Equal Employment
Opportunity and
Affirmative Action
Program

Western Iowa Tech Community College
Sioux City

August 9, 2021
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Western Iowa Tech Community College

Equal Employment Opportunity/Affirmative Action Program

Rationale and Intent

*Equal Employment Opportunity* - The legal necessity to maintain programs to insure fair and equitable treatment of all employees and applicants regardless of sex, race, age, creed, color, national origin, religion, marital status, sexual orientation, gender, gender identity, disability, or other protected class.

Western Iowa Tech Community College has established an equal employment opportunity/affirmative action program to reflect its moral, ethical, and legal commitment to equity in employment activities and in educational services. This plan serves as an assurance to students, employees, and to the larger community of WITCC’s efforts to comply with local, state, and federal regulations requiring equal employment opportunity, equal educational opportunity, and affirmative action.

*Affirmative Action* - The legal necessity to maintain a recruitment and employment program that will affect a change in staffing patterns; an attempt to eliminate employment discrimination based upon sex, race, age, creed, color, national origin, religion, marital status, sexual orientation, gender, gender identity, disability, or other protected class.

This program is also designed to support affirmative action practices that advance the representation and utilization of protected class members. It is not intended to be an end product, but rather an indication of an ongoing process toward accomplishing objectives and resolving conflict related to employment and educational equity within the College.
WESTERN IOWA TECH COMMUNITY COLLEGE

NONDISCRIMINATION STATEMENT

WITCC Board Policy 206.1
Nondiscrimination Policy

It is the policy of Western Iowa Tech Community College not to discriminate on the basis of race, creed, color, sex, national origin, religion, age, disability, sexual orientation, gender identity, socioeconomic status, actual or potential parent, family or marital status, or other characteristic protected by law in its programs, activities, or employment practices as required by state and federal civil rights regulation.

If you have questions or complaints, please reference Board Policies at www.witcc.edu/board or call (712) 274-6400 ext. 1406 and/or email Jackie.plendl@witcc.edu (employees) or call (712) 274-6400 ext. 1488 and/or email Juline.albert@witcc.edu (students) or the Director of the Office for Civil Rights, U.S. Department of Education, Citigroup Center, 500 W. Madison, Suite 1475, Chicago, IL 60661, phone number (312) 730-1560, fax (312) 730-1576.

Date of Adoption: 11/12/2019
Date of last revision: 11/12/2019
Date of current revision: 8/10/2020

Related Administrative Procedures and Cross References 400.5(h), 501.1, 502.4, 805.3, 806.1 302.1, 303.3, 400.17, 400.19, 400.2,

Legal Reference: (Code of Iowa)
It is the policy of the board to provide equal opportunities to all employees and to applicants for employment who meet the bona fide occupational qualifications established for the position for which they apply, while following the Non-Discrimination Board Policy (206.1). In keeping with the law, veteran status of applicants will be considered.

The President shall recommend, for Board approval, a designated Affirmative Action/Equal Employment Opportunity Officer (AA/EEO), who shall also serve as coordinator for Title IX, Title VI, Americans with Disabilities Act, and Section 504 compliance. All announcements, notices, etc., pertaining to these responsibilities shall include the designee's name, office address, phone number, and office hours.

Date of adoption: 7/14/75
Date of last revision: 01/08/18
Date of current revision: 11/11/19

Legal Reference: Civil Rights Act 1964; Title VI; Equal Pay Act as amended; Presidential Executive Order 11246, amended by E.O. 11375; Iowa Code Chapters 19B; 20; 35C; 73; 216; 260C; 279.8; Americans with Disabilities Act
ADMINISTRATION OF THE PROGRAM

The President, the Chief Human Resources Officer, and EEO/AA Officer, as well as all supervisors and employees, are charged with the responsibility for supporting and complying with equal employment opportunity/affirmative action principles.

Responsibility of the College President

The College President has ultimate responsibility for the administration of the EEO/AA program. The support for and commitment to equal opportunity in all facets of the College lies within the Office of the President. Under the direction of the College President, staff members assume specific responsibilities for maintaining procedures in compliance with all relevant federal and state equal employment opportunity/affirmative action legislation.

