
STATE OF MINNESOTA

INVER HILLS COMMUNITY COLLEGE

Affirmative Action Plan

August 2014 – August 2016

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Inver Grove Heights, MN 55076

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INVER HILLS COMMUNITY COLLEGE

2014 – 2016 Affirmative Action Plan

Table of Contents

I. EXECUTIVE SUMMARY4

II. STATEMENT OF COMMITMENT5

III. INDIVIDUALS RESPONSIBLE FOR DIRECTING/IMPLEMENTING THE AFFIRMATIVE ACTION PLAN6

 A. College President6

 B. Affirmative Action Officer or Designee6

 C. Americans with Disabilities Act Coordinator or Designee8

 D. Human Resources Director or Designee.....9

 E. Directors, Managers, and Supervisors10

 F. All Employees11

IV. COMMUNICATION OF THE AFFIRMATIVE ACTION PLAN12

 A. Internal Methods of Communication12

 B. External Methods of Communication13

V. MnSCU’S EQUAL OPPORTUNITY AND NONDISCRIMINATION IN EMPLOYMENT AND EDUCATION POLICY.....13

VI. MnSCU’S REPORT/COMPLAINT OF DISCRIMINATION/HARASSMENT INVESTIGATION AND RESOLUTION PROCEDURE17

VII. MNNSCU’S REASONABLE ACCOMMODATIONS IN EMPLOYMENT POLICY27

VIII. EVACUATION PROCEDURES FOR INDIVIDUALS WITH DISABILITIES31

IX. GOALS AND TIMETABLES33

X. AFFIRMATIVE ACTION PROGRAM OBJECTIVES36

XI. METHODS OF AUDITING, EVALUATING AND REPORTING PROGRAM SUCCESS40

 A. Pre-Employment Review Procedure/Monitoring the Hiring Process40

 B. Pre-Review Procedure for Layoff Decisions42

 C. Other Methods of Program Evaluation43

XII. RECRUITMENT PLAN43

 A. Advertising Sources44

 B. Recruitment for Individuals with Disabilities44

 C. Relationship Building and Outreach.....45

 D. Additional Recruitment Activities46

XIII. RETENTION PLAN46

 A. Individual Responsible for College’s Retention Program/Activities46

 B. Separation and Retention Analysis by Protected Groups47

 C. Methods of Retention of Protected Groups47

APPENDIX.....49

INVER HILLS COMMUNITY COLLEGE
AFFIRMATIVE ACTION PLAN 2014-2016

A. Complaint of Discrimination/Harassment Form.....49
B. Employee/Applicant Request for ADA Reasonable Accommodation Form49
C. Underutilization Analysis Worksheets57
D. Separation Analysis by Protected Groups Worksheets57

• **EXECUTIVE SUMMARY**

INVER HILLS COMMUNITY COLLEGE
 Affirmative Action Plan 2014-2016

Review revealed underutilization of the following protected group(s) in the following job categories:

Table 1. Underutilization Analysis of Protected Groups

Job Categories	PROTECTED GROUPS			
	Women	Racial/Ethnic Minorities	Indiv. With Disabilities	Veterans
Officials/Administrators		XX	XX	XX
Professionals	XX			XX
Faculty		XX		XX
Office/Clerical			XX	XX
Technicians	XX	XX		XX
Skilled Craft				
Service Maintenance	XX		XX	XX

Once approved, information about how to obtain or view a copy of this plan will be provided to every employee of Inver Hills Community College. Our intention is that every employee is aware of Inver Hills Community College’s commitments to affirmative action and equal employment opportunity. The plan will also be posted on the college’s website and maintained in the Human Resources Office.

This Affirmative Action Plan meets the requirements as set forth by Minnesota Management and Budget, and contains affirmative action goals and timetables, as well as reasonable and sufficiently assertive hiring and retention methods for achieving these goals.

 Affirmative Action Officer or Designee

 (date)

 Human Resources Director or Designee

 (date)

 College President

 (date)

• **STATEMENT OF COMMITMENT**

This statement reaffirms that Inver Hills Community College is committed to Minnesota's statewide affirmative action efforts and providing equal employment opportunity to all employees and applicants in accordance with equal opportunity and affirmative action laws.

I affirm my personal and official support of these policies which provide that:

- No individual shall be discriminated against in the terms and conditions of employment, personnel practices, or access to and participation in, programs, services, and activities with regard to race, sex, color, creed, religion, age, national origin, disability, marital status, familial status, status with regard to public assistance, sexual orientation, gender identity, gender expression, or membership or activity in a local human rights commission.
- This college is committed to the implementation of the affirmative action policies, programs, and procedures included in this plan to ensure that employment practices are free from discrimination. Employment practices include, but are not limited to the following: hiring, promotion, demotion, transfer, recruitment or recruitment advertising, layoff, disciplinary action, termination, rates of pay or other forms of compensation, benefits, leaves of absence, employee development, provision of a welcoming work environment, and selection for training including apprenticeship. We will provide reasonable accommodation to employees and applicants with disabilities.
- The college will continue to actively promote a program of affirmative action, wherever minorities, women, individuals with disabilities, and veterans are underrepresented in the workplace, and work to retain all qualified talented employees, including protected group employees. The college will strive to foster a work environment that values and honors diversity.
- This college will evaluate its efforts, including those of its directors, managers, and supervisors, in promoting equal opportunity and achieving affirmative action objectives contained herein. In addition, the college will expect all employees to perform their job duties in a manner that promotes equal opportunity for all.

It is the college's policy to provide an employment environment free of any form of discriminatory harassment as prohibited by federal, state, and local human rights laws. I strongly encourage suggestions as to how we may improve. We strive to provide equal employment opportunities and the best possible service to all Minnesotans.

College President

(date)

• **INDIVIDUALS RESPONSIBLE FOR DIRECTING/IMPLEMENTING THE
AFFIRMATIVE ACTION PLAN**

A. College President
(TIM WYNES, PRESIDENT)

Responsibilities:

The College President is responsible for the establishment of an Affirmative Action Plan that complies with all federal and state laws and regulations.

Duties:

The duties of the College President shall include, but are not limited to the following:

- Appoint the Affirmative Action Officer or designee and include accountability for the administration of the college's Affirmative Action Plan in his or her position description;
- Take action, if needed, on complaints of discrimination and harassment;
- Ensure the Affirmative Action Plan is effectively communicated to all employees on an annual basis;
- Make decisions and changes in policy, procedures, or accommodations as needed to facilitate effective affirmative action and equal employment opportunity;
- Actively promote equal opportunity employment; and
- Require all college directors, managers, and supervisors include responsibility statements for supporting affirmative action, equal opportunity, diversity, and/or cultural responsiveness in their position descriptions and annual objectives.

Accountability:

The College President is accountable directly to the Chancellor for the Minnesota State Colleges and Universities System and indirectly to the Minnesota Management and Budget Commissioner on matters pertaining to equal opportunity and affirmative action.

B. Affirmative Action Officer or Designee
(Nella Austin, Human Resources Assistant Director)

Responsibilities:

INVER HILLS COMMUNITY COLLEGE
AFFIRMATIVE ACTION PLAN 2014-2016

The Affirmative Action Officer is responsible for implementation of the college's affirmative action and equal opportunity program, and oversight of the college's compliance with equal opportunity and affirmative action laws.

Duties:

The duties of the Affirmative Action Officer or designee shall include, but are not limited to the following:

- Prepare and oversee the Affirmative Action Plan, including development and setting of college-wide goals;
- Monitor the compliance and fulfill all affirmative action reporting requirements;
- Inform the college's President of progress in affirmative action and equal opportunity and report potential concerns;
- Review the Affirmative Action Plan at least annually and provide updates as appropriate;
- Initiate and report on specific program objectives contained in the Affirmative Action Plan;
- Ensure that all administrators and supervisors are informed of the college's affirmative action goals and objectives and the fulfillment of affirmative action requirements by the college;
- Identify opportunities for infusing affirmative action and equal opportunity into the college's considerations, policies, and practices;
- Participate in and/or develop strategies to recruit individuals in protected groups for employment, promotion, and training opportunities;
- Notify directors, managers, and supervisors of existing disparities;
- Monitor affirmative action goal attainment in the search and selection process for all unlimited and seasonal classified and unclassified positions in accordance with established IHCC, MnSCU and MMB's guidelines and procedures for recruitment;
- Stay current on changes to equal opportunity and affirmative action laws and interpretation of the laws;
- Provide consultation, technical guidance, and/or training to directors, managers, supervisors, and staff regarding best practices in recruitment, selection, and

INVER HILLS COMMUNITY COLLEGE
AFFIRMATIVE ACTION PLAN 2014-2016

retention, progress on hiring goals, reasonable accommodations, and other opportunities for improvement; and

- Serve as the college liaison with Minnesota Management and Budget's Office of Equal Opportunity and Diversity and enforcement agencies.

Accountability:

The Affirmative Action Officer is accountable directly to the Human Resources Director and indirectly to the College President on matters pertaining to affirmative action and equal opportunity.

C. Americans with Disabilities Act Coordinator or Designee
(Nella Austin, Human Resources Assistant Director-for Title I-Employment)
(Kayla Swenson, Disability Services Coordinator-for Title II-Public Services)

Responsibilities:

The Americans with Disabilities Act Coordinator or designee is responsible for the oversight of the college's compliance with the Americans with Disabilities Act Title I – Employment and Title II – Public Services, in accordance with the Americans with Disabilities Act - as amended, the Minnesota Human Rights Act, and Executive Order 96-09.

Duties:

The duties of the Americans with Disabilities Act Coordinator shall include, but not limited to the following:

- Provide guidance, coordination, and direction to college management with regard to the Americans with Disabilities Act in the development and implementation of the college's policy, procedures, practices, and programs to ensure they are accessible and nondiscriminatory;
- Provide consultation, technical guidance, and/or training to directors, managers, supervisors, and staff regarding best practices in recruitment, selection, and retention of individuals with disabilities, provisions of reasonable accommodations for employees and applicants, and other opportunities for improvement; and
- Track and facilitate requests for reasonable accommodations for employees and applicants, as well as members of the public accessing the college's services, and reports reasonable accommodations annually to Minnesota Management and Budget.

Accountability:

The Americans with Disabilities Act Coordinator reports directly to the Human Resources Director.

D. Human Resources Director or Designee
(Suzie Brusoe, Human Resources Director)

Responsibilities:

The Human Resources Director is responsible for ensuring equitable and uniform administration of all personnel policies including taking action to remove barriers to equal employment opportunity with the college.

