

AFFIRMATIVE ACTION PLAN



2022-2024

IOWA WESTERN COMMUNITY COLLEGE

AFFIRMATIVE ACTION POLICY STATEMENT

The philosophy and intent of equal employment opportunity is to provide all individuals throughout our country the assurance that all employment decisions will be made without regard to race, color, creed, gender, sexual orientation, national origin, marital status, sex (including pregnancy), religion, age, disability, gender identity, genetic information, and, to the extent covered by law, veteran status, or any other characteristic that is legally protected under local, state or federal law. Iowa Western Community College supports this philosophy. As President of the College, I support the principles of Affirmative Action and Equal Employment Opportunity.

Iowa Western Community College and all its employees are committed to create environments that encourage each individual associated with IWCC to advance in his/her academic endeavors and careers based upon his/her abilities and skills and will not tolerate any type of discrimination based upon race, color, creed, gender, sexual orientation, national origin, marital status, sex (including pregnancy), religion, age, disability, gender identity, genetic information, and, to the extent covered by law, veteran status, or any other characteristic that is legally protected under local, state or federal law.

Iowa Western Community College is dedicated to establishing a work environment free from discrimination. Iowa Western Community College will take specific affirmative actions to ensure successful achievement of a non-discriminatory employment program. I have assigned the basic responsibility of ensuring that equal employment opportunity policies are adhered to and that affirmative actions are implemented to Iowa Western Community College's designated Director of Human Resources:

Mrs. Robyn Porter
Director of Human Resources
Iowa Western Community College
2700 College Road
Council Bluffs, IA 51503
(712) 325-3413



Dr. Dan Kinney
President, Iowa Western Community
College

I. INTRODUCTION

The philosophy and intent of equal employment opportunity is to provide all persons, regardless of race, color, creed, gender, sexual orientation, national origin, religion, age, disability, gender identity, genetic information, and veteran status equal access to positions, limited only by their ability to do the job. The philosophy and intent of affirmative action is to remedy past and present discrimination. Iowa Western Community College firmly believes in and supports these philosophies. The purpose of this Affirmative Action Plan is to assure that artificial, non-job-related barriers to employment are eliminated and that personnel activities in all aspects of employment shall be conducted in a manner to ensure fair and equitable treatment of all persons who participate in, or seek entrance to, the Iowa Western Community College workforce. In dedicating itself to establishing a work environment free from discrimination, the College shall take specific affirmative actions to ensure successful achievement of a nondiscriminatory employment program.

This Affirmative Action Plan was developed using both quantitative and qualitative analyses. Current College-wide personnel policies, procedures, and practices were reviewed. These analyses conducted by campus to determine if and where under-representation existed. Those comparisons were used to develop short- and long-term goals.

The Affirmative Action Plan shall require approval by the Board of Directors and shall be reviewed and updated on a biennial basis. The Director of Human Resources shall have the responsibility to oversee the plan, ensuring that equal employment opportunity policies and procedures are adhered to and that affirmative actions are appropriately and aggressively implemented. Achievement of the goals identified in the plan will be monitored by the Director of Human Resources.

The Affirmative Action plan is available upon request in the Human Resources office. All employees shall be responsible for being aware and supportive of the Affirmative Action Plan. Employees shall demonstrate sensitivity to and respect for all employees; shall demonstrate commitment to the College's Affirmative Action Policy in spirit as well as in actions; and shall be held accountable for compliance with all related College policies and procedures. Hiring authorities shall have an additional responsibility to make sure that progress is made towards achieving the goals of the Plan.

II. QUANTITATIVE ANALYSIS AND GOALS

Quantitative Analysis

The quantitative analysis compares the demographic composition of the IWCC workforce with the demographic composition of the relevant labor market (RLM) in order to determine if members of racial/ethnic minority groups, women, men, or persons with disabilities are underrepresented in the IWCC workforce.

Definitions

Relevant Labor Market (RLM). The geographic area IWCC typically uses to recruit applicants for an EEOC job category.

RLM Demographic Data. The number of persons, based on census data, within the RLM having the requisite skills for the job category. For the women/minorities analysis, we used census data specific to relevant recruitment area for each EEOC Job Category. The census data for persons with disabilities is state-wide and is not available by job category.

