisconsin Board's DHR?

☑ Yes  ☐ No
District Employment
Self Analysis and Goals

General Workforce Goals:

Total district employment of minorities is at 6.6% (33 of 501 college full time staff). The availability percentage in the district is at 8.24% 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 (41 of 501).

The college employs disabled full time staff at a rate of 1.8% (9 of 501). Availability is at 6.79% 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 6.79% (34 of 501) mirroring the district working age disabled availability percentage.

Females are employed at a rate of 63.5% at the district. Weighted average of the availability percentages in each employment category is 56.24%. The college is not under utilized for females when looking at the weighted average availability in the total workforce. Therefore, the college has no general goal in this area.

Specific Workforce Category Goals:

Exec/Admin/Mgr.: WCTC currently employs three minorities with total employment of 31 in this category. Thus, current minority employment in this category is 9.68%. The appropriate recruitment and employment availability has been determined to be national wide based upon recruitment and hiring practices. The availability percentage of minorities in the national workforce in this category is 17.3%. Therefore, the college has a specific goal of recruiting and hiring minority employees to match the availability percentage in this category (5.4 of 31).

Faculty: WCTC currently employs 12 minority faculty members with total employment of 208 in this category. Thus, current minority employment in this category is 5.8%. 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 specific goal to hire minority faculty to achieve a faculty category minority employment percentage of 11.81% (24.6 of 208).

Secretarial/Clerical: WCTC currently employs 4 minority staff with total employment of 97 in this category. Thus, current minority employment in this category is 4.12%. 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 3.36%. Thus, the college has no specific goal in this category.

Professional Non Faculty: WCTC employs 7 minority employees with total employment of 70 in this category. Thus, current minority employment in this category is 10%. 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 4.75%. Therefore, the college has no goal in this category.

Technical/Para-Professional: WCTC currently employs 4 minority staff with total employment of 69 in this category. Thus, current minority employment in this category is 5.8%. 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 4.46%. Thus, the college has no specific goal in this category.

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

**Service Maintenance:** WCTC employs 3 minority employees in this category with total employment of 26. Thus, current minority employment in this category is 11.54%. 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.
<table>
<thead>
<tr>
<th>CATEGORY</th>
<th>TOTAL</th>
<th>FEMALES</th>
<th>RACIAL / ETHNIC GROUPS</th>
<th></th>
<th></th>
<th></th>
<th>PERSONS WITH DISABILITIES</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>Black</td>
<td>No.</td>
<td>%</td>
<td>No.</td>
<td>%</td>
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<tr>
<td>Exec./Adm./Mgr.¹</td>
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<td>National Labor Force</td>
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<td>Yes</td>
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<tr>
<td>Faculty</td>
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<td>WTCs District Employees</td>
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<td>51.44</td>
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<td>State Labor Force</td>
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<td>47.32</td>
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<td>Professional Non Faculty</td>
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<td>WTCs District Employees</td>
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<td>67.14</td>
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<td>District Labor Force</td>
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</tbody>
</table>

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.
## DISTRICT WORK FORCE ANALYSIS AND GOALS

<table>
<thead>
<tr>
<th>CATEGORY</th>
<th>TOTAL</th>
<th>FEMALES</th>
<th>RACIAL / ETHNIC GROUPS</th>
<th>PERSONS WITH DISABILITIES</th>
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<tr>
<td>Technical/Para-Professional</td>
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<td>WTCS District Employees</td>
<td>69</td>
<td>48</td>
<td>69.57</td>
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<td>District Labor Force</td>
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<td>65.02</td>
<td>35 0.74</td>
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<tr>
<td>WTCS District Employees</td>
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<td>96</td>
<td>98.97</td>
<td>1 1.03</td>
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<td>District Labor Force</td>
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<td>26,446</td>
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<td>144 0.42</td>
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<td>+21.6</td>
<td>+0.61</td>
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<td>Skilled Craft (Not Applicable)</td>
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<td>WTCS District Employees</td>
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<td>District Labor Force</td>
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<td>% Difference (+ or -)</td>
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<td>Underutilizations (yes/no)</td>
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<tr>
<td>CATEGORY</td>
<td>TOTAL</td>
<td>FEMALES</td>
<td>RACIAL / ETHNIC GROUPS</td>
<td>PERSONS WITH DISABILITIES</td>
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<td>---------------------</td>
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<td></td>
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<td>Black</td>
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<tr>
<td></td>
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<td>%</td>
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<td>Service/Maintenance</td>
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<td>3.85</td>
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<td>District Labor Force</td>
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<td>13790</td>
<td>1064</td>
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<td>District Totals</td>
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<tr>
<td>WTCS District Employees</td>
<td>501</td>
<td>318</td>
<td>13</td>
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<tr>
<td>Combined Labor Force</td>
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<td>+1.08</td>
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<td>Underutilizations (yes/no)</td>
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<td>No</td>
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</table>
Affirmative Action
Employment Program Initiatives