Duties:

The duties of the Human Resources Director include, but are not limited to the following:

- Provide leadership to human resources staff and others to ensure personnel decision-making processes adhere to equal opportunity and affirmative action principles;
- Provide a college-wide perspective on issues relating to affirmative action and equal opportunity and assist in the identification and development of effective solutions in problem areas related to affirmative action and equal opportunity;
- Serve as the college's primary resource for employees on EO laws, regulations, and procedures;
- Advise supervisors to ensure that personnel actions are consistent with EO laws and regulations;
- Review, investigate, and process complaints of discrimination including discriminatory harassment;
- Establish the recruitment and selection process for all classified and statutory unclassified positions at Inver Hills Community College, in accordance with Minnesota Statutes 43.18 and 179.74, MMB's Personnel Rules, and applicable collective bargaining agreements;
- Assist in recruitment and retention of individuals in protected groups;
- Oversee the development and utilization of selection criteria that is objective, uniform, and job-related;
- Ensure pre-hire review process is implemented and receives support from directors, managers, and supervisors;

INVER HILLS COMMUNITY COLLEGE
AFFIRMATIVE ACTION PLAN 2014-2016

- Include the Affirmative Action Officer in the decision-making process regarding personnel actions involving protected group members, including hiring, promotion, disciplinary actions, reallocation, transfer, termination, and department and division-wide classification studies;
- Oversee the inclusion of responsibility statements for supporting affirmative action, equal opportunity, diversity, and/or cultural responsiveness in position descriptions and annual objectives;
- Make available to the Affirmative Action Officer and Americans with Disabilities Act Coordinator or designee all necessary records and data necessary to perform duties related to equal opportunity and affirmative action.

Accountability:

The Human Resources Director is directly accountable to the President.

E. Directors, Managers, and Supervisors

Responsibilities:

Directors, Managers, and Supervisors are responsible for implementation of equal opportunity and affirmative action within their respective areas of supervision and compliance with the college's affirmative action programs and policies to ensure fair and equal treatment of all employees and applicants.

Duties:

The duties of directors, managers, and supervisors include, but are not limited to the following:

- Assist the Affirmative Action Officer in identifying and resolving problems and eliminating barriers which inhibit equal employment opportunity;
- Communicate the college's affirmative action policy to assigned staff;
- Carry out supervisory responsibilities in accordance with the equal employment opportunity and affirmative action policies embodied in this plan;
- Maintain a consistent standard within the workforce so that employees are evaluated, recognized, developed, and rewarded on a fair and equitable basis;
- Identify and help eliminate factors that may impede the college's pursuit of its equal employment opportunity/affirmative action goals and objectives;

INVER HILLS COMMUNITY COLLEGE
AFFIRMATIVE ACTION PLAN 2014-2016

- Include responsibility statements for supporting affirmative action, equal opportunity, diversity, and/or cultural responsiveness in staff position descriptions and annual objectives;
- Provide a positive and inclusive work environment; and
- Refer complaints of discrimination and harassment to the appropriate parties.

Accountability:

Directors, managers, and supervisors are accountable directly to their designated supervisor and indirectly to the college's President. Accountability for administrators and supervisors is shown in the college's organization chart. A copy of the college's organization chart is kept on the College's website at <http://www.inverhills.edu/About/pdfs/IHCCOrgChart.pdf>.

F. Diversity Council

The Diversity Council is a vital part of Inver Hills Community College. It provides cultural programming and international student advising and exists as a campus-wide resource on cultural diversity issues. The Council is chaired by the Director of Diversity and Equity and is comprised of a diverse representation of Inver Hills Community College employees.

- Develop and implement a campus-wide cultural diversity plan;
- Plan and sponsor various diversity events for students and employees;
- Administer IHCC Diversity Awards (individual and department awards);
- Review, update and make recommendations concerning equal employment opportunity/affirmative action programs, policies and procedures for the college;
- Provide assistance in developing and preparing the Affirmative Action Plan goals and annual program objective status reports;
- Identify and report problem areas and recommend needed corrective action; and
- Serve as a forum and channel for transmitting equal employment opportunity/affirmative action concerns to the college administration.

The Diversity Council is accountable to the President.

G. All Employees

Responsibilities:

All employees are responsible for conducting themselves in accordance with the college's equal opportunity and Affirmative Action Plan and policies.

INVER HILLS COMMUNITY COLLEGE
AFFIRMATIVE ACTION PLAN 2014-2016

Duties:

The duties of all employees shall include, but are not limited to the following:

- Exhibit an attitude of respect, courtesy, and cooperation towards fellow employees and the public; and
- Refrain from any actions that would adversely affect the performance of a coworker with respect to their race, sex, color, creed, religion, age, national origin, disability, marital status, familial status, status with regard to public assistance, sexual orientation, gender identity, gender expression, or membership or activity in a local human rights commission.

Accountability:

Employees are accountable to their designated supervisor and indirectly to the college's President.

• **COMMUNICATION OF THE AFFIRMATIVE ACTION PLAN**

The following information describes the methods that the college takes to communicate the Affirmative Action Plan to employees and the general public:

A. Internal Methods of Communication

- An email detailing the location of the Affirmative Action Plan and the responsibility to read, understand, support, and implement equal opportunity and affirmative action will be sent from the Affirmative Action Officer to all staff on an annual basis.
- The college's Affirmative Action Plan is available to all employees on the college's external website at <http://www.inverhills.edu/About/HR/> or in print copy to anyone who requests it. As requested, the college will make the plan available in alternative formats.
- Nondiscrimination and equal opportunity statements and posters are prominently displayed and available in areas frequented and accessible to employees.
- The Discrimination/Harassment Policy is summarized in the College Catalog.
- Orientation programs for new students include a definition of various forms of harassment and the college grievance procedure.

INVER HILLS COMMUNITY COLLEGE
AFFIRMATIVE ACTION PLAN 2014-2016

- A brochure outlining harassment/sexual violence is distributed to all new employees during orientation and is publicly displayed in racks and on bulletin boards throughout the college.
- All employees are apprised of the MnSCU Discrimination/Harassment Policy and Complaint Procedures through an official e-mail communication at the start of each regular academic year semester.
- Information on disability harassment is published in the College Catalog, which is also distributed to all new students during orientation.

B. External Methods of Communication

- The college's Affirmative Action Plan is available on the college's external website at <http://www.inverhills.edu/About/HR/> or in print copy to anyone who requests it. As requested, the college will make the plan available in alternative formats.
- The college's website homepage, letterhead, publications, all job postings, and employment forms and applications will include the statement "an equal opportunity employer and educator."
- External job announcements are distributed to organizations representing women, people of color, veterans, and persons with disabilities.
- Nondiscrimination and equal opportunity statements and posters are prominently displayed and available in areas frequented by and accessible to members of the public. Examples of posters displayed include: Equal Employment Opportunity is the law, Employee Rights Under the Fair Labor Standards Act, and the Americans with Disabilities Act Notice to the Public.

• **MnSCU'S EQUAL OPPORTUNITY AND NONDISCRIMINATION IN EMPLOYMENT AND EDUCATION POLICY**

To seek fair and just solutions to problems of discrimination/harassment, the MnSCU Board of Trustees has adopted Policy 1B.1 *Nondiscrimination in Employment and Education Opportunity* and Procedure 1B.1.1 *Report/Complaint of Discrimination/Harassment Investigation and Resolution*, which is used by Inver Hills Community College for investigating complaints of discrimination including harassment.

Complaints of discrimination and harassment should be directed to:

INVER HILLS COMMUNITY COLLEGE
AFFIRMATIVE ACTION PLAN 2014-2016

- Nella Austin, Affirmative Action Officer (for complaints of discrimination and harassment by employees).
Location: Liberal Arts Building-Room 217. Telephone 651-450-3672.
- Gina Sevick, Director of Community & Work Based Learning (for complaints involving only students).
Location: Library Building–Room 212. Telephone 651-450-3295.

Part 1. Policy Statement.

Subpart A. Equal opportunity for students and employees. Minnesota State Colleges and Universities has an enduring commitment to enhancing Minnesota’s quality of life by developing and fostering understanding and appreciation of a free and diverse society and providing equal opportunity for all its students and employees. To help effectuate these goals, Minnesota State Colleges and Universities is committed to a policy of equal opportunity and nondiscrimination in employment and education.

Subpart B. Nondiscrimination. No person shall be discriminated against in the terms and conditions of employment, personnel practices, or access to and participation in, programs, services, and activities with regard to race, sex, color, creed, religion, age, national origin, disability, marital status, status with regard to public assistance, sexual orientation, gender identity, or gender expression. In addition, discrimination in employment based on membership or activity in a local commission as defined by law is prohibited.

Harassment on the basis of race, sex, color, creed, religion, age, national origin, disability, marital status, status with regard to public assistance, sexual orientation, gender identity, or gender expression is prohibited. Harassment may occur in a variety of relationships, including faculty and student, supervisor and employee, student and student, staff and student, employee and employee, and other relationships with persons having business at, or visiting the educational or working environment.

This policy is directed at verbal or physical conduct that constitutes discrimination/harassment under state and federal law and is not directed at the content of speech. In cases in which verbal statements and other forms of expression are involved, Minnesota State Colleges and Universities will give due consideration to an individual's constitutionally protected right to free speech and academic freedom. However, discrimination and harassment are not within the protections of academic freedom or free speech.

The system office, colleges, and universities shall maintain and encourage full freedom, within the law, of expression, inquiry, teaching and research. Academic freedom comes with a responsibility that all members of our education community benefit from it without intimidation, exploitation or coercion.

INVER HILLS COMMUNITY COLLEGE
AFFIRMATIVE ACTION PLAN 2014-2016

This policy shall apply to all individuals affiliated with Minnesota State Colleges and Universities, including but not limited to its students, employees, applicants, volunteers, agents, and Board of Trustees, and is intended to protect the rights and privacy of both the complainant and respondent and other involved individuals, as well as to prevent retaliation or reprisal. Individuals who violate this policy shall be subject to disciplinary or other corrective action. This policy supersedes all existing system, college, and university equal opportunity and nondiscrimination policies.

Part 2. Definitions.

Subpart A. Consensual Relationship. Consensual relationship means a sexual or romantic relationship between two persons who voluntarily enter into such a relationship. Employees who are members of the same household should also refer to the Board Policy 4.10, of Trustees Nepotism policy 4.10.