Responsibility of Administrative and Supervisory Personnel

All administrative and supervisory staff are familiar with equal employment opportunity/affirmative action guidelines, policies, and procedures as they affect employment activities within their departments. They exercise their supervisory responsibility to ensure that persons under their direction are treated in an equitable manner, while following the Nondiscrimination Board Policy 206.1. Administrative and supervisory staff assist with the College’s EEO/AA program throughout the recruitment and selection process, and in any other employment actions or recommendations involving College personnel. It is also the responsibility of administrative and supervisory staff to keep the EEO/AA Officer informed of any complaints or incidents of a discriminatory nature of which they become aware.
Responsibility of the Chief Human Resources Officer

The Chief Human Resources Officer is responsible for insuring compliance with legal mandates for equal employment opportunity/affirmative action that are applicable to the College personnel. Such responsibilities include the review and revision of employment practices and procedures to comply with current employment legislation and with the policies of the Board of Directors. The Chief Human Resources Officer maintains a system which monitors all recruitment, selection, and placement procedures to ensure that non-discriminatory practices are being exercised. The Officer gives fair and impartial consideration to all requests and recommendations for employment actions to be processed through that office.

Responsibility of the EEO/AA Officer

The EEO/AA Officer is responsible for the review, continued development, and coordination of the EEO/AA Program. The EEO/AA Officer provides assistance to administrative and supervisory personnel in the continuous effort to afford equal employment opportunity to all segments of the College community. The EEO/AA Officer assists in the identification of problem areas and monitors steps to alleviate inequitable conditions and situations as they might arise. The EEO/AA Officer serves as a liaison with external civil rights agencies and processes internal discrimination complaints in an effort to resolve them at the local EEO/AA program level. The EEO/AA Officer is involved in recruitment, selection, and other personnel activities in insure the equitable treatment of all applicants and employees.
**Responsibilities of the EEO/AA Advisory Committee**

The EEO/AA Advisory Committee may be composed of members representing all divisions and job classifications within the College. It will represent as many “underutilized” or “protected class” employees as possible. Members will be appointed by the College President. The Committee will meet bi-annually or more frequently as need dictates. Responsibilities of the Committee will include:

1. Periodic review of the College EEO/AA Plan and recommendations, additions, and/or revisions.
2. Alert the EEO/AA Officer of conditions or situations of concern.
3. Assist in maintaining communication with local organizations representing special populations and “protected classes” for purposes of recruiting students and qualified job applicants.
4. Assist in maintaining interest in and commitment to the EEO/AA program, both within the College and in the larger community.
PROGRAM GOALS AND ACTIVITIES

1. Provide EEO/AA information to supervisory and administrative personnel. **ACTION**: Provide appropriate training through the Staff Development program.

2. Provide EEO/AA information to students through the curriculum and activities. **ACTION**: The EEO/AA information will be included in the Student Handbook and in the College catalog. Also, activities will be planned each year which focus on awareness and information about diversity.

3. Review the Student Handbook and the EEO and the Harassment statements to give greater clarity of definition and the College procedures. **ACTION**: The EEO Advisory Committee will review and update the student procedures and information periodically.

4. Review the Employee Handbook and revise as stated above. **ACTION**: The Chief Human Resources Officer and staff will review and update the statements periodically.

5. Review the Harassment Board Policy and procedures with new employees. **ACTION**: The orientation process for new employees includes a review of the Employee Handbook by the Human Resources personnel.

6. Perform all record keeping functions such as job applicant data, and current work force data. **ACTION**: The EEO/AA Officer and Human Resources staff will continue to maintain appropriate data for program and Affirmative Action monitoring.

7. Provide EEO/AA information to College search committees. **ACTION**: A representative from Human Resources or the EEO/AA Officer will offer to attend organizational search committee meetings to review EEO issues and answer questions on appropriate procedures.
DISCRIMINATION AND HARASSMENT COMPLAINT PROCESS

All WITCC employees and students who feel they have been denied equal opportunity according to Nondiscrimination Board Policy 206.1 may seek remedy through an internal complaint process. This process also pertains to those who feel they have been the subjects of sexual harassment (see definition on page 15). The College assures that full cooperation will be provided to any individual filing a complaint with no threat of penalty or reprisal to the complainant. If the complaint involves alleged discriminatory or harassing behavior by the EEO/AA Officer, the Dean of Students should be contacted in lieu of the EEO/AA Officer wherever referenced in the following procedures.