General Program 1: Increase overall minority employment

**Program Initiative A:** Develop and implement faculty and staff in service and orientation programs to promote minority employment awareness and sensitivity.

<table>
<thead>
<tr>
<th>Activity/Steps</th>
<th>Persons Responsible for Implementation</th>
<th>Timetable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Review of current programs, training, and curriculum on special population employment for faculty and staff</td>
<td>Co-Director-Human Resource Services, Diversity Council, Human Resources Staff</td>
<td>2007-08</td>
</tr>
<tr>
<td>Development of new curriculum as necessary</td>
<td>Co-Director-Human Resource Services</td>
<td>2007-08</td>
</tr>
<tr>
<td>Conduct orientation of all staff</td>
<td>Co-Director-Human Resource Services</td>
<td>2008-09</td>
</tr>
</tbody>
</table>

**Program Initiative B:** Create a Diversity Council to advise the President and President’s Cabinet on matters related to minority and disabled staff employment, the status of the diversity climate, and the status of the practice of Cultural Competency on each campus.

<table>
<thead>
<tr>
<th>Activity/Steps</th>
<th>Persons Responsible for Implementation</th>
<th>Timetable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Develop Council charge, membership structure and operations procedures. Prepare an Executive Order of the President</td>
<td>President, Co-Director-Human Resource Services</td>
<td>2006</td>
</tr>
<tr>
<td>Appoint membership and conduct meeting(s)</td>
<td>Co-Director-Human Resource Services and Student Staff Development</td>
<td>2006-07</td>
</tr>
<tr>
<td>Evaluate Council effectiveness and make changes as necessary</td>
<td>President and President’s Cabinet</td>
<td>2007-08</td>
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</tbody>
</table>

**Program Initiative C:** Review and revise hiring process to assure appropriate availability of targeted candidates in interview process.

<table>
<thead>
<tr>
<th>Activity/Steps</th>
<th>Persons Responsible for Implementation</th>
<th>Timetable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Review and develop revised hiring process.</td>
<td>Co-Director-Human Resources Services</td>
<td>2005-06</td>
</tr>
<tr>
<td>Train hiring managers on new process</td>
<td>Co-Director-Human Resources Services, Human Resource Specialist</td>
<td>2005-06</td>
</tr>
<tr>
<td>Implement new hiring process</td>
<td>Co-Director-Human Resources Services, Hiring Managers</td>
<td>2006</td>
</tr>
</tbody>
</table>
General Program 1: Methods of Evaluation:

The in service and orientation programs will be evaluated through participant evaluations and by contact with student and employee organizations. In addition, the Diversity Council will report to the President and President’s Cabinet on the effectiveness of efforts on the diversity climate and the status of the practice of cultural competency.

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

2005-2006:

2006-2007:

2007-2008:

2008-2009:

2009-2010: Final Summary Report

General Program 2: Increase employment of people with disabilities

Program Initiative A: Expand within-district outreach and recruitment contacts with disabled advocate organizations.

<table>
<thead>
<tr>
<th>Activity/Steps</th>
<th>Persons Responsible for Implementation</th>
<th>Timetable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Develop a comprehensive listing of various community based advocacy organizations within the district</td>
<td>Co-Director-Human Resource Services, Human Resources Staff, Special Services Staff, Diversity Council</td>
<td>2006-07</td>
</tr>
<tr>
<td>Design outreach materials and prepare a presentation on WCTC employment targeted at disabled in all employment categories</td>
<td>Co-Director-Human Resource Services, Human Resources Staff, Special Services Staff, Diversity Council</td>
<td>2007-08</td>
</tr>
<tr>
<td>Contact organizations and/or make presentations to elicit assistance in recruitment of disabled staff</td>
<td>Co-Director-Human Resource Services, Human Resources Staff, Special Services Staff, Diversity Council</td>
<td>2008-09</td>
</tr>
</tbody>
</table>

Program Initiative B: Develop and implement a disabled candidate host program to assist candidates during interview and post interview situations.