Subpart B. Discrimination. Discrimination means conduct that is directed at an individual because of his or her protected class and that subjects the individual to different treatment by agents or employees so as to interfere with or limit the ability of the individual to participate in, or benefit from, the services, activities, or privileges provided by the system or colleges and universities or otherwise adversely affects the individual's employment or education.

Subpart C. Discriminatory harassment. Discriminatory harassment means verbal or physical conduct that is directed at an individual because of his or her protected class, and that is sufficiently severe, pervasive, or persistent so as to have the purpose or effect of creating a hostile work or educational environment.

As required by law, Minnesota State Colleges and Universities further defines sexual harassment as a form of sexual discrimination which is prohibited by state and federal law. Sexual harassment includes unwelcome sexual advances, requests for sexual favors, sexually motivated physical conduct, 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 or education, evaluation of a student's academic performance, or term or condition of participation in student activities or in other events or activities sanctioned by the college or university; or
- Submission to or rejection of such conduct by an individual is used as the basis for employment or academic decisions or other decisions about participation in student activities or other events or activities sanctioned by the college or university; or
- Such conduct has the purpose or effect of threatening an individual's employment; interfering with an individual's work or academic performance; or creating an intimidating, hostile, or offensive work or educational environment.

INVER HILLS COMMUNITY COLLEGE
AFFIRMATIVE ACTION PLAN 2014-2016

Subpart D. Employee. Employee means any individual employed by Minnesota State Colleges and Universities, including all faculty, staff, administrators, teaching assistants, graduate assistants, residence directors and student employees.

Subpart E. Protected class. For purposes of this policy:

- Protected class includes race, sex, color, creed, religion, age, national origin, disability, marital status, status with regard to public assistance, sexual orientation, gender identity, or gender expression. In addition, membership or activity in a local human rights commission is a protected class in employment.
- This policy prohibits use of protected class status as a factor in decisions affecting 96 education and employment where prohibited by federal or state law.

Subpart F. Retaliation. Retaliation includes, but is not limited to, intentionally engaging in any form of intimidation, reprisal or harassment against an individual because he or she:

- Made a complaint under this policy;
- Assisted or participated in any manner in an investigation, or process under this policy, regardless of whether a claim of discrimination or harassment is substantiated;
- Associated with a person or group of persons who are disabled or are of a different race, color, creed, religion, sexual orientation, gender identity, gender expression, or national origin; or
- Made a complaint or assisted or participated in any manner in an investigation or process with the Equal Employment Opportunity Commission, the U.S. Department of Education Office for Civil Rights, the Minnesota Department of Human Rights or other enforcement agencies, under any federal or stated nondiscrimination law, including the Civil Rights Act of 1964; Section 504 of the Rehabilitation Act of 1973; the Minnesota Human Rights Act, Minn. Stat. Ch. 363A, and their amendments.

Retaliation may occur whether or not there is a power or authority differential between the individuals involved.

Subpart G. Sexual harassment and violence as sexual abuse. Under certain circumstances, sexual harassment or violence may constitute sexual abuse according to Minnesota law. In such situations, the system office and colleges and universities shall comply with the reporting requirements in Minnesota Statutes Section 626.556 (reporting of maltreatment of minors) and Minnesota Statutes Section 626.557 (Vulnerable Adult Protection Act). Nothing in this policy will prohibit any college or university or the system office from taking immediate action to

INVER HILLS COMMUNITY COLLEGE
AFFIRMATIVE ACTION PLAN 2014-2016

protect victims of alleged sexual abuse. Board Policy 1B.3 Sexual Violence addresses sexual violence.

Subpart H. Student. For purposes of this policy, the term “student” includes all persons who:

- Are enrolled in one or more courses, either credit or non-credit, through a college or university;
- Withdraw, transfer or graduate, after an alleged violation of the student conduct code;
- Are not officially enrolled for a particular term but who have a continuing relationship with the college or university;
- Have been notified of their acceptance for admission or have initiated the process of application for admission or financial aid; or
- Are living in a college or university residence hall although not enrolled in, or employed by, the institution.

Part 3. Consensual Relationships. An employee of Minnesota State Colleges and Universities shall not enter into a consensual relationship with a student or an employee over whom he or she exercises direct or otherwise significant academic, administrative, supervisory, evaluative, counseling, or extracurricular authority or influence. In the event a relationship already exists, each college and university and system office shall develop a procedure to reassign evaluative authority as may be possible to avoid violations of this policy. This prohibition does not limit the right of an employee to make a recommendation on personnel matters concerning a family or household member where the right to make recommendations on such personnel matters is explicitly provided for in the applicable collective bargaining agreement or compensation plan.

Part 4. Retaliation. Retaliation as defined in this policy is prohibited in the system office, colleges and universities. Any individual subject to this policy who intentionally engages in retaliation shall be subject to disciplinary or other corrective action as appropriate.

Part 5. Policies and procedures. The chancellor shall establish procedures to implement this policy. The equal opportunity and nondiscrimination in employment and education policy and procedures of colleges and universities shall comply with Board Policy 1B.1 and Procedure 1B.1.1.

• **MnSCU’S REPORT/COMPLAINT OF DISCRIMINATION/HARASSMENT
INVESTIGATION AND RESOLUTION PROCEDURE**

Part 1. Purpose and applicability.

INVER HILLS COMMUNITY COLLEGE
AFFIRMATIVE ACTION PLAN 2014-2016

Subpart A. Purpose. This procedure is designed to further implement Minnesota State Colleges and Universities policies relating to nondiscrimination by providing a process through which individuals alleging violation of Board Policy 1B.1 Equal Opportunity and Nondiscrimination in Employment and Education may pursue a complaint. This includes allegations of retaliation, or discrimination or harassment based on sex, race, age, disability, color, creed, national origin, religion, sexual orientation, gender identity, gender expression, marital status, or status with regard to public assistance. In addition, discrimination in employment based on membership or activity in a local human rights commission as defined by law is prohibited.

Subpart B. Applicability. This procedure shall apply to all individuals affiliated with Minnesota State Colleges and Universities, including its students, employees, and applicants for employment, and is intended to protect the rights and privacy of both the complainant and respondent and other involved individuals, as well as to prevent retaliation/reprisal. Individuals who violate this procedure shall be subject to disciplinary or other corrective action.

A single act of discrimination or harassment may be based on more than one protected class status. For example, discrimination based on anti-Semitism may relate to religion, national origin, or both; discrimination against a pregnant woman might be based on sex, marital status, or both; discrimination against a transgender or transsexual individual might be based on sex or sexual orientation.

Not every act that may be offensive to an individual or group constitutes discrimination or harassment. Harassment includes action beyond the mere expression of views, words, symbols or thoughts that another individual finds offensive. To constitute a violation of Board Policy 1B.1, conduct must be considered sufficiently serious to deny or limit a student's or employee's ability to participate in or benefit from the services, activities, or privileges provided by Minnesota State Colleges and Universities.

Subpart C. Scope. This procedure is not applicable to allegations of sexual violence; allegations of sexual violence are handled pursuant to Board Policy 1B.3 Sexual Violence and System Procedure 1B.3.1. In addition, harassment and discrimination complaints not arising from alleged violations of Board Policy 1B.1, are to be addressed under other appropriate policies and established practices.

Part 2. Definitions. The definitions in Board Policy 1B.1 also apply to this procedure.

Subpart A. Designated officer. Designated officer means an individual designated by the president or chancellor to be primarily responsible for conducting an initial inquiry, determining whether to proceed with an investigation under this procedure, and investigating or coordinating the investigation of reports and complaints of discrimination/harassment in accordance with this procedure.

Prior to serving as the designated officer, the individual must complete investigator training provided by the system office.

INVER HILLS COMMUNITY COLLEGE
AFFIRMATIVE ACTION PLAN 2014-2016

Subpart B. Decisionmaker. Decisionmaker means a high level administrator designated by the president or chancellor to review investigative reports, to make findings whether Board Policy 1B.1 has been violated based upon the investigation, and to determine the appropriate action for the institution to take based upon the findings.

Prior to serving as a decisionmaker for complaints under this procedure, administrators must complete decisionmaker training provided by the system office.

Subpart C. Retaliation. Retaliation is as defined in Board Policy 1B.1 Equal Opportunity and Nondiscrimination in Employment and Education policy

Part 3. Consensual relationships. Board Policy 1B.1 Equal Opportunity and Nondiscrimination in Employment and Education prohibits consensual relationships between an employee and a student or another employee over whom he or she exercises direct or otherwise significant academic, administrative, supervisory, evaluative, counseling, or extracurricular authority or influence, whether or not both parties appear to have consented to the relationship, except as noted.

Examples of prohibited consensual relationships include, but are not limited to:

- An employee and a student if the employee is in a position to evaluate or otherwise significantly influence the student's education, employment, housing, participation in athletics, or any other college or university activity (employee includes, for example, graduate assistants, administrators, coaches, advisors, program directors, counselors and residence life staff);
- A faculty member and a student who is enrolled in the faculty member's course, who is an advisee of the faculty member, or whose academic work is supervised or evaluated by the faculty member; and
- A supervisor and an employee under the person's supervision.

A faculty member or other employee is prohibited from undertaking a romantic or sexual relationship or permitting one to develop with a student or supervisee who is enrolled in the person's class or is subject to that person's supervision or evaluation.

If a consensual, romantic or sexual relationship exists between an employee and another individual and subsequent events create a supervisor/supervisee, faculty/student or similar relationship between them, the person with evaluative or supervisory authority is required to report the relationship to his or her supervisor so that evaluative functions can be reassigned if possible.

INVER HILLS COMMUNITY COLLEGE
AFFIRMATIVE ACTION PLAN 2014-2016

This procedure does not cover consensual relationships between individuals that do not require one to exercise direct or otherwise significant academic, administrative, supervisory, evaluative, counseling, or extracurricular authority or influence over the other.

This prohibition does not limit the right of an employee to make a recommendation on personnel matters concerning a person with whom they have a consensual relationship where the right to make recommendations on such personnel matters is explicitly provided for in the applicable collective bargaining agreement or compensation plan.

Part 4. Reporting incidents of discrimination/harassment.

Subpart A. Reporting an incident. Any individual who believes she or he has been or is being subjected to conduct prohibited by Board Policy 1B.1 is encouraged to report the incident to the designated officer. The report/complaint should be brought as soon as possible after an incident occurs.

Any student, faculty member or employee who knows of, receives information about or receives a complaint of discrimination/harassment is strongly encouraged to report the information or complaint to the designated officer of the system office, college, or university.