COMPLAINT OR GRIEVANCE PROCEDURES (BOARD POLICY 400.11)

These procedures describe the methods by which a grievance or complaint may be filed. The nature of the grievance or complaint may be for reasons of:

- Discrimination in matters of College employment or admission to College programs or services;
- Harassment of any kind; or
- Employment, working conditions and other related matters.

NOTE: Grievances dealing with the provisions of a Collective Bargaining Master Agreement will be handled in accordance with that Agreement. Student grievances not having to do with discrimination or harassment will be handled in accordance with the Student Grievance Policy.

These procedures may be used for any of the above reasons by any of the following persons:

- Employees and/or applicants for employment;
- Students and/or prospective students; or
- Anyone who feels the College has discriminated against them or denied them an opportunity according to Nondiscrimination Board Policy 206.1 as amended from time to time or who feels they have been subjected to sexual or gender harassment.
Policy Statements
Fair, prompt, and impartial consideration of complaints involving claims of discrimination according to Nondiscrimination Board Policy 206.1 as amended from time to time, will be provided to students and employees without their having to fear reprisal or other action tending to affect discrimination. Full cooperation will be provided to an individual who files a complaint of discrimination.

It shall be the responsibility of the President to inform and educate employees or students and others involved with the College about harassment and the College's policy prohibiting harassment (from Board Policy 400.10 Harassment.)

Employees shall have the right to air a grievance or complaint when they feel a Board policy or an administrative rule has been violated or some action has infringed upon their rights or responsibilities. (Extracted from Board Policy 400.11, Grievance Procedure.)

Complaint Process
In matters of discrimination, the AA/EEO Officer has primary responsibility for advising the complainant of the process and the steps to follow.

In matters of harassment, the Harassment Conciliator first contacted regarding the incident has primary responsibility for advising the complainant of the process and the steps to follow. The Harassment Conciliators are named below.

In matters of employment, working conditions, and other related matters, the Chief Human Resources officer has primary responsibility for advising the complainant of the process and the steps to follow.

Informal Inquiry
The administration and Board of Directors of WITCC feel it is most desirable to have issues resolved at the lowest possible level. Individuals are encouraged to make informal inquiry to their immediate supervisor, instructor, or advisor as soon as possible following the event giving rise to the complaint. Employees of the College are expected to provide an atmosphere which is receptive to the free exchange of ideas and expressions of concern.

Formal Complaint Process
When resolution is not reached or is not practical through informal inquiry, the following steps may be taken:
The complainant may be asked to complete a written statement or a Complaint or Grievance Form. A copy of the Form is included with these Procedures. A written statement should include the date and location of the occurrence, party or parties involved, names of witnesses, the facts and/or rationale of the complaint, and the corrective action sought.

The complainant and charged party each have the right to have representatives present at any meetings. The complainant will suffer no retaliation. The right to confidentiality, both of the complainant and the accused, will be respected to the extent possible, but allowing for a full investigation.

Use of the College’s internal process in no way prevents or interferes with the complainant’s right to seek redress in other appropriate forums.

**Step 1**

**Discrimination Matters:** If informal inquiry does not satisfactorily resolve the situation within three (3) days of that discussion, or that method is not appropriate, the complainant should contact the EEO/AA Officer as soon as possible following the event or the informal inquiry.

**Harassment Matters:** Contact one of the Harassment Conciliators named below. If it is more comfortable for the complainant to discuss the situation with a different third party, such as a counselor, they may do so, and contact may then be made with one of the Harassment Conciliators, either by the complainant or the third party.

**Harassment Conciliators**

<table>
<thead>
<tr>
<th>Jackie Plendl</th>
<th>Juline Albert</th>
</tr>
</thead>
<tbody>
<tr>
<td>Human Resources &amp; EEO/AA Officer</td>
<td>Vice President of Learning</td>
</tr>
<tr>
<td>Kiser Building (A)</td>
<td>Kiser Building (A)</td>
</tr>
<tr>
<td>Administrative Offices</td>
<td>Administrative Offices</td>
</tr>
<tr>
<td>Extension 1406</td>
<td>Extension 1488</td>
</tr>
</tbody>
</table>

**Employment, Working Conditions, or Other Related Matters:** Contact the Chief Human Resources Officer as soon as possible following the event or the informal inquiry.