<table>
<thead>
<tr>
<th>Activity/Steps</th>
<th>Persons Responsible for Implementation</th>
<th>Timetable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Design a Host Program to host and assist disabled candidates while on campus for interview situations</td>
<td>Diversity Council, Co-Director-Human Resource Services, HR Generalist, Special Services Staff</td>
<td>2007-08</td>
</tr>
<tr>
<td>Establish specific budgetary support for special advertising to promote WCTC as an employer of choice for disabled</td>
<td>Co-Director-Human Resource Services, Communications Manager</td>
<td>2008-09</td>
</tr>
</tbody>
</table>
General Program 2: Methods of Evaluation:

The number of disabled in the total WCTC workforce will be evaluated annually by the Co-Director-Human Resource Services. Increased disabled staff will be a general indicator of success. Each initiative involved in a specific recruitment will be reviewed during the post review of the recruitment conducted by the Co-Director-Human Resource Services, Deans and Human Resources Staff.

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

2005-2006:

2006-2007:

2007-2008:

2008-2009:

2009-2010: Final Summary Report

Employment Categories-- Programs:

Program 1: Increase minority Executives/Administrators

Program Initiative: Develop national recruitment strategies to assure minority candidate participation for key administrative vacancies including Vice Presidents, Deans, Associate Deans and Managers of administrative departments.

<table>
<thead>
<tr>
<th>Activity/ Steps</th>
<th>Persons responsible for Implementation</th>
<th>Timetable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Evaluate current recruitment efforts for executive/administrative positions; Investigate possible expansion or revisions; investigate possible cooperative efforts with other technical colleges recruiting and hiring on a national basis</td>
<td>Co-Director-Human Resource Services, Human Resources Staff</td>
<td>2006</td>
</tr>
<tr>
<td>Pre-research national search firms analyzing their results obtained in providing quality minority candidates for other Technical Colleges in the State/Midwest Develop a preferred list of search firms to solicit in case of vacancies</td>
<td>Co-Director-Human Resource Services, Human Resources Staff</td>
<td>2006-07</td>
</tr>
<tr>
<td>Review certification requirements for Executives and Administrators and discuss/request possible updates or changes which would allow broader recruitment possibilities for those positions</td>
<td>President, Vice Presidents, Co-Director- Human Resource Services, Certification Officer</td>
<td>2007-08</td>
</tr>
<tr>
<td>Develop the college’s “national presence” at appropriate National/Regional organizations for Executive and Administrative positions. Plan and implement long term strategy making Waukesha County Technical College attractive to top minority candidates in these positions</td>
<td>President, Vice Presidents, Co-Director, Human Resource Services</td>
<td>2008-09</td>
</tr>
</tbody>
</table>
Program 1: Methods of Evaluation:

The number of Executive/Administrative minority staff will be evaluated annually by the Co-Director-Human Resource Services. Increased minorities will be a general indicator of success. Each initiative involved in specific executive/administrative recruitment will be reviewed during the post review of the recruitment conducted by the Co-Director-Human Resource Services, President, and Vice President.

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

2005-2006:

2006-2007:

2007-2008:

2008-2009:

2009-2010: Final Summary Report

Program 2: Increase minority Faculty

Program Initiative A: Investigate the extension of recruitment and hiring areas for faculty category of employment and possibly develop joint statewide minority recruitment activities with other Technical Colleges and area Universities.

<table>
<thead>
<tr>
<th>Activity/ Steps</th>
<th>Persons responsible for Implementation</th>
<th>Timetable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Evaluate current recruitment efforts for faculty positions; Investigate possible expansion or revisions; investigate possible cooperative efforts with area post secondary schools such as technical colleges, universities or two year university campuses</td>
<td>Co-Director-Human Resource Services, Human Resources Staff, VP for Learning Innovations, Deans and Associate Deans</td>
<td>2006</td>
</tr>
<tr>
<td>Implement combined recruitment campaigns targeted at minority faculty</td>
<td>Co-Director-Human Resource Services, Human Resources Staff, Recruitment Coordinator, Certification Officer</td>
<td>2006-07</td>
</tr>
<tr>
<td>Implement a pre-screening of applicants to assure certification eligibility; establish an eligible for interview list of qualified candidates to be shared with consortia participants</td>
<td>Co-Director-Human Resource Services, Recruitment Coordinator, Certification Officer</td>
<td>2007-08</td>
</tr>
</tbody>
</table>
Program Initiative B: Expand outreach and recruitment contacts with community based organizations, tribal affiliates and minority organizations.