Subpart B. Duty to report. Administrators and supervisors shall refer allegations of conduct that they reasonably believe may constitute discrimination or harassment under Board Policy 1B.1 to the designated officer, or in consultation with the designated officer may inquire into and resolve such matters.

Subpart C. Reports against a president. A report/complaint against a president of a college or university shall be filed with the system office. However, complaints against a president shall be processed by the college or university if the president's role in the alleged incident was limited to a decision on a recommendation made by another administrator, such as tenure, promotion or non-renewal, and the president had no other substantial involvement in the matter.

Subpart D. Reports against system office employees or Board of Trustees. For reports/complaints that involve allegations against system office employees, the responsibilities identified in this procedure as those of the president are the responsibilities of the chancellor. Reports/complaints that involve allegations against the chancellor or a member of the Board of Trustees shall be referred to the chair or vice chair of the Board for processing. Such reports/complaints may be assigned to appropriate system personnel or outside investigatory assistance may be designated.

Subpart E. False statements prohibited. Any individual who is determined to have provided false information in filing a discrimination report/complaint or during the investigation of such a report/complaint may be subject to disciplinary or corrective action.

INVER HILLS COMMUNITY COLLEGE
AFFIRMATIVE ACTION PLAN 2014-2016

Subpart F. Withdrawn complaints. If a complainant no longer desires to pursue a complaint, the system office, colleges, and universities reserve the right to investigate and take appropriate action.

Part 5. Right to representation. In accordance with federal law and applicable collective bargaining agreement and personnel plan language, represented employees may have the right to request and receive union representation during an investigatory meeting.

Nothing in this procedure is intended to expand, diminish or alter in any manner whatsoever any right or remedy available under a collective bargaining agreement, personnel plan or law. Any disciplinary action imposed as a result of an investigation conducted under this procedure will be processed in accordance with the applicable collective bargaining agreement or personnel plan.

Part 6. Investigation and Resolution. The system office, college or university has an affirmative duty to take timely and appropriate action to stop behavior prohibited by Board Policy 1B.1, conduct investigations and take appropriate action to prevent recurring misconduct.

Subpart A. Personal resolution. This procedure neither prevents nor requires the use of informal resolution by an individual who believes he or she has been subject to conduct in violation of Board Policy 1B.1. In such a situation, the individual should clearly explain to the alleged offender as soon as possible after the incident that the behavior is objectionable and must stop. If the behavior does not stop or if the individual believes retaliation may result from the discussion, the individual should report to the designated officer. Under no circumstance shall an individual be required to use personal resolution to address prohibited behaviors.

Subpart B. Information privacy. Confidentiality of information obtained during an investigation cannot be guaranteed; such information, however, will be handled in accordance with applicable federal and state data privacy laws.

Subpart C. Processing the complaint. The designated officer must be contacted in order to initiate a report/complaint under this procedure. The scope of the process used in each complaint/report shall be determined by the designated officer based on the complexity of the allegations, the number and relationship of individuals involved, and other pertinent factors.

- **Jurisdiction.** The designated officer shall determine whether the report/complaint is one which should be processed through another system office, college or university procedure available to the complainant; if appropriate, the designated officer shall direct the complainant to that procedure as soon as possible.
- **Conflicts.** The designated officer should identify to the president or chancellor/designee any real or perceived conflict of interest in proceeding as the designated officer for a specific complaint. If the president or chancellor/designee determines that a conflict exists, another designated officer shall be assigned.

INVER HILLS COMMUNITY COLLEGE
AFFIRMATIVE ACTION PLAN 2014-2016

- Information provided to complainant. At the time the report/complaint is made, the designated officer shall:
 - Inform the complainant of the provisions of the Board Policy 1B.1 and this procedure;
 - Provide a copy of or Web address for Board Policy 1B.1 and this procedure to the complainant;
 - Determine whether other individuals are permitted to accompany the complainant during investigatory interviews and the extent of their involvement; and
 - Inform the complainant of the provisions of Board Policy 1B.1 prohibiting retaliation.
- Complaint documentation. The designated officer shall insure that the complaint is documented in writing. The designated officer may request, but not require the complainant to document the complaint in writing using the complaint form of the system office, college or university.
- Information provided to the respondent. At the time initial contact is made with the respondent, the designated officer shall inform the respondent in writing of the existence and general nature of the complaint and the provisions of the nondiscrimination policy. At the initial meeting with the respondent, the designated officer shall:
 - Provide a copy of or Web address for Board Policy 1B.1 and this procedure to the respondent;
 - Provide sufficient information to the respondent consistent with federal and state data privacy laws to allow the respondent to respond to the substance of the complaint;
 - Explain to the respondent that in addition to being interviewed by the designated officer, the respondent may provide a written response to the allegations;
 - Determine whether other individuals are permitted to accompany the respondent during investigative interviews and the extent of their involvement; and

INVER HILLS COMMUNITY COLLEGE
AFFIRMATIVE ACTION PLAN 2014-2016

- Inform the respondent of the provisions of Board Policy 1B.1 prohibiting retaliation.
- Investigatory process. The designated officer shall:
 - Conduct a fact-finding inquiry or investigation into the complaint, including appropriate interviews and meetings;
 - Inform the witnesses and other involved individuals of the prohibition against retaliation;
 - Create, gather and maintain investigative documentation as appropriate;
 - Disclose appropriate information to others only on a need to know basis consistent with state and federal law, and provide a data privacy notice in accordance with state law; and
 - Handle all data in accordance with applicable federal and state privacy laws.
- Interim actions.
 - Employee reassignment or administrative leave. Under appropriate circumstances, the president or chancellor may, in consultation with system legal counsel and labor relations, reassign or place an employee on administrative leave at any point in time during the report/complaint process. In determining whether to place an employee on administrative leave or reassignment, consideration shall be given to the nature of the alleged behavior, the relationships between the parties, the context in which the alleged incidents occurred and other relevant factors. Any action taken must be consistent with the applicable collective bargaining agreement or personnel plan.
 - Student summary suspension or other action. Under appropriate circumstances, the president or designee may, in consultation with system legal counsel, summarily suspend a student at any point in time during the report/complaint process. A summary suspension may be imposed only in accordance with Board Policy 3.6 and associated system procedures. After the student has been summarily suspended, the report/complaint process should be completed within the shortest reasonable time period, not to exceed nine (9) class days. During the summary suspension, the student may not enter the campus or participate in any college or university activities without obtaining prior permission from the president or designee. Other temporary measures may be taken in lieu of summary suspension where the president or designee determines such measures are appropriate.

INVER HILLS COMMUNITY COLLEGE
AFFIRMATIVE ACTION PLAN 2014-2016

- No basis to proceed. At any point during the processing of the complaint, the designated officer may determine that there is no basis to proceed under Board Policy 1B.1. The designated officer shall refer the complaint as appropriate. The designated officer shall notify the complainant and respondent of the outcome as appropriate, in accordance with applicable data privacy laws.
- Timely Completion. Colleges, universities and the system office must provide resources sufficient to complete the investigative process and issue a written response within 60 days after a complaint is made, unless reasonable cause for delay exists. The designated officer shall notify the complainant and respondent if the written response is not expected to be issued within the 60 day period. The college, university or system office must meet any applicable shorter time periods, including those provided in the applicable collective bargaining agreement.

Subpart D. Resolution. After processing the complaint the designated officer may consider one or more of the following methods to resolve the complaint as appropriate:

- Conduct or coordinate education/training;
- Facilitate voluntary meetings between the parties;
- Recommend separation of the parties, after consultation with appropriate system office, college or university personnel;
- Other possible outcomes may include recommending changes in workplace assignments, enrollment in a different course or program, or other appropriate action;
- The system office, college or university may use alternative dispute resolution or mediation services as a method of resolving discrimination or harassment complaints. Alternative dispute resolution and mediation options require the voluntary participation of all parties to the complaint;
- Upon completion of the inquiry, the designated officer may dismiss or refer the complaint to others as appropriate.

Subpart E. Decision process. If the above methods have not resolved the complaint within a reasonable period of time to the satisfaction of the designated officer, or the designated officer feels additional steps should be taken, the procedures in this subpart shall be followed.

- **Designated officer.** The designated officer shall:
 - Prepare an investigation report and forward it to the decisionmaker for review and decision;

INVER HILLS COMMUNITY COLLEGE
AFFIRMATIVE ACTION PLAN 2014-2016

- Take additional investigative measures as requested by the decisionmaker; and
- Be responsible for coordinating responses to requests for information contained in an investigation report in accordance with the Minnesota Government Data Practices Act and other applicable law including, but not limited to the Family Educational Rights and Privacy Act (FERPA). In determining the appropriate response, the designated officer shall consult with the campus data practice compliance official and/or the Office of General Counsel.
- **Decision maker.** After receiving the investigation report prepared by the designated officer, the decisionmaker shall:
 - Determine whether additional steps should be taken prior to making the decision. Additional steps may include:
 - A request that the designated officer conduct further investigative measures;
 - A meeting with the complainant, respondent or other involved individuals. If a meeting involving a represented employee is convened, the complainant or respondent may choose to be accompanied by the bargaining unit representative, in accordance with the applicable collective bargaining agreement and federal and state law; and
 - A request for additional information which may include a written response from the complainant or respondent relating to the allegations of the complaint.
 - Take other measures deemed necessary to determine whether a violation of Board Policy 1B.1 has been established;
 - When making the decision, take into account the totality of the circumstances, including the nature and extent of the behaviors, the relationship(s) between the parties, the context in which the alleged incident(s) occurred, and other relevant factors;
 - Determine the nature, scope and timing of disciplinary or corrective action and the process for implementation if a violation of the nondiscrimination policy occurs. This may include consultation with human resources or supervisory personnel to determine appropriate discipline;
 - As appropriate, consistent with applicable state and federal data privacy laws, report in writing to the complainant, respondent and the designated officer her

INVER HILLS COMMUNITY COLLEGE
AFFIRMATIVE ACTION PLAN 2014-2016

or his findings, and the basis for those findings, as to whether Board policy 1B.1 has been violated; and

- Conduct that is determined not to have violated Board policy 1B.1 shall be referred to another procedure for further action, if appropriate.

Part 7. System office, college, or university action. The system office, college, or university shall take the appropriate corrective action based on results of the investigation, and the designated officer shall make appropriate inquiries to ascertain the effectiveness of any corrective or disciplinary action. Complainants are encouraged to report any subsequent conduct that violates Board Policy 1B1.1, as well as allegations of retaliation.