**Step 2**

**Discrimination Matters:** The complainant should present a written description of the discriminatory situation to one of the following levels:
- Division Chair, immediate supervisor, or instructor, as may be appropriate
- EEO/AA Officer
- Affirmative Action Advisory Committee
- College President
- Iowa Civil Rights Commission or another external agency

If the written concern is not resolved to the satisfaction of the employee or student within 20 working school days, the grievance may be processed to the next higher level. This process may be repeated in Step 3 and 4 with successively higher levels of authority.

The complainant may also file a complaint and seek remedy through other agencies such as the Sioux City Human Rights Commission, the Iowa Civil Rights Commission, the Federal Equal Employment Opportunity Commission, or other appropriate agencies.

Harassment Matters: The Harassment Conciliator will attempt to resolve the problem through interviews with the complainant, the charged party/parties, and witnesses, or others. The Conciliator may hold as many meetings as necessary to gather facts. However, the first such meeting shall be scheduled within five (5) working days of the date the complaint is first reported.

Employment, Working Conditions, or Other Related Matters: The grievance form should be completed by the complainant and forwarded to the appropriate administrator. The administrator should respond as soon as possible, but not later than five (5) days following receipt of the grievance.

Step 3

Discrimination Matters: Repeat Step 2 to the next higher level of authority.

Harassment Matters: After completing the investigation, the Harassment Conciliator will forward their findings to a Harassment Review Committee which will be appointed by the College President or their designee. The Committee will meet to review the findings within five (5) days of receiving the information and will forward the file and a recommendation of cause or no cause to the College President within the following five (5) days.

Employment, Working Conditions, or Other Related Matters: If the matter is still unresolved, the complainant should forward the grievance to the College President. This should be done within five (5) days of the administrator’s response, or within five (5) days of when the administrator should have responded. Within five (5) days of receiving the grievance, the College President should arrange to meet with the complainant and discuss the matter. The President shall then have up to 10 days to respond.

Step 4
Discrimination Matters: Repeat Step 2 to the next higher level of authority.

Harassment Matters: After reviewing the file and the Harassment Review Committee’s recommendation, the College President or designee may attempt to gather any more evidence necessary to decide the case and thereafter impose any sanctions deemed appropriate, including a recommendation to the Board of Directors for termination or expulsion.

Employment, Working Conditions, or Other Matters: If the matter is still unresolved, the grievant shall have up to 10 days following the College President’s response in which to request that the item be placed on the next Board of Director’s agenda.

When complaint or grievance matters are referred to the Board, the College President shall advise the complainant/grievant of the meeting date. Consideration by the Board shall be deemed the “hearing level” in these procedures, and their decision shall be final.

Other Information
Complaint or Grievance forms, when needed, may be obtained from the Chief Human Resources Officer, the Human Resources Office, or the EEO/AA Office, in the Dr. Robert H. Kiser Building, Room A242, and/or at (712) 274-6400 extension 1406.

“Days” shall mean working or College days, unless stated otherwise. Time periods may be extended upon mutual agreement of both parties. The Chief Human Resources Officer shall be advised of a complaint or grievance and shall monitor its progression or resolution.

If a party to a complaint or grievance occupies a position identified in these procedures as being responsible for receiving, hearing, or ruling on a complaint, the process shall bypass that step or level, and/or the College President shall name an alternate to fulfill the responsibility.