<table>
<thead>
<tr>
<th>Activity/Steps</th>
<th>Persons Responsible for Implementation</th>
<th>Timetable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Develop a comprehensive listing of various community based organizations, minority clubs and organizations, and tribal organizations</td>
<td>Human Resources Staff, Diversity Council</td>
<td>2005-06</td>
</tr>
<tr>
<td>Design outreach materials and prepare a presentation on WCTC faculty employment targeted at minorities in all employment categories</td>
<td>Director-Counseling, Retention and Special Services, Diversity Council, Deans and Associate Deans</td>
<td>2006-07</td>
</tr>
<tr>
<td>Contact all organizations and/or make presentations to elicit assistance in minority faculty recruitment for the college</td>
<td>Co-Director-Human Resource Services, Recruitment Coordinators, Diversity Council</td>
<td>2007-08</td>
</tr>
</tbody>
</table>

Program Initiative C: Develop and implement a faculty candidate host program to assist candidates during interview and post interview situations.

<table>
<thead>
<tr>
<th>Activity/Steps</th>
<th>Persons Responsible for Implementation</th>
<th>Timetable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Design a Host Program to assist minority and other faculty candidates while on campus for recruitment or interview situations</td>
<td>Diversity Council, VP for Learning Innovations, Deans, Associate Deans Co-Director-Human Resource Services</td>
<td>2007-08</td>
</tr>
<tr>
<td>Establish budgetary support for payment of interview expenses for candidates</td>
<td>Co-Director-Human Resource Services</td>
<td>2007-08</td>
</tr>
</tbody>
</table>

Program 2: Methods of Evaluation:

The number of minority faculty will be evaluated annually by the Co-Director-Human Resource Services. Increased minority faculty will be a general indicator of success. Each initiative involved in a specific recruitment will be reviewed during the post review of the recruitment conducted by the Co-Director-Human Resource Services, VP for Learning Innovations, Deans and HR Staff.

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

2005-2006:

2006-2007:

2007-2008:

2008-2009:

2009-2010: Final Summary Report
Students
Part A

Enrollment—General

Waukesha County Technical College has conducted an analysis and is establishing the following goals/initiatives for educational and service program areas which are under-utilized for minorities, females or students with disabilities. The analysis was conducted using data from the client accounting system and the series of equal opportunity compliance reports provided by the State Office of the Wisconsin Technical College System. While this analysis was based on that data, Waukesha County Technical College believes the availability population for our students is smaller based on Census 2000 statistics for our district, ages 16-64.

A review of the student enrollment statistics in various program categories and analysis by the Equal Opportunity Standing Committee reveals the need for a college-wide initiative relating to data collection.

State Report VE 215 660 (Students by Program) shows a number of “unknowns” for the student racial/ethnic data. There are 487 of 9,939 or 4.9% students reported in Compliance Indicator I—Students by Program Areas who are in that situation. The College’s Co-Director-Human Resource Services believes that many of these students may fall into a protected category.

Unknowns

Compliance Indicator I-Program Enrollment Statistics, Report VE 215 660, shows a large number of “Unknowns” (disability and minority status data) for students. Experience has shown that minority and students with disabilities are reluctant to provide such data yet the college develops services and programs for inclusion based upon this data. For school year 2003-2004, 9,939 students were considered to be enrolled in college programs. Unknowns constituted 4.9% of this total or 487 students. Since females, disabled and minorities are specifically numerically identified in the report, the “unknowns” default to “white male” for calculation purposes. As a result, efforts to collect accurate data for “unknowns” is critical to a data supported compliance effort for females, disabled and minorities.

Program Initiative: Develop an active and escalating approach to collection and reporting of accurate data on ethnicity, gender and disability status for all students.