EEOC/Job Group Category. The job categories used by the Integrated Post-Secondary Data System (IPEDS)/Equal Employment Opportunity Commission (EEOC). There are seven categories:

- 1: Executive/Administrative/Managerial
- 2: Primary Instruction Faculty
- 3: Other Professionals (Support/Service)
- 4: Clerical and Secretarial
- 5: Technical and Paraprofessionals
- 6: Skilled Crafts
- 7: Service/Maintenance

Under-Representation. The Iowa Administrative Code defines "under-representation" to mean having fewer members of a racial/ethnic group, women, men, or persons with disabilities, in a particular job category than would be reasonably expected based on their availability in the relevant labor market." Several reports include the number of persons "underutilized" interchangeably with the number of individuals "underrepresented." In order for a category to require a goal, the underutilization/under-representation must be at least one, as IWCC cannot correct any imbalance of less than a whole person. For purposes of determining underutilization/under-representation, a fractional person will be considered a full person if the number is .50 or greater.

Format of Reports

As reflected in the subsections below, IWCC has chosen to prepare its analyses of gender and race separately from disability.

A. GENDER/RACE REPORTS

Organizational Profile

Iowa Western Community College has prepared a Workforce Analysis report to reflect the demographics within each department and campus. This data includes all employees on the IWCC payroll as of July 1, 2022.

1. The Workforce Analysis is a listing of each job title within each department or other similar organizational unit including departmental or unit supervision.
2. For each job title, the total number of male and female incumbents in each minority classification is given. All job titles, including all managerial job titles, are listed.

Workforce Annotations

Using federal affirmative action principles, an employee is included in the affirmative action report where their supervisor is located. IWCC has prepared a separate Organizational Profile Annotations report, which lists employees who are included in an affirmative action program for an establishment other than the one in which the employees are located, and identifies the actual location of such employees.

Determining Availability

Availability is an estimate of the number of qualified minorities or women available for employment in a given job group, expressed as a percentage of all qualified persons available for employment in the job group. The purpose of the availability determination is to establish a benchmark against which the demographic composition of our incumbent workforce can be compared in order to determine whether barriers to equal employment opportunity may exist within particular job groups.

Iowa Western Community College has separately determined the availability of women and minorities for each job group using the percentage of minorities or women with requisite skills in the reasonable recruitment area. The reasonable recruitment area is defined as the geographical area from which IWCC usually seeks or reasonably could seek workers to fill the positions in question. The most current available U.S. Census data is used to derive the availability of women and minorities. In this case, we used the 2014-2018 ACS Data.

Placement Goals (Comparing Incumbency to Availability)

Iowa Western Community College has compared the percentage of women and minorities in each job group with the availability for those job groups. When the percentage of minorities or women employed in a particular job group is less than would reasonably be expected given their availability percentage in that particular job group, a placement goal must be established.

Placement goals serve as objectives or targets reasonably attainable by means of applying every good faith effort to make all aspects of the entire affirmative action program work. Placement goals are also used to measure progress toward achieving equal employment opportunity. The establishment of a goal is neither a finding nor an admission of discrimination. Where a placement goal for a particular job group is established, a percentage goal is equal to the availability figure derived for women or minorities, as appropriate, for that job group.

IWCC will also take into consideration the following when establishing goals:

1. The numbers and percentages from the workforce analysis conducted pursuant to the Administrative Code in sub-rule 95.5(3);
2. The number of short- and long-term projected vacancies in the job category, considering turnover, layoffs, lateral transfers, new job openings, and retirements;
3. The availability of qualified or qualifiable persons from underrepresented racial/ethnic and gender categories within the relevant labor market;
4. The makeup of the student population served by racial/ethnic origin and gender;
5. The makeup of the population served by racial/ethnic origin and gender;
6. The makeup of the population of the metropolitan statistical area, when applicable, by racial/ethnic origin and gender.

In establishing placement goals, the following principles also apply:

1. Placement goals are neither rigid nor inflexible quotas, nor are they considered to be either a ceiling or a floor for the employment of particular groups.
2. All employment decisions are made in a nondiscriminatory manner. Placement goals are not used to extend a preference to any individual, to select an individual, or to adversely affect an individual's employment status on the basis of that person's race, color, religion, sex, sexual orientation, gender identity, or national origin.
3. Placement goals do not create set-asides for specific groups, nor are they intended to achieve proportional representation or equal results.

4. Placement goals are not used to supersede merit selection principles. Affirmative action programs prescribed by the regulations in this part do not require IWCC to hire a person who lacks qualifications to perform the job successfully, or hire a less qualified person in preference to a more qualified one.