Failure of the complainant/grievant to proceed to the next step shall terminate the complaint/grievance. Failure of an administrator to respond in a timely manner shall permit the complainant/grievant to proceed to the next step or level.
WESTERN IOWA TECH COMMUNITY COLLEGE
COMPLAINT OR GRIEVANCE FORM

Name of Complainant/Grievant __________________________________________________________

Nature of Complaint/Grievance:
☐ Discrimination for Reasons of ______________________(race, creed, color, sex, religion
national origin, age, disability, sexual orientation, other)
☐ Harassment for Reasons of ______________________________________________________
☐ Other Employment Matters

Statement of incident(s) giving rise to the complaint/grievance (include dates, locations,
names, witnesses, facts or rationale):
____________________________________________________________________________________
____________________________________________________________________________________
____________________________________________________________________________________

Remedy sought: _________________________________________________________________
____________________________________________________________________________________

Informal Inquiry
Describe the informal discussion between you and your immediate supervisor, instructor
or advisor regarding the incident, if one was held (include name and date).
____________________________________________________________________________________
____________________________________________________________________________________

Signed _____________________________ Date ______________________________

Step 1
To:  ☐ EEO/AA Officer (For Discrimination Matters)
     ☐ Harassment Conciliator (For Harassment Matters)
     ☐ Chief Human Resources Officer (For Other Employment Matters)
Date Received ______ Disposition: _________________________________________________
____________________________________________________________________________________

Signed _____________________________ Date ______________________________
☐ Accept ☐ Reject ☐ Send to next level ____________________________________________
(Complainant Signature and Date)

Step 2
To: __________________________________________________________
Date Received ______ Disposition: _________________________________________________
____________________________________________________________________________________

Signed _____________________________ Date ______________________________
☐ Accept ☐ Reject ☐ Send to next level ____________________________________________
(Complainant Signature and Date)
Step 3

To: ____________________________________________

Date Received ______ Disposition: ______________________________________________________

Signed ______________________________________  Date ________________________________

□ Accept  □ Reject  □ Send to next level _____________________________________________

(Complainant Signature and Date)

Step 4

To: ____________________________________________

Date Received ______ Disposition: ______________________________________________________

Signed ______________________________________  Date ________________________________

□ Accept  □ Reject  ________________________________________________________________

(Complainant Signature and Date)

Instructions: Complaint should originate the form, retain a copy, and forward the original to the next step.

Person responsible for disposition at each step should complete his/her section of the original, retain a copy, and return the original to the complainant.

If any questions, consult with the person named in Step 1, who is responsible for assisting the complainant through the process.

Flow Chart for Process

<table>
<thead>
<tr>
<th>Step</th>
<th>Discrimination</th>
<th>Harassment</th>
<th>Other Employment Matters</th>
</tr>
</thead>
<tbody>
<tr>
<td>Informal Inquiry</td>
<td>ASAP after event.</td>
<td>ASAP after event.</td>
<td>ASAP after event.</td>
</tr>
<tr>
<td>Step 1</td>
<td>Contact appropriate person within 3 days of informal inquiry. Proceed to Step 2.</td>
<td>ASAP after informal inquiry.</td>
<td>ASAP after informal inquiry.</td>
</tr>
<tr>
<td>Step 2</td>
<td>Proceed to Step 3 if not resolved within 20 days.</td>
<td>Conciliator holds 1st meeting within 5 days.</td>
<td>Proceed to Step 3 if not resolved within 5 days.</td>
</tr>
<tr>
<td>Step 3</td>
<td>Proceed to Step 4 if not resolved within 20 days.</td>
<td>Review committee meets within 5 days of receiving conciliator’s report. Recommendation sent to College President.</td>
<td>Forward to College President within 5 days. College President responds within 10 days. Proceed to Step 4 after 10 days, or if still not resolved.</td>
</tr>
<tr>
<td>Step 4</td>
<td>College President’s decision and/or proceed to external agencies.</td>
<td>College President’s decision and/or proceed to external agencies.</td>
<td>Hearing scheduled with Board of Directors.</td>
</tr>
</tbody>
</table>

Note: Use of the College’s internal process in no way prevents or interferes with the complainant’s right to seek redress in other appropriate forums, at any time.
SEXUAL HARASSMENT AWARENESS

Harassment of WITCC employees and students will not be tolerated. This includes incidents within College facilities, on College premises, and on other property if the employee or student is at any College-sponsored or related activity or function, such as field trips where students are involved in a College-supervised activity or where the employee is engaged in College business.

Harassment includes, but is not limited to, race, creed, color, sex, national origin, religion, age, disability, sexual orientation, gender identity and sexual harassment. Harassment by board members, administrators, employees, students, parents, vendors, and others doing business with the College is prohibited. Employees whose behavior is alleged to be in violation of Board Policy 400.10 will be subject to the investigation procedure, which may result in discipline up to and including discharge or other appropriate action. Other individuals whose behavior is alleged to be in violation of this Policy will be subject to appropriate sanctions as determined and imposed by the President or Board.

