



<b>Administrative Policy</b>	<b>7.2.1</b>
<b>Policy Title</b>	<b>Equal Employment Opportunity Program</b>
<b>Related Policy</b>	<b>Policy Governance Chapter II Section C Treatment of Staff</b>
<b>Correlated Administrative Policies</b>	<b>Policy 2.0 Non Discrimination</b>
<b>Adopted Date</b>	<b>07/05/87; modified 06/24/92; revised 12/17/09; revised 11/13/13</b>

I. Purpose

The purpose of the Equal Employment Opportunity program at the College is to help assure that all decisions and actions affecting employment will be made a non-discriminatory basis throughout the organization.

II. Policy Statement

It is the policy of the College to seek, employ and assign qualified personnel in all programs by nondiscriminatory means, and to assure non-discriminatory treatment throughout employment. Decisions and actions affecting employment and all other employment practices, including compensation, terms and conditions, and other privileges of employment, of the College are implemented with the purpose of securing, employees with the best skill, competencies, training, education, experience, and ability to perform the essential functions of employment without regard to protected characteristics.

III. Definitions

Protected Characteristic are those classes or characteristics defined by state or federal law, which include race, color, national origin, religion, sex, age, disability, genetic information, or military service or status.

IV. Procedures for the Equal Employment Opportunity Plan

A. Responsibility for Program Implementation

1. Executive Director of Human Resources. Duties may include, but are not limited to, the following:



- a. Developing policy statements(s), written Equal Employment Opportunity Plan and assuring compliance with, and continuation of same.
  - b. Developing a plan for monitoring and a system of accountability and reporting of program effectiveness.
  - c. Identifying problem areas and determining corrective action to be taken. Implementation of same.
  - d. Determining equitable goals to be accomplished for acquiring and maintaining minority and female representation at all levels of employment.
  - e. Primary responsibility for gathering and maintaining all records as deemed necessary for compliance with this Equal Employment Opportunity plan
  - f. Advising staff and serving as the office in which complaints are filed.
2. President. The President is responsible for helping to assure compliance with the Program and for communication of the program to the Board of Trustees.
  3. Other Key Administrative Personnel. As designated by the President, key administrative personnel will assist in implementation of policies and procedures at all levels and assist in the planning, monitoring, and auditing of the program as needed. Performance in carrying out equal employment opportunity and affirmative action policies will be evaluated as are other job responsibilities.

## B. Dissemination of Equal Employment Opportunity Policy

1. Internal Dissemination.
  - a. This document is available to College employees and discussed at management and supervisory meetings covering such subjects as recruitment, screening and hiring, training, and transfer of employees.



- b. College employees are kept informed of the Equal Employment Opportunity Program through college and campus publications and communications, divisional and departmental meetings, staff orientation programs, posters, etc.
  - c. Administrators, deans and other key personnel in a position to implement this Plan are advised of the Equal Employment Opportunity Policy and procedures of their responsibility to adhere to same.
  - d. During employee orientation, new employees are informed of the College's commitment to the principles of equal employment opportunity and of the establishment of this Plan.
  - e. The personnel policies, available to staff at all times, contain policies on recruiting and hiring, performance evaluation, disciplinary action, grievance procedures, promotional/transfer procedures, probationary periods, and termination of employment. Job descriptions for each job will be available in the Human Resources Office. Such policies will help to insure nondiscrimination in all decisions affecting employment.
2. External Dissemination.
- a. Copies of the complete program document are to be made available to the public upon request.
  - b. Purchase orders and subcontracts will contain the notation Equal Opportunity Employer notation "EOE"
  - c. Regular recruitment sources are informed of the College's equal employment opportunity policy and encouraged to actively recruit and make referrals of previously underutilized groups for all positions.
  - d. Colleges and universities with predominantly female or minority students may be contacted about the College's recruiting needs on a periodic basis. Other colleges are informed of the College's commitment to equal employment and encouraged to make referrals accordingly.
  - e. Advertisements for employment will contain the notation Equal Opportunity Employer notation "EOE".



### C. Utilization Analysis

1. Organizational Utilization Analysis of State and County Workforce/Population. (According to Available Data). Appendix A is a table that provides data on the population segments for the State of Wyoming, Fremont County and CWC employees by gender, ethnicity, and race based on data from the 2010 US. Census and CWC's employee data as of November, 2011. Appendix B is a utilization analysis comparison of the College's workforce with that of the State and the county. These statistics are offered for informational purposes only. The data does not constitute a goal, preference or quota of any sort for any aspect of CWC employment, nor does this data reflect any determination of how population segments should be represented among the CWC workforce. Every employment decision at CWC is made without regard to protected class.
2. Job Grouping Utilization Analysis. Each job is placed in one of the following Job Groups in order to compare demographic employment data to determine CWC's utilization of population segments. Appendix C contains the workforce segment utilization by Job Group. This Utilization Analysis is offered for informational purposes only, and does not constitute a goal, preference or quota of any sort for any aspect of CWC employment, nor does it reflect any determination of how population segments should be represented among the CWC workforce. Every employment decision at CWC is made without regard to protected class.
3. For purposes of these analyses the following race/ethnic categories are used:
  - a. White (not of Hispanic origin): All persons having origins in any of the original peoples of Europe, North Africa, or the Middle East.
  - b. Black (not or Hispanic origin): All persons having origins in any of the Black racial groups of Africa.
  - c. Hispanic: All persons of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race.