B. DISABILITY REPORTS

Organizational Profile/Utilization Report/Quantitative Analysis (Disability)

Iowa Western Community College has combined its "Workforce Analysis" report showing the numerical and percentage breakdown of its employees with disabilities with its "Quantitative Analysis" comparing the workforce analysis figures with the availability of qualified persons with disabilities within the relevant labor market.

IWCC has chosen to disclose disability figures by campus, and by the entire organization, rather than by individual job groups. This data includes all employees on the IWCC payroll as of July 1, 2022.

Determining Availability

For its availability analysis of individuals with disabilities, IWCC has used information from "[Iowans with Disabilities: 2020](#)." As its benchmark for establishing goals, it uses 5.2%, which reflects the percentage of the labor force in 2019 who had a disability of some type.

Placement Goals (Comparing Incumbency to Availability)

Iowa Western Community College has compared the percentage of individuals with disabilities by campus and organization-wide. When the percentage of individuals with disabilities by campus or organization-wide is less than would reasonably be expected given their availability percentage, a placement goal is established. We note that we used the "Whole Person" rule here, as we did for race and gender.

IWCC will also take into consideration the following when establishing goals:

1. The numbers and percentages from the workforce analysis conducted pursuant to the Administrative Code in sub-rule 95.5(3);
2. The number of short- and long-term projected vacancies in the job category, considering turnover, layoffs, lateral transfers, new job openings, and retirements;
3. The availability of qualified or qualifiable persons from underrepresented disability categories within the relevant labor market;
4. The makeup of the student population served by disability;
5. The makeup of the population served by disability;

6. The makeup of the population of the metropolitan statistical area, when applicable, by disability.

As with its gender/race placement goals, the following principles also apply for disability goals:

1. Placement goals are neither rigid nor inflexible quotas, nor are they considered to be either a ceiling or a floor for the employment of particular groups.
2. All employment decisions are made in a nondiscriminatory manner. Placement goals are not used to extend a preference to any individual, to select an individual, or to adversely affect an individual's employment status on the basis of that person's protected class.
3. Placement goals do not create set-asides for specific groups, nor are they intended to achieve proportional representation or equal results.
4. Placement goals are not used to supersede merit selection principles. Affirmative action programs prescribed by the regulations in this part do not require IWCC to hire a person who lacks qualifications to perform the job successfully, or hire a less qualified person in preference to a more qualified one.

C. Quantitative Analysis Summary

As detailed on the aforementioned reports, the following campuses have under-representation in the following job groups. We again note that individuals are included in the campus where their supervisor is located.

To be clear, where a placement goal is required, the percentage goal listed below reflects the overall percentage of Minorities (or Hispanics or Females), for example, which make up the job group. In other words, a 21.9% goal for Minorities in Job Group 2 immediately below means that 21.9% of employees in that job group should be a minority. It does *not* mean that 21.9% of new hires must be a minority.

Organization-Wide

Job Group	Under-representation	Placement Goal
1: Executive/Administrative/Managerial	None	N/A
2: Primary Instruction	Minorities	21.9%
	Hispanics	6.1%
	Asians	8.3%
3: Other Professionals (Support/Service)	Minorities	18.6%
	Blacks	7.8%
4: Clerical and Secretarial	Minorities	14.9%
5: Technical and Paraprofessional	Females	30.9%
7: Service/Maintenance	None	N/A
Total Workforce (Disability Only)	Disabled	5.2%

Council Bluffs Campus

Job Group	Under-representation	Placement Goal
1: Executive/Administrative/Managerial	None	N/A
2: Primary Instruction	Minorities	21.9%
	Hispanics	6.1%
	Asians	8.3%
3: Other Professionals (Support/Service)	Minorities	18.5%
	Blacks	7.7%
4: Clerical and Secretarial	None	N/A
5: Technical and Paraprofessional	Females	30.3%
7: Service/Maintenance	None	N/A
Campus Total (Disability Only)	None	N/A

Cass County Center

Job Group	Under-representation	Placement Goal
4: Clerical and Secretarial	None	N/A
5: Technical and Paraprofessional	None	N/A
Campus Total (Disability Only)	None	N/A

Clarinda Correctional Facility

Job Group	Under-representation	Placement Goal
4: Clerical and Secretarial	None	N/A
Campus Total (Disability Only)	None	N/A