Sexual or gender harassment shall include, but not be limited to, unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when:

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

Other types of harassment may include, but not be limited to, jokes, stories, pictures, or objects that are offensive, tend to alarm, annoy, abuse, or demean certain protected individuals and groups.

Complaints of sexual or gender harassment may be filed in accordance with the Complaint or Grievance Procedures outlined above.
EMPLOYMENT ACTIVITIES

All WITCC personnel who recruit, interview, select, and make recommendations for employment, and employment actions such as training, promotion, performance appraisal, reassignment, disciplinary action, or discharge are required to adhere to the College’s EEO/AA guidelines and polices of the Board of Directors.

Recruitment
WITCC demonstrates its commitment to affirmative action by practicing recruitment techniques designed to encourage employment applications and student enrollment applications from under-represented groups and by providing equal opportunity for all members of the College community. Applicants will not be discouraged from entering non-traditional areas.

Selection and Placement
No employee, prospective employee, student, or prospective student shall be discriminated against in the selection or placement process according to Nondiscrimination Board Policy 206.1. Employment decisions are based solely upon the qualifications of the individual applicant. The College has an open admission policy for students.

Transfer, Promotion and Reassignment
Employment actions involving transfer, promotion, and reassignment are based upon employee qualifications and the needs of the College, and in adherence to the policies established by the Board of Directors. External and internal position openings are publicized throughout the College and all qualified employees are given the opportunity to make application for them.
**Training and Development**
Supervisory personnel will inform and encourage employees to seek additional educational experience related to job improvement or personal and professional growth. Career counseling is available to all employees, and they are urged to participate in College sponsored training programs and other educational experiences.

**Compensation, Benefits and Working Conditions**
WITCC complies with all relevant state and federal legislation concerning the administration of wages, fringe benefits, working conditions, and other privileges associated with employment. Information regarding these conditions is continually compiled, updated, and reviewed and action taken to eliminate any inequities according to Nondiscrimination Board Policy 206.1.

**Disciplinary Action, Termination and Retrenchment**
In the event that disciplinary action, termination, or retrenchment become necessary, procedures for these actions do not differ on the basis of characteristics stated in Nondiscrimination Board Policy 206.1. Any such action or recommendation is reviewed by the Chief Human Resources Officer and the EEO/AA Officer. Alternatives to such action are explored and given consideration. Termination or disciplinary action is not used as punishment or harassment against any employee who has filed a complaint of discrimination against the College.
CONSENSUAL RELATIONSHIPS

The educational mission of the College is promoted by professionalism, which is fostered by an atmosphere of mutual trust and respect. These are diminished when persons in positions of authority abuse or appear to abuse their authority, as in the case of amorous relationships between faculty and students.

WITCC will view it as unethical if faculty members or administrators engage in amorous relationships with students enrolled in their classes or with staff who are subject to their supervision. WITCC will view it as unethical if WITCC security officers or other employees in positions of authority engage in amorous relationships with students or staff. The same is true even when the relationship appears to be consensual (i.e., both parties have consented) because the voluntary consent of the student or staff member is in doubt given the power imbalance in the relationship. When aware of such a situation, WITCC will attempt to reassign students and employees to classes or work areas that remove them from the power situation.

AMERICANS WITH DISABILITIES ACT OF 1990

Western Iowa Tech Community College does not discriminate against qualified individuals with disabilities. The College provides reasonable accommodation(s), as required by law, to otherwise qualified applicants, employees, and students with disabilities in all work settings, education programs, activities, services, and practices, including application procedures, admissions, course selection, the awarding of degrees, discipline, and dismissal. Educational, employment, or promotion opportunities will not be denied to an employee or students because of the need to make reasonable
accommodation(s) or modification(s) for the physical and mental impairment(s) of any such individual.

**Disability Accommodations for Employees**

Any employee of Western Iowa Tech Community College who has a disability for which an accommodation is needed should follow these procedures.