<table>
<thead>
<tr>
<th>Activity/ Steps</th>
<th>Persons Responsible for Implementation</th>
<th>Timetable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Develop Supplementary Follow up Contact Program for voluntary provision of data on ethnic, sex and/or disability status of students reported as unknowns</td>
<td>Diversity Council, Student Admissions, Recruitment, and Enrollment Staff</td>
<td>2006-07</td>
</tr>
<tr>
<td>Evaluation of Unknowns after implementation of ascending data collection methodology</td>
<td>Diversity Council and Co-Director- Human Resource Services, Registrar, Director of Enrollment Management</td>
<td>2008-09</td>
</tr>
</tbody>
</table>
**Method of Evaluation:**

The Diversity Council together with the Registrar, Director of Enrollment Management and Co-Director-Human Resources will annually review the “unknowns” listed in Compliance Indicator I, Report VE 215 660 generated by the State Office. Where unknowns are clustered in general program areas, Deans from those programs will be contacted and involved in targeted approaches for their areas. If data collection improvement is evidenced, activities will be re-evaluated to determine the most effective implementation activities for inclusion in following registrations of students. Where elements of the program efforts are unsuccessful, those activities will be revised or dropped.

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

2005-2006:

2006-2007:

2007-2008:

2008-2009:

2009-2010 Final Summary Report
Part A

Enrollment—Programs

Analysis of Students by Programs contained in Compliance Indicator I—Programs (Report VE 215660) reveals the need for action in four reported program areas: Marketing, Industrial, Health, Service and Technical. Analysis was conducted using a one percent confidence interval in availability/participation as suggested by the state office. The following findings resulted:

Marketing and Graphics Programs: Statistics show the female population to be present in the marketing program at numbers slightly less than those reported as available in the district population (49.05% vs. 50.78%). In addition a recent review conducted by a College Advancement review team indicted concerns related to minority retention in the Graphics Design Associate Degree program.

One action plan can be implemented for each of the separate programs:

<table>
<thead>
<tr>
<th>Activity/Steps</th>
<th>Persons Responsible for Implementation</th>
<th>Timetable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Develop new recruitment and retention activities targeted at females and minorities</td>
<td>Dean, Associate Deans, Director of Enrollment Management, Director-Counseling, Retention and Special Services, Instructors</td>
<td>2005-06</td>
</tr>
<tr>
<td>Implement Recruitment /Retention Activities</td>
<td>Dean, Associate Deans, Director of Enrollment Management, Director-Counseling, Retention and Special Services and Instructors</td>
<td>2006-07</td>
</tr>
<tr>
<td>Conduct Analysis of Enrollment in program, conduct training of teachers to celebrate gender diversity and to assure non-discrimination based upon sex in class situations</td>
<td>Director-College Advancement, Co-Director-Human Resource Services, VP for Learning Innovations, Dean and Associate Deans</td>
<td>2007-08 and Continuing</td>
</tr>
<tr>
<td>Continue, modify or discontinue targeted efforts to insure narrow tailoring</td>
<td>Director-College Advancement, Co-Director-Human Resource Services, VP for Learning Innovations, Deans and Associate Deans</td>
<td>2007-08</td>
</tr>
</tbody>
</table>

Method of Evaluation:

The statistical reports will be reviewed annually by the Co-Director-Human Resources in consultation with the Director-College Advancement; VP for Learning Innovations, and the Deans/Associate Deans of the Marketing and Graphics program. Appropriate involvement of Student Services staff and the instructional staff participating in recruitment activities will be assured. Where programs have had a positive effect on female program enrollments they will be continued or modified as necessary. Where programs have been unsuccessful, they will be replaced with other types of efforts. If enrollments have come into minimal balance, programs will be evaluated for the need to continue on an on-going basis so as to institute narrow tailoring of the targeted activities.
Annual Progress (Give a report each year of the 5 year plan.)

2005-2006:

2006-2007:

2007-2008:

2008-2009:

2009-2010 Final Summary Report

-----------------------------------------------
Trade and Industry:

Statistics show two program areas reported in the State Compliance Indicator I—Program Areas (Industrial and Technical) report which are under-utilized for females. Since both programs are located in the Industrial and Engineering Division of WCTC, combined analysis of the statistics seems appropriate. Such analysis reveals that the total number of female students (148) constitutes 6.7% of students in the combined programs. Availability data reveals that a full participation rate would be at 50.78% (census data). The minimal compliance rate target suggested by the State Office is 25%. The goal, therefore, is to meet the 25% goal over the period of this plan.