Written notice to parties relating to discipline, resolutions, and/or final dispositions resulting from the report/complaint process is deemed to be official correspondence from the system office, college or university. In accordance with state law, the system office, college or university is responsible for filing the complaint disposition concerning complaints against employees with the Commissioner of Employee Relations within 30 days of final disposition.

Part 8. Appeal.

Subpart A. Filing an appeal. The complainant or the respondent may appeal the decision of the decisionmaker. An appeal must be filed in writing with the president or designee within ten (10) business days after notification of the decision. The appeal must state specific reasons why the complainant or respondent believes the decision was improper. In a complaint against a president or other official who reports directly to the chancellor, an appeal may be considered by the chancellor whether or not the chancellor served as the decisionmaker.

Subpart B. Effect of review. For employees represented by a collective bargaining agreement, an appeal under this procedure is separate and distinct from, and is not in any way related to, any contractual protections or procedures. During the pendency of the appeal disciplinary or corrective action taken as a result of the decision shall be enforced. In addition, in cases involving sanctions of suspension for ten (10) days or longer, students shall be informed of their right to a contested case hearing under Minnesota Statutes §14.

Subpart C. Appeal process. The president or designee shall review the record and determine whether to affirm or modify the decision. The president or designee may receive additional information if the president or designee believes such information would aid in the consideration of the appeal. The decision on appeal shall be made within a reasonable time and the complainant, respondent and designated officer shall be notified in writing of the decision, consistent with applicable state and federal data privacy laws. The decision on appeal exhausts the complainant's and respondent's administrative remedies under this procedure except as provided herein.

INVER HILLS COMMUNITY COLLEGE
AFFIRMATIVE ACTION PLAN 2014-2016

Part 9. Education and training. The system office, colleges and universities shall provide education and training programs to promote awareness and prevent discrimination/harassment, such as educational seminars, peer-to-peer counseling, operation of hotlines, self-defense courses, and informational resources. Education and training programs should include education about Board Policy 1B.1 and this procedure. All colleges and universities and the system office shall promote awareness of Board Policy 1B.1 and this procedure, and shall publicly identify the designated officer.

Part 10. Distribution of board policy 1B.1 and this procedure. Information regarding Board Policy 1B.1 and this procedure shall, at a minimum, be distributed to students at the time of registration and to employees at the beginning of employment. Distribution may be accomplished by posting on an internet website, provided all students and employees are directly notified of how to access the policy and procedure by an exact address, and that they may request a paper copy. Copies of the policy and procedure shall be conspicuously posted at appropriate locations at the system office and on college and university campuses at all times and shall include the designated officers' names, locations and telephone numbers.

Designated officers also must be identified by name, location and phone number in informational publications such as student catalogs, student and employee handbooks, bulletin boards, campus websites and other appropriate public announcements.

Part 11. Maintenance of report/complaint procedure documentation. During and upon the completion of the complaint process, the complaint file shall be maintained in a secure location in the office of the designated officer for the system office, college or university in accordance with the applicable records retention schedule. Access to the data shall be in accordance with the respective collective bargaining agreement or personnel plan, the Minnesota Government Data Practices Act, the Family Educational Rights and Privacy Act or other applicable law.

• **MNSCU'S REASONABLE ACCOMMODATIONS IN EMPLOYMENT POLICY**

Inver Hills Community College is committed to the fair and equal employment of people with disabilities. Reasonable accommodation is a key to this non-discrimination policy. It is the policy of the college to reasonably accommodate qualified individuals with disabilities unless the accommodation would impose an undue hardship.

Inver Hills Community College follows the MnSCU System Policy 1B.4, *Access and Accommodation for Individuals with Disabilities* and Procedure 1B.0.1, *Reasonable Accommodations in Employment Procedure listed below.*

Employees and job applicants requesting reasonable accommodations will make their requests to Nella Austin, Americans with Disabilities Act Coordinator at (651) 450-3672. Students requesting reasonable accommodations will make their requests to Kayla Swenson, Disability

INVER HILLS COMMUNITY COLLEGE
AFFIRMATIVE ACTION PLAN 2014-2016

Services Coordinator at (651) 450-3508 or kswenso@inverhills.edu. The Minnesota Relay Service number is 1-800-627-3529.

Part 1. Purpose. This procedure sets forth the process to be used for responding to requests for reasonable accommodations in employment based on an applicant's or employee's disability. The scope of this procedure is limited to reasonable accommodations, and is not intended to fully describe other provisions of the Americans with Disabilities Act or the Minnesota Human Rights Act.

Part 2. Reasonable Accommodations in Employment. It is the policy of MnSCU to encourage the employment and promotion of any qualified individual including qualified individuals with disabilities. The system office, college or university will not discriminate in providing reasonable accommodations to qualified individuals with a disability in regard to job application procedures, hiring, advancement, discharge, employee compensation, job training or other terms, conditions, and privileges of employment.

Part 3. Definitions. For purposes of this procedure, the following terms have the meaning given them:

Subpart A. Employer. The employer is the system office, college or university.

Subpart B. Essential Functions. Essential functions are the fundamental job duties of the position in question. The term does not include the marginal functions of the position.

- A job function may be considered essential for any of several reasons, including but not limited to the following:
 - The function may be essential because the reason the position exists is to perform that function;
 - The function may be essential because of the limited number of employees available among whom the performance of that job function can be distributed; and/or
 - The function may be highly specialized so that the incumbent in the position is hired for his or her expertise or ability to perform the particular function.
- Evidence of whether a particular function is essential includes, but is not limited to:
 - The employer's judgment as to which functions are essential;
 - Written job descriptions;

INVER HILLS COMMUNITY COLLEGE
AFFIRMATIVE ACTION PLAN 2014-2016

- The amount of time spent on the job performing the function;
- The consequences of not requiring the incumbent to perform the function;
- The terms of a collective bargaining agreement;
- The work experience of past incumbents in the job; and/or
- The current work experience of incumbents in similar jobs.

Subpart C. Individual with a Disability. An individual with a disability for the purposes of determining reasonable accommodations is any applicant, current employee, including student employees, or employees seeking promotion, who has a physical or mental impairment which substantially or materially limits one or more of such individual's major life activities. Generally, a disabling physical or mental condition which is expected to be temporary and from which the individual is expected to recover is not a disability under this procedure.

Subpart D. Qualified Individual with a Disability. A qualified individual with a disability is an individual with a disability who meets the requisite skill, education, experience and other job-related requirements of the job and who, with or without reasonable accommodation, can perform the essential functions of the job.

Subpart E. Reasonable Accommodations. A reasonable accommodation is a modification or adjustment to a job or employment practice or the work environment that enables a qualified individual with a disability to perform the essential functions of the job as identified at the time of the reasonable accommodation request and to access equal employment opportunities. Reasonable accommodations may also include those things which make a facility and its operations readily accessible to and usable by individuals with disabilities. Under the law, the employer has a responsibility to make reasonable accommodations for individuals with a disability only if the disability is known and it is not an undue hardship under Part 6, Subpart C.

Part 4. Identification of Assigned Staff Member. The system office, and each college and university shall assign and identify a staff member responsible for administering requests for reasonable accommodations.

Part 5. Right to Representation. In accordance with applicable collective bargaining agreement language, employees may have the right to request and receive union representation during the reasonable accommodations process.

Part 6. Providing Reasonable Accommodations.

Subpart A. Job Relatedness. Reasonable accommodations will be provided only for job-related needs of individuals with a disability. The primary factor in evaluating an accommodation's job relatedness is whether the accommodation specifically assists the individual to perform the essential functions of the job as identified at the time of the reasonable accommodation

INVER HILLS COMMUNITY COLLEGE
AFFIRMATIVE ACTION PLAN 2014-2016

request. If the requested accommodation is primarily for the benefit of the individual with a disability to assist that individual in daily personal activities, the employer is not required to provide the accommodation. The appropriate reasonable accommodation is best determined through a flexible, interactive process that involves both the employer and the qualified individual with a disability; it may include the appropriate union representative as provided by the applicable collective bargaining agreement.

Subpart B. Essential Functions. The system office, college or university may deny employment or advancement in employment based on the inability of an individual with a disability to perform the essential functions of the job and may decline to make accommodations to the physical or mental needs of an employee or job applicant with a disability if:

- The accommodation would impose an undue hardship on the system office, college or university as provided under Subpart C.;
- The individual with a disability, with or without reasonable accommodations, is not qualified to perform the essential functions of that particular job; or
- Having the individual in the job would create a direct threat because of a significant risk to the health and safety of the individual or others and the risk cannot be eliminated by reasonable accommodation.

Subpart C. Undue Hardship. In determining whether providing a reasonable accommodation would impose an undue hardship on the employer, the factors to be considered include:

- The nature and net cost of the accommodation needed;
- The overall financial resources of the employer involved in the provision of the reasonable accommodation, the number of persons employed, and the effect on expenses and resources;
- The overall financial resources of the employer, the overall size of the business of the employer with respect to the number of its employees, and the number, type and location of its facilities;
- The type of operation or operations of the employer, including the composition, structure and functions of the workforce, and the geographic separateness and administrative or fiscal relationship of the employer in question to the covered entity; and
- The impact of the accommodation upon the operation of the employer, including the impact on the ability of other employees to perform their duties and the impact on the employer's ability to conduct business.

INVER HILLS COMMUNITY COLLEGE
AFFIRMATIVE ACTION PLAN 2014-2016

Subpart D. Documentation. Documentation of a disability is required as part of the reasonable accommodation process unless the nature and extent of the disability is already known to the employer, or as a practical matter, the requested accommodation is minimal and the employer makes modifications for its convenience, regardless of whether the employee or applicant meets the requirements for a reasonable accommodation under this procedure.

Subpart E. Choice of Accommodations. The employer is not required to provide the specific accommodation requested by the individual and may choose an effective accommodation which is less expensive or easier to provide. Accommodations provided to the individual are the financial responsibility of the employer.

Subpart F. Request Process. The system office, colleges and universities are responsible for establishing a process for individuals with disabilities to make requests for reasonable accommodations in compliance with the Americans with Disabilities Act or the Minnesota Human Rights Act. Such process should include the following:

- MnSCU policy statement and definitions;
- Assignment and identification of a staff member responsible for administering requests for reasonable accommodations;
- Provide a process for appealing a reasonable accommodations decision.