Clarinda Center

Job Group	Under-representation	Placement Goal
3: Other Professionals (Support/Service)	None	N/A
4: Clerical and Secretarial	None	N/A
Campus Total (Disability Only)	None	N/A

Des Moines Area

Job Group	Under-representation	Placement Goal
1: Executive/Administrative/Managerial	None	N/A
3: Other Professionals (Support/Service)	None	N/A
Campus Total (Disability Only)	None	N/A

Shelby County Center

Job Group	Under-representation	Placement Goal
3: Other Professionals (Support/Service)	None	N/A
4: Clerical and Secretarial	None	N/A
Campus Total (Disability Only)	None	N/A

D. Timetables

For job categories with under-representation, the total goal for the plan years FY22 and FY23 shall be the percentage stated on the applicable reports.

The time needed to reach these long term goals shall depend on the actual number of vacancies that occur within each group as well as labor market conditions. In occupational categories where the percentage of under-representation is high, it can be expected that the time needed to reach the long term goals shall be longer.

III. QUALITATIVE ANALYSIS

When under-representation is identified in one or more major job group, IWCC has prepared a qualitative analysis within its affirmative action plan. The qualitative analysis is a review of employment policies and practices to determine if and where its policies and practices tend to exclude, disadvantage, restrict or result in adverse impact on the basis of racial/ethnic origin, gender, or disability. This analysis may include, but is not limited to, the review of:

1. Recruitment practices and policies;
2. A demographic study of the applicant pool and flow;
3. The rate and composition of turnover in major job categories;
4. Trends in enrollment which will affect the size of the work force;
5. Application and application screening policies and practices;
6. Interview, selection, and placement policies and practices;
7. Transfer and promotion policies and practices;
8. Discipline, demotion, termination and reduction in force policies and practices;
9. Employee assistance, training selection and mentoring policies and practices;
10. The impact of the collective bargaining agreement on equal employment opportunity and the affirmative action process;
11. Law, policies or practices external to the agency that may hinder success in equal employment opportunity and affirmative action.

A. Recruitment

Standard procedures shall be followed in the recruitment of applicants for Regular employment. Recruitment activities may include, but are not limited to, the distribution of Employment Opportunity postings, the placement of employment advertisements in newspapers, other publications, and various national websites, and the announcement of vacancies on the IWCC website. Recruitment activities for Regular positions and employment advertising for all positions shall be coordinated by Human Resources. Advertisements shall include an "Equal Employment Opportunity/Affirmative Action Employer" (EEO/AA) clause. Generally, Regular vacancies shall be announced through Employment Opportunity postings. Postings shall include specific job related information such as job summary, essential functions, qualifications, salary and benefits. In addition, postings shall contain a nondiscrimination clause, application procedures, and general information about the College.

B. Hiring Process

A standardized hiring process is used by the College to assist and guide supervisors and screening committees through the employee selection process. The process attempts to ensure that screening criteria are job related and that all applicants for a specific vacancy are screened against identical criteria. Selection

recommendations and decisions shall be guided by the employee selection process, be made as objectively as possible, and meet the legal and philosophical tenets of equal employment opportunity and affirmative action. All full-time positions are to be posted for seven days externally on the IWCC jobs page and all third party job boards. An additional 24 hour veteran hold is used by Iowa Workforce Development to allow veteran's first access to posted positions. An applicant tracking system ensures consistency in posting of positions and tracks all EEO/AAP applicable demographics.

During the application review process, the qualifications of all applicants shall be screened against the position requirements and ratings documented for all applicants.

A structured interview process shall be used to ensure that all applicants are asked the same core questions. The questions shall be restricted to job-related information and free of illegal inquiries.

C. Promotion, Transfer, Demotion, Discharge, and Layoff

There is a formal promotion or transfer program. Current employees who wish to be considered for a posted vacancy must follow the same application process as external applicants, completing an application and submitting it prior to the posted deadline. Any position which meets the criteria of a promotion a/o 20% pay increase must be posted externally for 7 days to allow for maximum transparency in the community and allow others to apply.

Objective criteria such as performance evaluations shall be used in making demotion, discharge, or layoff decisions. For purposes of layoffs, employees with the best written evaluations and seniority shall be retained. Seniority shall be the deciding factor when evaluations are comparable. Determination of Faculty to be laid off shall be based upon competency as defined by their collective bargaining agreement. Seniority shall be the controlling factor in the layoff of faculty if performance is determined to be equal.