<table>
<thead>
<tr>
<th>Activity/Steps</th>
<th>Persons Responsible for Implementation</th>
<th>Timetable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Develop new long-term recruitment activities targeted at females including</td>
<td>Dean, Director of Enrollment Management, Director-Counseling, Retention and Special Services, Instructors</td>
<td>2005-06</td>
</tr>
<tr>
<td>team visits to both middle schools and high schools to promote female</td>
<td></td>
<td></td>
</tr>
<tr>
<td>participation in the trade and industry programs</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Implement Recruitment Activities</td>
<td>Dean, Director of Enrollment Management, Director-Counseling, Retention and Special Services, Instructors</td>
<td>2006-07</td>
</tr>
<tr>
<td>Conduct Analysis of enrollment in program, conduct training of teachers to</td>
<td>VP for Learning Innovations, Director-College Advancement, Co-Director-Human Resource Services</td>
<td>2007-08</td>
</tr>
<tr>
<td>celebrate gender diversity and to assure non-discrimination based upon sex in</td>
<td></td>
<td>and Continuing</td>
</tr>
<tr>
<td>class situations</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Continue, modify or discontinue targeted efforts to insure narrow tailoring</td>
<td>VP for Learning Innovations, Dean, and Co-Director-Human Resource Services</td>
<td>2007-08</td>
</tr>
</tbody>
</table>
Method of Evaluation:

The statistical reports will be reviewed annually by the Co-Director-Human Resources in consultation with the VP for Learning Innovations and the Dean and Associate Dean of the Industrial and Engineering Technology Division. Appropriate involvement of Counseling, Retention and Special Services will be assured. Where programs have had a positive effect on female program enrollments they will be continued or modified as necessary. Where programs have been unsuccessful, they will be replaced with other types of efforts. If enrollments have come into minimal balance, programs will be evaluated for the need to continue on an on-going basis so as to institute narrow tailoring of the targeted activities.

Annual Progress (Give a report each year of the 5 year plan.)

2005-2006:

2006-2007:

2007-2008:

2008-2009:

2009-2010 Final Summary Report

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Health: Derived statistics show a participation rate of 17.12% for males as opposed to an availability rate of 49.22% in the district population. As health services are a traditionally female dominated occupation, efforts will be made to enlighten and recruit males into this occupational area. The health program is large with 2,705 students. As a result, a significant number of males will need to be recruited over some period of time to effectuate compliance at the minimal level of 25%. In addition, planning will be needed to assure that waiting lists will not deter male students from declaring this program area.

<table>
<thead>
<tr>
<th>Activity/Steps</th>
<th>Persons Responsible for Implementation</th>
<th>Timetable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Develop new long term recruitment activities targeted at males</td>
<td>VPs for Learning Innovations, Director of Enrollment Management, Dean, Associate Dean, Director-Counseling, Retention and Special Services, Recruitment Coordinators, Instructors</td>
<td>2005-06</td>
</tr>
<tr>
<td>Implement Recruitment Activities</td>
<td>Dean, Director-Counseling, Retention and Special Services, Recruitment Coordinators, Instructor</td>
<td>2006-07</td>
</tr>
<tr>
<td>Conduct Analysis of waiting List and review Administrative Rule TCS 10.07 (5m)</td>
<td>VP for Learning Innovations, Dean, Associate Dean, Co-Director-Human Resource Services, District Counsel and State Board Office staff</td>
<td>2006-07</td>
</tr>
<tr>
<td>Conduct Analysis of Enrollment in program</td>
<td>College Advancement, Co-Director-Human Resource Services, VP for Learning Innovations</td>
<td>2007-08 and Continuing</td>
</tr>
<tr>
<td>Continue, modify or discontinue targeted efforts to insure narrow tailoring.</td>
<td>VP for Learning Innovations, Dean, and Co-Director-Human Resource Services</td>
<td>2007-08</td>
</tr>
</tbody>
</table>
Method of Evaluation:

The statistical reports will be reviewed annually by the Co-Director-Human Resources in consultation with the VP for Learning Innovations and the Dean of the Service and Health Division. Appropriate involvement of Counseling, Retention and Special Services, Recruitment Coordinators and the instructional staff participating in recruitment activities will be assured. Where programs have had a positive effect on male enrollments they will be continued or modified as necessary. Where programs have been unsuccessful, they will be replaced with other types of efforts. If enrollments have come into minimal balance, programs will be evaluated for the need to continue on an on-going basis so as to institute narrow tailoring of the targeted activities.

Annual Progress (Give a report each year of the 5 year plan.)