Part 7. Application. Nothing in this procedure is intended to expand, diminish or alter the provisions of the Americans with Disabilities Act or the Minnesota Human Rights Act.

VIII. EVACUATION PROCEDURES FOR INDIVIDUALS WITH DISABILITIES

A copy of the college's weather and emergency evacuation plans can be found at:
<http://www.inverhills.edu/StudentResources/pdfs/2013SecurityReport.pdf>

Knowledge and preparation by both individuals needing assistance and those who don't is key to reducing the impact of emergencies. When developing a plan, safety needs should be determined on a case-by-case basis because it varies with each individual and building.

Everyone has a responsibility to develop their own personal emergency evacuation plans, this includes individuals with disabilities or individuals who will need assistance during evacuation. The Director of Safety and Security will work to develop a plan and consult the appropriate building and safety personnel. The Director of Safety and Security will work with instructors and supervisors to develop evacuation plans for students and employees with disabilities.

Directors, managers, and supervisors should review the emergency evacuation procedures with staff, including informing all staff that if additional assistance may be needed, and individuals

INVER HILLS COMMUNITY COLLEGE
AFFIRMATIVE ACTION PLAN 2014-2016

with disabilities should contact the college contact(s) below to request the type of assistance they may need:

IHCC Campus Security: (651) 450-3711

Director of Safety and Security, Thomas McCluney: (651) 450-3528;

T.McCluney@inverhills.edu

IHCC Administration: (651) 450-2525

Inver Grove Heights Police Dispatch: (651) 322-2323

Inver Hills Community College works closely with the Inver Grove Heights Police Department. The Director of Safety and Security is in contact daily with officials from the department and shares information regularly.

Evacuation Options:

Individuals with disabilities have four basic evacuation options:

- Horizontal evacuation: Using building exits to the outside ground level or going into unaffected wings of multi-building complexes;
- Stairway evacuation: Using steps to reach ground level exits from building;
- Shelter in place: Unless danger is imminent, remain in a room with an exterior window, a telephone, and a solid or fire resistant door. If the individual requiring special evacuation assistance remains in place, they should dial 911 immediately and report their location to emergency services, who will in turn relay that information to on-site responders. The shelter in place approach may be more appropriate for sprinkler protected buildings where an area of refuge is not nearby or available. It may be more appropriate for an individual who is alone when the alarm sounds;
- Evacuation chairs or a light-weight solution to descending stairways can be used and generally require single user operation. If the college is equipped with an evacuation chair, best practice indicates that all employees are trained and have practiced evacuating using an evacuation chair.

Evacuation Procedures for Individuals with Mobility Disabilities, Hearing Disabilities, and Visual Disabilities:

Individuals with disabilities should follow the following procedures:

- Mobility disabilities (individuals who use wheelchairs or other personal mobility devices (“PMDs”)): Individuals using wheelchairs should be accompanied to an area of rescue assistance by an employee or shelter in place when the alarm sounds. The safety and security staff will respond to each of the areas of rescue assistance every time a building evacuation is initiated to identify the individuals in these areas and notify to emergency responders how many individuals need assistance to safely evacuate.

INVER HILLS COMMUNITY COLLEGE
AFFIRMATIVE ACTION PLAN 2014-2016

- Mobility disabilities (individuals who do not use wheelchairs): Individuals with mobility disabilities, who are able to walk independently, may be able to negotiate stairs in an emergency with minor assistance. If danger is imminent, the individual should wait until the heavy traffic has cleared before attempting the stairs. If there is no immediate danger (detectable smoke, fire, or unusual odor), the individual with a disability may choose to wait at the area of rescue assistance until emergency responders arrive to assist them.
- Hearing disabilities: The college's buildings are equipped with fire alarm horns/strobes that sound the alarm and flash strobe lights. The strobe lights are for individuals with who are deaf and/or hard of hearing. Individuals with hearing disabilities may not notice or hear emergency alarms and will need to be alerted of emergency situations.
- Visual disabilities: The college's buildings are equipped with fire alarm horn/strobes that sound the alarm and flash strobe lights. The horn will alert individuals who are blind or have visual disabilities of the need to evacuate. Most individuals with visual disabilities will be familiar with their immediate surroundings and frequently traveled routes. Since the emergency evacuation route is likely different from the common traveled route, individuals with visual disabilities may need assistance in evacuating. The assistant should offer assistance, and if accepted, guide the individual with a visual disability through the evacuation route.

Severe Weather Evacuation Options:

Individuals with disabilities or who are in need of assistance during an evacuation have three evacuation options based on their location in their building:

- Horizontal evacuation: If located on the ground or basement floor, severe weather shelter areas are located throughout each floor;
- Elevator evacuation: If there are no safe areas above the ground floor, the elevator may be used to evacuate to the ground or basement levels; and/or
- Shelter in Place: Seeking shelter in a designated severe weather shelter and remaining there until the all clear is used.

IX. GOALS AND TIMETABLES

Through the utilization analysis, the college has determined which job categories are underutilized for women, minorities, individuals with disabilities, and veterans within the college and has set the following hiring goals for the next two years (Reference Table 2).

INVER HILLS COMMUNITY COLLEGE
AFFIRMATIVE ACTION PLAN 2014-2016

Table 2. Underutilization Analysis and Hiring Goals for 2014-2016

Job Categories	UNDERUTILIZATION – # OF INDIVIDUALS				HIRING GOALS FOR 2014-2016			
	Women	Racial/ Ethnic Minorities	Individuals With Disabilities	Veterans	Women	Racial/ Ethnic Minorities	Individuals With Disabilities	Veterans
Officials/Administrators	-4	2	1	1	0	1	1	1
Professionals	4	-2	0	4	4	0	0	1
Faculty	-10	17	0	9	0	2	0	1
Office/Clerical	-13	-3	1	3	0	0	1	1
Technicians	1	1	0	1	1	1	0	1
Skilled Craft	0	0	0	-1	0	0	0	0
Service Maintenance	4	0	1	1	2	0	1	1

*Fixed-term and adjunct appointments and persons on leave without pay are NOT counted in totals or calculations.

** No Protective Service positions exist at Inver Hills Community College

INVER HILLS COMMUNITY COLLEGE
AFFIRMATIVE ACTION PLAN 2014-2016

Availability:

The college determined the recruitment areas to be: (1) 2010 Minnesota Statewide Labor Force Availability for Professionals/Non-Faculty job categories; (2) 2010 Minneapolis-St. Paul Metropolitan Statistical Area Labor Force Availability for Office/Clerical, Technicians, Skilled Craft, and Service Maintenance job categories; (3) 2010 National Labor Force Availability for Officials/Administrators and Professional/Faculty job categories. In conducting its underutilization analysis, the college used the one factor analysis. The college determined it was best to use this type of analysis because the college does not have enough internal promotions and our internal demographics are lacking diversity.

Underutilization Analysis worksheets are attached in the appendix C. Numbers less than 10 are indicated with "<10" in accordance with Minnesota Management and Budget's guidance on data privacy.

Women:

At the college, the population of women has improved in the Technicians job category and has not improved in the Professionals/Non-faculty and Service Maintenance job categories. The college did not have a hiring goal for women in the Professionals/Non-faculty job category for 2012-2014. Ten women separated from the Professionals/Non-faculty job category during 2012-2014, resulting in a new underutilization.

One woman was hired into the Service Maintenance job category during 2012-2014. There was a separation of a female employee from the Service Maintenance in 2013 which resulted in no net gain. The college did not arrive at the goal set for 2012-2014. However, whatever positions will be filled, the college will continue its recruitment efforts to reach its hiring goals set for women.

Minorities:

The college has reached its 2012-2014 goals for the Professional/Faculty group. However, because of the updated 2010 Labor Force availability numbers, the college is showing increased underutilization in the Professional/Faculty group for 2014-2016. At the college, the population of minorities has improved in the Professionals and Office/Clerical job categories due to new hires: two in the Office/Clerical job category and three in the Professional job category. The college will utilize recruitment strategies to attract and obtain qualified diverse applicants when vacant positions occur in the Officials/Administrators, Faculty, and Technicians groups to reach its 2014-2016 hiring goals.

Individuals with Disabilities:

At the college, the population of individuals with disabilities has remained the same: one separation and one hire during 2012-2014 resulted in no net gain. Because of the updated 2010 Labor Force availability numbers, the college shows some improvement in the job categories Professionals and Faculty. Overall, the college did not arrive at its goals set for people with disabilities for 2012-2014 due to a low number of qualified candidates who identified

INVER HILLS COMMUNITY COLLEGE
AFFIRMATIVE ACTION PLAN 2014-2016

themselves as having a disability. The college identifies an ADA contact person on all job postings to candidates who need an accommodation to participate in the selection processes.

Veterans:

Effective March 2013, the Office of the Federal Contract Compliance Program (OFCCP) included veterans in affirmative action. Going forward, this college will track the hiring and underutilization of veterans in accordance with the OFCCP regulations.

The college eliminated some positions during 2013 through the reorganizational efforts. Due to the budget constraints and in response to the Chancellor Rosenstone's directive to better utilize shared resources, the college over the past two years has been filling fewer of its vacant positions and entering into shared services agreements with other MnSCU two-year colleges to better align our existing resources. Due to the budget shortfall in 2015-2016, the college does not anticipate to do much hiring during 2014-2016.

In spite of the current financial constraints, the college will continue its efforts to recruit qualified candidates with disabilities, women, minorities, and veterans when filling its vacant positions.

X. AFFIRMATIVE ACTION PROGRAM OBJECTIVES

In pursuing the college's commitment to affirmative action, the college will take the following actions during 2014-2016:

Objective #1: Educate all managers, supervisors and search advisory committees about their affirmative action responsibilities.

Action Steps:

1. Educate managers/supervisors about their role in implementing the affirmative action plan and their responsibilities in retaining protected group members.
2. Ensure that EEO/AA responsibility statements are included in supervisors and administrators position descriptions as the position descriptions are reviewed by HR.
3. Perform pre-employment reviews to determine if hiring process requirements unnecessarily screen out a disproportionate number of women, minorities, individuals with disabilities, or veterans.
4. Apprise search advisory committees on the college's affirmative action hiring goals.
5. Require all new managers and supervisors to attend core training which includes an overview of affirmative action, the Americans with Disabilities Act and discrimination/harassment training.
6. Design and implement online training which includes EO/AA for search advisory committee members.