- d. Asian: All persons having origins in any of the original peoples of the Far East, Southeast Asia, the Indian Subcontinent, or the Pacific Islands. This area includes, for example, China, India, Japan, and Korea.
- e. Native Hawaiian/Pacific Islander: All persons having origins in any of the peoples of Hawaii, the Pacific Islands, and Samoa.
- f. American Indian or Alaskan Native: All persons having origins in any of the original peoples of North America, and who maintain cultural identification through tribal affiliation or community recognition.

D. Recruitment and Placement. The College actively seeks qualified applicants, from underutilized workforce population segments for all job categories and will make particular efforts to increase minority representation in those categories where a deficiency exists, consistent with the College policy of making all employment decisions without regard to protected class. Specifically, the following actions are taken:

1. The college, through its recruitment and employment policies and procedures, will recruit and employ the best qualified personnel available for all its diverse activities and will provide equal opportunities during employment.
2. Recruitment sources will be made aware of the college's policy and commitment to equal employment opportunity.
3. The college will display official equal employment opportunity signs at appropriate places.
4. The application forms for employment will meet federal and state guidelines regarding equal opportunity.
5. The college will develop and maintain records to demonstrate results toward equality of recruitment and placement activities.
6. Pre-employment tests administered by the college will be non-discriminatory.
7. Advertisements for personnel will identify Central Wyoming College as an equal opportunity employer.



8. Persons serving on employment screening committees are advised of and trained on hiring procedures.
  9. The College commits to advertising and recruiting from various local and regional sources, such as local community and general circulation newspapers, State of Wyoming Workforce Services, and other sources targeting the underemployed, women or minorities with the purpose of helping to ensuring a diverse applicant pool from which to hire the most qualified individuals.
- E. Career Development. To some extent, achievement of equitable distribution of minorities and women workforce segments throughout job classifications at the College as projected in Goals and Timetables may be the result of initial assignments, subsequent transfers, promotions, professional development and training. Congruent with its mission as an educational institution, the College strongly encourages staff to further their education and to pursue promotional or professional opportunities within the College.
1. The College offers tuition waivers for eligible employees to attend courses at either the College or the University of Wyoming.
  2. Employees are afforded opportunities to be involved in a continuous ongoing training program at the College and are also encouraged to be involved in job-related seminars.
  3. Selection of employees to participate in various training and educational programs shall be without regard to any protected class.
  4. Supervisors at all levels are responsible for identifying employees with advancement potential and to encourage such employees to participate in training programs in an effort to improve their employment status.
- F. Performance Evaluations. A system for performance evaluation has been established for employees of the College. Evaluations will be made by the immediate supervisor and will be conducted on the basis of job performance. Employees have an opportunity to also select colleagues to provide a supplemental evaluation to that of the supervisor. Performance evaluations are conducted on employees prior to the completion of the introductory period and then periodically (generally at least on an annual basis), thereafter, by the immediate supervisor in accordance with personnel practices. Performance evaluation results will be reviewed by the Human Resources Office to assure that the evaluations are being properly utilized. These evaluations will be available for review by the necessary parties.



- G. Compensation and Benefits. College compensation and benefit programs are administered on a non-discriminatory basis without regard to any protected class.
- H. Facilities. College facilities are used and maintained on a non-discriminatory basis and in accordance with CWC Administrative Policy 5.3 Use of College Facilities.
- I. Activities. Participation in college activities will comply with the non-discrimination and equal employment opportunity statement. Age restrictions may be imposed to ensure the safety of the participants in certain activities. Any employee-participant with a disability who is otherwise eligible to participate in a college activity may request assistance for participation by contacting the college's Executive Director of Human Resources.
- J. Community Relations. Central Wyoming College will continue its efforts to develop and expand appropriate relationships with governmental agencies, community groups, and other organizations which have equal employment opportunity objectives.
- K. Complaints or Concerns Regarding Discrimination and Requests for Reasonable Accommodations.
  - 1. Accommodations. The College will provide a reasonable accommodation upon request for otherwise qualified applicants or employees with a disability. Requests for accommodations should be first addressed with the employee's immediate supervisor and then to Human Resources. Applicants for employment are directed to address any request for a reasonable accommodation to Human Resources.
  - 2. Discrimination. Complaints or concerns regarding discrimination or compliance with this policy may be filed by an employee if the employee believes discriminatory action based on any protected class has occurred to any employee. Such a complaint or concern shall be directed to the Executive Director of Human Resources. The Executive Director of Human Resources or a designee will conduct an investigation of the concern, and reach a determination of whether this policy has been violated.
- L. Records and Reports