2005-2006:

2006-2007:

2007-2008:

2008-2009:

2009-2010 Final Summary Report

Part B
Completion Rates

Completion/Graduation rates are used as a measure of student success. However, some question arises in using such data for a measure of success in a situation of technical education. Many students do not have a goal of completion of a one or two year program. Instead, goals often are to achieve more education or re-training which will enable the individual to achieve a job in a certain field or qualify them for advancement within their current occupation. As a result, the district will conduct a graduation rate analysis of those students who have declared a goal of achieving completion of a program. In addition, the district will attempt to develop, as part of this 5-year plan, alternative measurements of success and proper documentation and follow up to accurately measure that success.

<table>
<thead>
<tr>
<th>Activity/Steps</th>
<th>Persons Responsible for Implementation</th>
<th>Timetable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Conduct analysis by program of graduates compared to enrollees who have declared program completion as a goal</td>
<td>Director-College Advancement</td>
<td>2005-06</td>
</tr>
<tr>
<td>Design data collection system for students to declare enrollment intent as a goal</td>
<td>VP for Enrollment Management, Director-Enrollment Services, Registration, Director-College Advancement</td>
<td>2006-07</td>
</tr>
</tbody>
</table>
Conduct analysis of graduates and non-graduates to determine attainment of “success”

<table>
<thead>
<tr>
<th>Activity/Steps</th>
<th>Persons Responsible for Implementation</th>
<th>Timetable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Where data shows graduation or success measures do not meet declarations, develop programs for intervention or assistance to assure completion of declared goals</td>
<td>VP for Enrollment Management, Deans, Associate Deans, Director of Enrollment Management, Director-Counseling, Retention and Special Services, and Instructors</td>
<td>2008</td>
</tr>
<tr>
<td>Continue, modify or discontinue programs to assure narrow tailoring.</td>
<td>VP for Learning Innovations, Dean, and Co-Director-Human Resource Services</td>
<td>2008</td>
</tr>
</tbody>
</table>

**Part C**

**Student Counseling**

Waukesha County Technical College provides counseling and placement services to all students based upon voluntary student participation. Student records are not kept which identify the protected status of students participating in or requesting services for either counseling or placement services. Waukesha County Technical College does require employers to file a notice of non-discrimination in employment in order to be eligible for referrals of graduates to employment opportunities.

To assure non-discrimination in counseling, career services and job placement services two initiatives will take place during the 5-year plan period. First, the district will develop a data reporting system, which will enable the generation of statistics on use of the system by students. The system will be tied in with the basic student records system currently at the college. Thus, reports using protected status breakouts will be able to be produced. Percentages of those utilizing services will be analyzed against percentages of students in those protected categories. Second, counseling and placement services will make a special educational effort to outreach to protected category students to make them aware of the services provided by the college and encouraging them to utilize them to their benefit.

<table>
<thead>
<tr>
<th>Activity/Steps</th>
<th>Persons Responsible for Implementation</th>
<th>Timetable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Design data collection system to document students using counseling, career services or job placement services. The basic design could use student number so that reports could be generated from the basic student records system</td>
<td>VPs for Enrollment Management and Learning Innovations, Director-Counseling, Retention and Special Services, Manager-Cooperative Ed/Employee Opportunities Center</td>
<td>2006/07</td>
</tr>
<tr>
<td>Design reports showing usage of placement and counseling services by protected category students</td>
<td>VPs for Enrollment Management and Learning Innovations, Student Services, Director-Counseling, Retention and Special Services, Manager-Cooperative Ed/Employee Opportunities Center</td>
<td>2007/08</td>
</tr>
</tbody>
</table>
Conduct analysis of placement and counseling services to determine usage by protective category students comparable to availability in student body

<table>
<thead>
<tr>
<th>Activity/Steps</th>
<th>Persons Responsible for Implementation</th>
<th>Timetable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Conduct analysis of placement and counseling services to determine usage by protective category students comparable to availability in student body</td>
<td>College Advancement</td>
<td>2006-07</td>
</tr>
<tr>
<td>Confirm appropriate usage or design informational program targeted to protected category students covering availability and suggested usage of placement and counseling services</td>
<td>VPs for Enrollment Management and Learning Innovations, Deans, Director-Counseling Retention and Special Services, Director-College Advancement, Manager-Cooperative Ed/Employee Opportunities Center</td>
<td>2007</td>
</tr>
</tbody>
</table>