Assignment of Responsibility: Director of Human Resources, AAO

INVER HILLS COMMUNITY COLLEGE
AFFIRMATIVE ACTION PLAN 2014-2016

Target Date(s) for Completion: For Action Step #6, Fall 2015.
Other Steps-Ongoing

Evaluation:

Objectives #1- 5 were set in the college's last Affirmative Action Plan and will continue in the new Affirmative Action Plan to ensure the college's ongoing commitment to the affirmative action/equal employment opportunity. The college will maintain supervisory/managerial training records, and pre-hiring review forms.

Objective #2: Recruit and hire affirmatively.

Action Steps:

1. Develop and implement an affirmative recruitment plan for each vacant/new position to be posted externally where disparity exists.
2. Review all position postings to ensure that they include a statement on diversity.
3. Collect and analyze recruitment data from unclassified searches to determine best sources to recruit affirmatively. Research and identify additional successful recruitment sources to attract qualified diverse applicants.
4. Communicate opportunities for advancement to all employees, including people of color, women, people with disabilities, and veterans.
5. Recruit affirmatively for temporary positions to create a feeder group for unlimited positions across the college.
6. Conduct pre-hire reviews for all vacancies for which a disparity exists. Evaluate the search processes periodically to ensure fair hiring practices.
7. Train staff involved in the recruiting, screening, selection, promotion, discipline and related processes.
8. Make an effort to include a diverse representation on search advisory committees.
9. Maintain files with documentation on affirmative and justified hires as well as missed opportunities. Submit required reports to MMB.
10. Periodically report to administrators, managers and supervisors on progress towards achieving the affirmative action hiring goals.
11. Encourage employees with disabilities and veterans to self-identify during the biennial survey. IHCC does not pressure employees to report their disability and/or veteran status; therefore, workforce numbers may not accurately reflect the actual number of disabled individuals and veterans employed at IHCC.

Assignment of Responsibility: AAO, Director of Human Resources

Inver Hills Community College Human Resources Office

Target Date(s) for Completion: Ongoing

Evaluation:

Objectives listed above were set in the college's last Affirmative Action Plan and will continue in the new Affirmative Action Plan to ensure the college's ongoing commitment to recruit affirmatively and maintain fair hiring processes. Due to the recruitment efforts during 2012-

INVER HILLS COMMUNITY COLLEGE
AFFIRMATIVE ACTION PLAN 2014-2016

2014, the college reached its hiring goals for people of color, women, and, partially, for people with disabilities. A low number of qualified candidates who identified themselves as having a disability kept the college from fully meeting the hiring goals in the last biennial AA Plan.

The number of new recruitment sources such as AcademicKyes with diverse option, Diverse Issues in Higher Education, Latinos in Higher Education, Latino Economic Development Center (EON), Minnesotaworks.net-veteran friendly option, organizations within Dakota County serving immigrants, and Workforce Diversity Email List/MMB were used in filling the college's vacancies during the past year. The college also used such recruitment strategies as a targeted vacancy notice distribution and personal contacts and networking. The college is a part of the Upper Midwest Higher Education Recruitment Consortium (HERC), which seeks to reach diverse candidates for positions in higher educations. The college's recruitment budget for the last year was set at \$12,000.

Objective #3: Enhance the college's retention efforts.

Action Steps:

1. Design and implement a comprehensive new staff orientation program; continue to refine a comprehensive new faculty orientation program to help individuals succeed in their early years of employment.
2. Communicate MnSCU's Nondiscrimination in Employment and Education Policy, and Sexual Violence policy to all employees at the start of each academic year semester.
3. Ensure all new employees complete required training on sexual harassment. Provide information on MnSCU's sexual harassment and sexual violence policies to new employees. Ensure posters about the Nondiscrimination in Employment and Education Policy and how to make complaints are properly displayed on campus.
4. Notify all employees annually on the procedure for requesting and providing reasonable accommodations. Allocate sufficient resources in a consolidated reasonable accommodation budget housed in Human Resources.
5. Provide information about the Employee Assistance Program.
6. Provide funding to employees for individual academic degree completion and professional development activities.
7. Provide campus-wide faculty and staff development programs.
8. Oversee the creation of individual employee development plans as part of the annual performance appraisal.
9. Conduct an online exit interview survey with unlimited (permanent) status employees who resign or retire and analyze the results on an annual basis.
10. Complete separation analysis to determine whether turnover rates among protected groups differ from those of the general college employee population.
11. Analyze promotional patterns to identify whether disparities exist between protected group members and non-protected group members. Identify the decision-making process and potential barriers if a disparity exists.
12. Include questions on the environment for diversity in the campus climate survey.

INVER HILLS COMMUNITY COLLEGE
AFFIRMATIVE ACTION PLAN 2014-2016

Assignment of Responsibility: AAO, Director of Human Resources

Inver Hills Community College Human Resources Office

Target Date(s) for Completion: Step #1-August 2015; Step #12-Spring 2017; Other steps-Ongoing

Evaluation:

Most of the listed above objectives were set in the college's last Affirmative Action Plan and will continue in the new Affirmative Action Plan to support the college's ongoing efforts in retaining diverse employees by ensuring a safe, productive and efficient work environment free of harassment and discrimination. The college will maintain records on the number of protected-class hires achieved and retained. The college will maintain records of the communications about the MnSCU's Nondiscrimination in Employment and Education Policy sent to all college employees at the start of each academic semester.

Objective #4: Enhance the appreciation and recognition of diversity.

Action Steps:

1. Promote implementation of the college's diversity plan for 2014-2016.
2. Create awareness among qualified diverse applicants (e.g., people of color, people with disabilities, veterans, and women) about vacant positions where a disparity exists.
3. Collaborate with Institutional Research on researching best practices in the areas of student programming (e.g., tools, issues, etc.) related to assessing the campus environment regarding diversity.
4. Actively support the Student Senate leadership with diverse initiatives.
5. Create and support initiatives designated to promote an environment of respect, belongingness, enrichment, and appreciation of various cultures and positive interactions among all members of the campus community. These include diversity workshops, seminars, cultural presentations and similar activities.
6. Coordinate faculty and staff development activities regarding cultural diversity issues and barriers in the classroom and workplace. Add a Diversity Council representative to the AD Day Committee for faculty and staff.
7. Promote an Access and Inclusion center that offers educational resources on diversity and multiculturalism for the campus community.

Assignment of Responsibility: Diversity Council, Director of Diversity and Equity

Target Date(s) for Completion: Ongoing

Evaluation:

The Diversity Council is comprised on average of 27 members representing faculty, staff, administrators, and students at the college, and is a place for faculty and staff to share issues, concerns or successes. The members of Diversity Council conducted three professional development day events for faculty such as Changing Demographics, Document Accessibility and Student Parent Initiative.

INVER HILLS COMMUNITY COLLEGE
AFFIRMATIVE ACTION PLAN 2014-2016

The Director of Diversity and Equity met with the Director of Institutional Research to develop a new way to assess Accessibility and Inclusion programs and aided in the creation of the pilot cross-cultural certificate program implemented at the college during 2012-2013. This initiative was designed to better equip the college's student affairs staff in areas of cultural competence. Twenty participants from student affairs have completed this cross-cultural competency course so far.

The Center for Accessibility and Inclusion opened in 2013. This is a space for students to socialize, get advising assistance, do homework and feel comfortable to have social justice conversations and obtain resources. On average, the Center served 40 students a month in the past year.

Seven diverse perspective workshops were conducted by the members of the Diversity Council at the college in the past year focusing on gender and sexual orientation. The workshops are designed for IHCC students; however, they were widely publicized and opened to all faculty and staff. The college continues to increase the number of participants at these events.

XI. METHODS OF AUDITING, EVALUATING AND REPORTING PROGRAM SUCCESS

A. Pre-Employment Review Procedure/Monitoring the Hiring Process

To ensure that hiring practices support the college's commitment to hire affirmatively in a work environment free of discrimination the following activities will be conducted:

Pre-Employment Review Process

When a vacancy occurs in an EEO4 job group where underutilization exists, the procedures below will be followed **before** an offer of employment is made:

1. The hiring supervisor submits a personnel requisition and a current position description for the vacancy to be filled.
2. The Affirmative Action Officer and/or the Human Resources staff works closely with the hiring supervisor in an effort to eliminate the disparity according to the following procedure:
 - a. All position descriptions shall contain job related criteria (knowledge, skills, and abilities) that are required to perform the essential functions of the position.
 - b. Job related minimum requirements (and preferred requirements) must be clearly defined and documented on the vacancy announcement.
 - c. The job announcement is posted with the appropriate bargaining unit contract requirements for bidding/claiming by eligible employees.
 - d. The Affirmative Action Officer/HR staff, with input from the hiring supervisor, determines if an external recruitment effort is required.

INVER HILLS COMMUNITY COLLEGE
AFFIRMATIVE ACTION PLAN 2014-2016

f. If an external recruitment effort is required, the Affirmative Action Officer/HR staff will develop and implement a recruitment plan that includes resources that have contacts with protected class candidates in accordance with the affirmative action goals for the position.

g. Applicants are provided with the opportunity to voluntarily identify as a protected group member in the employment application materials. Protected group information is viewed only by the Affirmative Action Officer, and is not shared with the hiring supervisor or search advisory committee.

e. The Affirmative Action Officer examines the initial applicant pool for sufficient diversity. If necessary, additional recruitment is initiated to obtain a well-diversified pool of candidates.

3. All personnel involved in the selection process are trained and held accountable for the college's commitment to equal opportunity and the affirmative action program and its implementation.

Pre-Interview process

1. Prior to the commencement of the interview process, the hiring supervisor shall submit a list of job related questions to the Affirmative Action Officer for review. The Affirmative Action Officer shall review and approve all interview questions to ensure that the questions are job-related and non-discriminatory, and are within the legal parameters of the Equal Employment Opportunity guidelines. The hiring supervisor shall also submit any other desired selection tools (such as work samples, teaching demonstrations, etc.) to the Affirmative Action Officer/HR staff for approval prior to use.

2. Human Resources staff will screen the applications for minimum qualifications, and preferred qualifications if requested by the hiring supervisor, and will notify candidates screened out. Candidate applications that meet the screening criteria will be referred to the hiring supervisor.

3. The hiring supervisor and/or a search advisory committee will determine job-related criteria for the interview pool, screen forwarded applicants against criteria, and select interviewees.

4. The hiring supervisor or a search advisory committee chair will document the reasons for selection/non-selection of candidates for interview. The interview pool shall be submitted to the Affirmative Action Officer for approval before the interviews begin.