1. Records of applications and employment decisions shall be maintained in accordance with the law and are reviewed by appropriate administrative officers or the Executive Director of Human Resources to determine the effectiveness of the Equal Employment Opportunity Program.
2. If requested, Human Resources shall prepare and submit to the President an annual report of the Equal Employment Opportunity Program.
3. Human Resources will prepare and submit to inquiring governmental compliance agencies, as may be required, written reports outlining specific efforts and elements of progress resulting from implementation of the detailed program to assure equal employment opportunity.





APPENDIX A  
WORKFORCE DATA

	WY		Fremont Co.		FC Labor Force		CWC	
Total Population	563,626	100.00%	40,123	100.00%	19,094	100.00%	485	100.00%
Male	287,437	51.00%	20,030	49.92%	9,532	49.92%	260	53.61%
Female	276,189	49.00%	20,093	50.08%	9,562	50.08%	225	46.39%
Hispanic	50,231	8.91%	2,264	5.64%	1,077	5.64%	19	3.92%
Non-Hispanic	513,395	91.09%	37,859	94.36%	18,017	94.36%	466	96.08%
White	511,279	90.71%	29,813	74.30%	14,188	74.31%	266	54.85%
Black	4,748	0.84%	101	0.25%	48	0.25%	0	0.00%
Asian	4,426	0.79%	157	0.39%	75	0.39%	2	0.41%
American Indian/Alaskan Native	13,336	2.37%	8,498	21.18%	4,044	21.18%	19	3.92%
Native Hawaiian/Pacific Islander	427	0.08%	10	0.02%	5	0.03%	0	0.00%
Other/Two or More Races	29,410	5.22%	1,544	3.85%	735	3.85%	0	0.00%
Race/Ethnicity Unknown							179	36.91%



APPENDIX B  
UTILIZATION ANALYSIS

Population Segment	Utilization CWC v. State	Utilization CWC v. County
Male	2.61%	3.69%
Female	-2.61%	-3.69%
Hispanic	-4.99%	-1.73%
Non-Hispanic	4.99%	1.73%
White	-35.87%	-19.46%
Black	-0.84%	-0.25%
Asian	-0.37%	0.02%
American Indian/Alaskan Native	1.55%	-17.26%
Native Hawaiian/Pacific Islander	-0.08%	-0.02%
Other/Two or More Races	-5.22%	-3.85%

Based on the table above the College has a slight over representation of males and a slight underrepresentation of Hispanics in comparison to both state and county populations. It should be noted that given the number of individuals for which race/ethnicity are unknown (36.91%) it is difficult to assess overall utilization by race. One goal going forward is improve the data collection process to provide for more clarity in the race/ethnicity designations of those hired.



**APPENDIX C  
UTILIZATION ANALYSIS BY JOB GROUP**

	Men							
	Executive Administrative Managerial	Instructional	Other Professional (Service/Support)	Technical Paraprofessionals	Clerical Secretarial	Skilled Crafts	Service/Maintenance	Total
Non-resident Alien								0
Hispanic/Latino	1	3	1				4	9
American Indian or Alaska Native		5	2				3	10
Asian	1							1
Black or African American								0
Native Hawaiian or Other Pacific Islander								0
White	5	24	49	1	10	5	13	107
Two or More Races								0
Race and Ethnicity Unknown		133						133
<b>Total Men</b>	<b>7</b>	<b>165</b>	<b>52</b>	<b>1</b>	<b>10</b>	<b>5</b>	<b>20</b>	<b>260</b>
	Women							
	Executive Administrative Managerial	Instructional	Other Professional (Service/Support)	Technical Paraprofessionals	Clerical/Secretarial	Skilled Crafts	Service/Maintenance	Total
Non-resident Alien								0
Hispanic/Latino	2	6	2					10
American Indian or Alaska Native		3	4				2	9
Asian			1					1
Black or African American								0
Native Hawaiian or Other Pacific Islander								0
White	4	26	55	1	65		8	159
Two or More Races								0
Race and Ethnicity Unknown		45					1	46
<b>Total Women</b>	<b>6</b>	<b>80</b>	<b>62</b>	<b>1</b>	<b>65</b>	<b>0</b>	<b>11</b>	<b>225</b>
<b>Total Men &amp; Women</b>	<b>13</b>	<b>245</b>	<b>114</b>	<b>2</b>	<b>75</b>	<b>5</b>	<b>31</b>	<b>485</b>