**Informational Initiative:**

<table>
<thead>
<tr>
<th>Activity/Steps</th>
<th>Persons Responsible for Implementation</th>
<th>Timetable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Confirm increased usage or re-design informational program targeted to protected category students.</td>
<td>VP-Enrollment Management, Co-Director-Human Resource Services</td>
<td>2007</td>
</tr>
</tbody>
</table>

**Method of Evaluation:**

The progress of the project and statistical reports developed will be reviewed annually by the Co-Director-Human Resources in consultation with the VP for Enrollment Management and the Managers of: Admissions, Enrollment and Recruitment; Enrollment Management; and Counseling, Retention and Special Services. Where percentages of those utilizing services compare favorably with availability percentages of protected category students, programs will be revised or discontinued to assure narrow tailoring.

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

2005-2006:

2006-2007:

2007-2008:

2008-2009:

2009-2010 Final Summary Report
EEOC Report Categories

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

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

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

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

5. **TECHNICAL/PARAPROFESSIONALS** - 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, and security personnel.

**Note:** Report non professional supervisors in executive, administrative and managerial category.
Appendix 2

2000 Persons with Disabilities Age 16-64 by WTCS District

Source: 2000 U.S. Census, Department of Workforce Development

Below is the Affirmative Action Data from the 2000 Census Information developed by the Department of Workforce Development, showing persons aged 16 to 64 with disabilities who were employed by district in 2000. Figures derived from WTCS 2000 County to District Conversion Factors.

<table>
<thead>
<tr>
<th>District</th>
<th>2000 Persons Age 16-64 with Disabilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chippewa Valley</td>
<td>10,029</td>
</tr>
<tr>
<td>Western Wisconsin</td>
<td>9,055</td>
</tr>
<tr>
<td>Southwest Wisconsin</td>
<td>4,972</td>
</tr>
<tr>
<td>Madison Area</td>
<td>22,437</td>
</tr>
<tr>
<td>Blackhawk</td>
<td>7,177</td>
</tr>
<tr>
<td>Gateway</td>
<td>16,375</td>
</tr>
<tr>
<td>Waukesha</td>
<td>10,818</td>
</tr>
<tr>
<td>Milwaukee</td>
<td>46,701</td>
</tr>
<tr>
<td>Moraine Park</td>
<td>9,168</td>
</tr>
<tr>
<td>Lakeshore</td>
<td>6,705</td>
</tr>
<tr>
<td>Fox Valley</td>
<td>13,700</td>
</tr>
<tr>
<td>Northeast</td>
<td>15,056</td>
</tr>
<tr>
<td>Mid-State</td>
<td>5,588</td>
</tr>
<tr>
<td>Lakeshore</td>
<td>8,356</td>
</tr>
<tr>
<td>Nicolet</td>
<td>4,828</td>
</tr>
<tr>
<td>Indianhead</td>
<td>11,769</td>
</tr>
<tr>
<td><strong>State Total</strong></td>
<td><strong>202,734</strong></td>
</tr>
</tbody>
</table>
## CIVIL RIGHTS COMPLIANCE PLAN FOR VOCATIONAL EDUCATION PROGRAMS

### Attachment 1: CIVIL RIGHTS COMPLIANCE PLAN FOR VOCATIONAL EDUCATION PROGRAMS

<table>
<thead>
<tr>
<th>NAME OF DISTRICT</th>
<th>DATE OF SUBMISSION</th>
</tr>
</thead>
<tbody>
<tr>
<td>NON-COMPLIANCE ITEM:</td>
<td></td>
</tr>
<tr>
<td>RECOMMENDATION(S):</td>
<td></td>
</tr>
<tr>
<td>OBJECTIVE(S):</td>
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</tbody>
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<tr>
<th>COMPLIANCE</th>
<th>NEEDS - TECHNICAL ASSISTANCE</th>
<th>MONITORING &amp; EVALUATION</th>
</tr>
</thead>
<tbody>
<tr>
<td>Activity/Steps</td>
<td>Beginning Timeline(s)</td>
<td>Person Responsible for Implementation</td>
</tr>
<tr>
<td>-------------</td>
<td>--------------------------</td>
<td>--------------------------</td>
</tr>
</tbody>
</table>

Attachment 1: CIVIL RIGHTS COMPLIANCE PLAN FOR VOCATIONAL EDUCATION PROGRAMS