The employee will contact the Chief Human Resources Officer to schedule a meeting to review the employee’s accommodation application. The employee will supply medical documentation of the disability along with any supporting materials to the Chief Human Resources Officer who will evaluate the documentation to determine if a disability exists. If so, the implications and impact as it pertains to the job/position and the accommodation needs of the employee will be considered.

The Chief Human Resources Officer will function as the case manager for the employee to determine and implement a reasonable accommodation plan.
AFFIRMATIVE ACTION UTILIZATION

A comparative analysis of county demographics and current workforce and student demographics is included with this Plan.

The College will continually study the underutilization of protected groups and strive to achieve parity for protected groups under Title VII.

The EEO/AA Officer and the EEO/AA Advisory Committee recommend that the following areas be highlighted for recruitment efforts and protected class consideration:
- increase the representation of diverse employees at the College by developing recruitment strategies to attract diverse job applicants, and
- advertise positions to reach a more diverse target audience.
**Western Iowa Tech Community College**

**County Demographics**

<table>
<thead>
<tr>
<th></th>
<th>White Non-Hispanic</th>
<th>Black or African American</th>
<th>American Indian</th>
<th>Asian</th>
<th>Hispanic</th>
<th>Hawaiian/Pacific Islander</th>
<th>Two or More Races</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cherokee</td>
<td>10,746</td>
<td>269</td>
<td>50</td>
<td>77</td>
<td>147</td>
<td>-</td>
<td>-</td>
<td>11,468</td>
</tr>
<tr>
<td>%</td>
<td>93.7%</td>
<td>2.4%</td>
<td>0.4%</td>
<td>0.7%</td>
<td>1.3%</td>
<td>0.0%</td>
<td>1.6%</td>
<td></td>
</tr>
<tr>
<td>Crawford</td>
<td>11,393</td>
<td>428</td>
<td>39</td>
<td>338</td>
<td>4,763</td>
<td>29</td>
<td>137</td>
<td>17,132</td>
</tr>
<tr>
<td>%</td>
<td>66.5%</td>
<td>2.5%</td>
<td>0.2%</td>
<td>2.0%</td>
<td>27.8%</td>
<td>0.2%</td>
<td>0.8%</td>
<td></td>
</tr>
<tr>
<td>Ida</td>
<td>6,619</td>
<td>-</td>
<td>35</td>
<td>36</td>
<td>150</td>
<td>-</td>
<td>72</td>
<td>6,916</td>
</tr>
<tr>
<td>%</td>
<td>95.7%</td>
<td>0.0%</td>
<td>0.5%</td>
<td>0.5%</td>
<td>2.2%</td>
<td>0.0%</td>
<td>1.0%</td>
<td></td>
</tr>
<tr>
<td>Monona</td>
<td>8,347</td>
<td>24</td>
<td>179</td>
<td>-</td>
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</table>

Source: datausa.io profiles
for counties within the WITCC service area
# Western Iowa Tech Community College Employee Demographics

<table>
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<tr>
<th></th>
<th>Postsecondary Instruction</th>
<th>Management/Executive</th>
<th>Professional Support</th>
<th>Office and Admin Support</th>
<th>Service Maintenance</th>
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<th>PT</th>
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<td>9</td>
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<td>33</td>
<td>156</td>
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<td>3</td>
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<td>1</td>
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Source: IPEDS, HR 2021
# Western Iowa Tech Community College

## Student Demographics

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<th>White Non-Hispanic</th>
<th>Black or African American</th>
<th>American Indian</th>
<th>Asian</th>
<th>Hispanic</th>
<th>Hawaiian/Pacific Islander</th>
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<tr>
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<td>5%</td>
<td>7%</td>
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<tr>
<td>% change</td>
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<td>-7%</td>
<td>-3%</td>
<td>-23%</td>
<td>-23%</td>
<td>-29%</td>
<td>-56%</td>
<td>-59%</td>
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Source: Fall Enrollment Reports, 2019 & 2020, Institutional Research
### Western Iowa Tech Community College

#### Availability and Representation

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<th>WITCC %</th>
<th>Availability Number of females within a 100-mile radius</th>
<th>Expected %</th>
<th>Representation Gap</th>
<th>Number for Gender Balance</th>
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Source: EMSI, Occupation Overview in 48 counties within a 100-mile radius of Sioux City