D. Working Conditions and Compensation

The Employee Handbook, Board Policy Manual, Administrative Policy Manual and Affirmative Action Plan shall be available to all employees.

Job descriptions shall be maintained for all full-time positions

Each Regular employee shall be evaluated by his/her supervisor as required by College procedure. The evaluation shall be documented on the appropriate College performance evaluation form. The employee shall be asked to sign the

completed evaluation form to indicate that the evaluation has been discussed. The completed evaluation shall be placed in the employee's personnel file.

Exit interviews and Stay interviews shall generally be held with all full-time employees. A summary of the interviews shall be reviewed by the Director of Human Resources and discussed with the appropriate supervisor a/o administrative staff as needed. Periodic summaries of these interviews will be shared with Cabinet.

E. Discrimination Complaint Procedure

The Discrimination Complaint Procedure establishes a process for registering complaints by employees, applicants, and students who believe the College policies and procedures on equal opportunity in employment and education have been violated, resulting in discriminatory treatment. This process is posted on all websites, job postings and the IWCC intranet.

F. Goals in Addressing Underrepresented Groups in Hiring Practices

- 1) Improve Human Resources departmental supports**
 - a) Train recruiting staff on DEI and AAP**
 - b) Hire a Talent Acquisition and Retention Manager**
 - c) Use data collected from HRIS and HRM systems to analyze areas of needed attention; develop action plans**
 - d) Shadow other colleges to determine best practices and find other resources**
- 2) Develop Selection Committees for all full-time vacancies**
- 3) Review job descriptions for inequities in KPI's**
- 4) Partner with inmate reentry programs**
- 5) Strengthen community outreach**
- 6) Improve the use of technology**
- 7) Partner with DEI Committee to ensure consistency and find potential resources**

DIVERSITY INITIATIVES AND PRACTICES

Initiatives and activities designed to enhance the College's Affirmative Action Plan

The Diversity, Equity and Inclusion (DE&I) Committee sponsors annual events for students, faculty, employees and community members addressing issues of race, gender, ethnicity, age, disability, religion, sexual orientation, and differences of thought, perspective, and experience.

Examples of Personnel Initiatives:

1. IWCC contracts with *CareerBuilder*. They provide a large number of avenues for disseminating job postings—many of which are targeted to various minority groups.
2. IWCC uses *PeopleAdmin* as our Applicant Tracking System. This platform has an automatic integration with HigherEd Jobs and Indeed, which have integrations with many job boards that target protected classes specifically.
3. The IWCC Exit Interview form asks the question, "Have you been or are you aware of anyone at IWCC who has been discriminated against on the basis of gender, race, national origin, creed, age, marital status, sexual orientation or disability?"
4. All positions at IWCC are posted to the Iowa Workforce Development job board, which integrates with local and national job boards targeting minorities and veterans.
5. IWCC has partnered with Home Base Iowa to assist in placing veterans into our open positions.
6. IWCC participates in various job fairs, including virtual job fairs targeting those with disabilities and veterans.

Additional examples of Diversity Initiatives and Practices:

1. Sponsor the DEI Committee comprised of employees and students
2. DEI Week
3. All employee in-service training with Dr. Marco Barker
4. DEI website page
5. Cultural sensitivity in the classroom training for faculty
6. Sponsor Black Student Union organization
7. Sponsor Pride Alliance organization
8. Campus Program Grant to support underserved student populations
9. MOU with Centro Latino to offer classes
10. Diversity training workshops
11. Special Needs Support Services
12. Juneteenth
13. LIFT Mentor Program through the Council Bluffs Chamber for women
14. Require Title IX training for students and employees from Get Inclusive

15. Require Sexual Harassment training for employees from Get Inclusive
16. Require Mandatory Reporter training for employees from the State of Iowa
17. Extensive ESL/Success Center
18. Women's History Month
19. International Student Employment
20. International Food Fests
21. Sign Language classes & interpreters for the deaf
22. Partner with Home Base Iowa
23. Iowa Veteran's Employers Coalition
24. Campus Veteran's Center
25. IWCC Coursework (i.e. Women's Literature, African American History, Race, Ethnic and Gender, Social Issues, Foreign Languages, Global Studies)
26. Black History Month
27. Job Placement Network
28. Offer free trades programs for underserved
29. Diversity Requirement for students receiving A.A. and A.S. degrees