5. The Affirmative Action Officer will review and approve the interview pool or request inclusion of additional candidates to meet affirmative action goals, and/or for consistency of screening. To the extent possible, the disparate group will be represented in the final interview applicant pool. However, the primary consideration in determining the interview pool will be the posted required and preferred job related qualifications of the position to be filled.

6. When candidates are offered interviews, employees scheduling interviews will describe the interview format to the candidate and provide an invitation to request a reasonable accommodation for individuals with disabilities to allow the candidate equal opportunity to

INVER HILLS COMMUNITY COLLEGE
AFFIRMATIVE ACTION PLAN 2014-2016

participate in the interview process. For example, candidates will be told whether they may arrive early to review interview questions or what technology may be used during the interview process. This allows for an individual with a disability to determine if they may need a reasonable accommodation in advance of the interview.

7. The hiring supervisor and/or the search advisory committee will conduct interviews using the approved interview questions. The hiring supervisor will ensure that each candidate is asked the same job-related interview questions. Leeway is allowed for follow-up questions of clarity. The hiring supervisor and/or the search advisory committee shall document the responses to the interview questions made by each candidate.

Post Interview Process

1. The hiring supervisor and/or the search advisory committee will compare the qualifications of candidates based on available evidence and the requirements of the job to select a finalist(s) for the position.

2. After the hiring supervisor selects finalists for classified positions where scored interviews were conducted, the Affirmative Action Officer will review the documented basis for the decision.

3. After the conclusion of the hiring process, the Affirmative Action Officer will review all search materials and complete MMB's Monitoring Hiring Process form to document whether a hire was affirmative or not. If the hire was non-affirmative, the reason(s) for selection of a non-protected group candidate will be documented.

4. Any time the college cannot justify a hire, the Affirmative Action Officer identifies a missed opportunity. College leadership will be asked to authorize the missed opportunity. The college will report the number of affirmative and nonaffirmative hires as well as missed opportunities to Minnesota Management and Budget on a quarterly basis.

B. Pre-Review Procedure for Layoff Decisions

Inver Hills Community College will make layoff determinations consistent with applicable collective bargaining agreements and personnel plans. The Affirmative Action Officer will review proposed layoffs to confirm that they are based on sound, non-discriminatory business reasons before the layoff action is taken.

C. Other Methods of Program Evaluation

Inver Hills Community College submits the following compliance reports to Minnesota Management and Budget as part of our efforts to evaluate its affirmative action program:

- Quarterly Monitoring the Hiring Process Reports
- Biannual Affirmative Action Plan
- Annual Americans with Disabilities Act Report
- Annual Internal Complaint Report and
- Disposition of Internal Complaint (within 30 days of final disposition).

Inver Hills Community College maintains the following records on each vacancy filled:

- Interview questions and selection tools
- Interview notes
- Specific recruitment activities undertaken, including cost
- Disposition of each application
- MMB Monitoring Hiring Process forms

The college also evaluates its Affirmative Action Plan in the following ways:

- Monitors progress toward stated goals by job category (ongoing);
- Analyzes employment activity (hires, promotions, and terminations) by job category to determine if there is a disproportionate impact on protected groups (upon request and every two years);
- Analyzes compensation program to ensure it is administered in a nondiscriminatory fashion;
- Reviews the accessibility of online systems and websites, and ensures that reasonable accommodations can be easily requested; and
- Discusses progress with college leadership on a periodic basis and makes recommendations for improvement (as needed).

XII. RECRUITMENT PLAN

The objective of this recruitment plan is to ensure that the college's recruitment programs are publicly marketed; attract and obtain qualified applicants; enhance the image of State employment, and assist in meeting college affirmative action goals to achieve a diverse workforce.

INVER HILLS COMMUNITY COLLEGE
AFFIRMATIVE ACTION PLAN 2014-2016

Recruitment costs incurred during the 2012-2014 plan year totaled \$11, 580.

Below are various recruitment methods or strategies utilized by the college during the past year.

A. Advertising Sources

The following recruitment sources were utilized by the college during the past year: MnSCU Employment Opportunities, Resumix, HERC, MinnesotaDiversity.com, HigherEdJobs.com, GovernmentJobs.com, University of Minnesota, Workforce Diversity, DEED Veterans Coordinator, Email List-MN, Latino Economic Development Center, Jobs for Wisconsin Grads, Minnesotaworks.net, Metropolitan State University, Top Higher Education Jobs, Chronicle of Higher Education (online), National Association of EMS Educators, Jobvertise.com, MN Organization of Leaders in Nursing, Nurse.com, Augsburg College, St. Catherine University, MathProfessional/AMATYC, Concordia University, Regis University, Minnesota Council of Nonprofits, University of Iowa, Academic Keys with the diverse option (online), Diverse Issues in Higher Education (online), Latinos in Higher Education (online), Association of American Colleges & Universities, Chicano Latino Affairs Council, Neighborhood House, Mexican Consulate in MN, CLUES, and Pauly Group, Inc.

Statistical data available from the college's applicant tracking system for unclassified positions show that the most effective sources in the past year have been identified as: HigherEdJobs.com, MnSCU Employment Opportunities, Inver Hills Community College web site, Pauly Group, Inc., Chronicle of Higher Education (web only), and HERC. The college will continue to evaluate such sources as Academic Keys and Diverse Issues in Higher Education. Such sources as Latinos in Higher Education (online), Nurse.com, and National Association of EMS Educators were ineffective. The college will consider whether these sources should be utilized in the future.

B. Recruitment for Individuals with Disabilities

The college acknowledges that there is an underutilization of people with disabilities in Officials/Administrators, Office/Clerical, and Service Maintenance groups and will continue its efforts to recruit qualified applicants with disabilities. The Affirmative Action Officer develops a recruitment plan for each position (except clerical and maintenance for which sufficient amount of applicants are obtained through the State Recruitment System/Resumix) and discusses the recruitment plan with the hiring manager. The search advisory committees are apprised of the college's affirmative action hiring goals. The Affirmative Action Officer ensures that recruitment, screening, referral and selection processes demonstrate good-faith efforts to remove barriers and expand employment opportunities for people with disabilities. The Affirmative Action Officer works closely with the Program Specialist from the Vocational Rehabilitation Services/DEED to promote vacant positions among the disability communities within the State of Minnesota and beyond. The Affirmative Action Officer runs and analyzes recruitment sources reports from the unclassified online applicant tracking system which helps to identify which recruitment sources attract the most qualified applicants with disabilities. The

INVER HILLS COMMUNITY COLLEGE
AFFIRMATIVE ACTION PLAN 2014-2016

following recruitment sources have been used in the past year to target underrepresented populations including people with disabilities: HigherEdJobs.com-Affirmative Action emails, Chronicle of Higher Education (online), Diverse Issues in Higher Education, MinnesotaDiversity.com, and Minnesotaworks.net. The college will continue its efforts in identifying and using sources to improve recruitment of persons with disabilities.

C. Relationship Building and Outreach

During the 2012-2014 period, the college made the following efforts to build relationships with local community resource centers for outreach and recruitment of diverse student populations:

- Admissions staff participated in MnACC (Minnesota Association of Counselors of Color) events – college fairs targeting diverse populations, and annual conference representation.
- Arranged for enhanced and expanded visit opportunities for AVID (8th-12th grades) students from area schools.
- Admissions staff collaborated extensively with Service Learning events that were on campus, with 6th – 12th grade students who were AVID students, or from underrepresented backgrounds.
- Admissions staff participated in Inver Hills Transition Partners efforts (ABE, Workforce Development, other IHCC/DCTC stakeholders).
- Admissions staff participated in the STEM-Scholars grant efforts that targeted underrepresented, low-income students interested in STEM majors.
- Admissions staff organized and represented Inver Hills Community College at community events in the surrounding Twin Cities area: Cinco de Mayo, South St. Paul; Pride Festival, Minneapolis; and Rondo Days, St. Paul.
- Admissions staff, with the help of faculty, led and helped coordinate outreach efforts within the Hispanic/Latino community, developing relationships with key community stakeholders, families and prospective students. These admissions staff were bilingual in Spanish and English.
- Admissions staff continued to contribute to Wellstone Center / Neighborhood House outreach, which now is done at an annual Open House that is coordinated by staff at NH.
- Admissions staff has assisted in TRiO Summer Bridge programming, leading select sessions and participating in the off-site weekend retreat.
- Admissions staff attended and presented at the South St. Paul GED graduation ceremony that has been held on the Inver Hills campus for 40 years. Outreach and an invitation to apply is made to all GED graduates.
- Admissions staff are actively working on the Distance and Adult Learning Strategic Planning Committee, and participate in professional development opportunities (conferences and conference presentations) regarding Adult Learning opportunities at IHCC.
- Admissions staff participated in TCAEA (Twin Cities Adult Education Alliance) college and career fairs in 2012-2013.

INVER HILLS COMMUNITY COLLEGE
AFFIRMATIVE ACTION PLAN 2014-2016

- The Admissions team now includes the Education Coordinator at South of the River Education Center (co-located with the Burnsville Workforce Center), where outreach is intended for Workforce Center participants, and other prospective adult student populations in the western Dakota County/eastern Scott County areas.

D. Additional Recruitment Activities

As part of its recruitment efforts, Inver Hills Community College takes steps to market, identify, and obtain qualified applicants in meeting Affirmative Action goals. The Affirmative Action Officer ensures that all external job postings provide information on how to request reasonable accommodations during the search process. The AAO ensures that all external job postings identify the college as an EEO employer and educator. All job postings are being reviewed to include language on how the college is committed to reflecting diversity among its administrators, faculty and staff.

The college also used such recruitment strategies as a targeted vacancy notice distribution and personal contacts and networking. The college is a part of the Upper Midwest Higher Education Recruitment Consortium (HERC), which seeks to reach diverse candidates for positions in higher educations. The Affirmative Action Officer attends various events provided by Higher Education Recruitment Consortium (HERC) on recruitment to take advantage of professional networking.

The Affirmative Action Officer works with other MnSCU HR staff responsible for recruitment to identify and utilize new recruitment sources including sources targeting underrepresented populations

E. Supported Employment

The college supports the employment of individuals with disabilities and will review vacant positions to determine if job tasks can be performed by a supported employment workers. We will work with community organizations that provide employment services to individuals with disabilities for these positions.

XIII. RETENTION PLAN

Inver Hills is committed to not just the recruitment of women, minorities, individuals with disabilities, and veterans, but also to the retention of these protected groups. As part of its retention efforts, the college utilizes a variety of strategies which involve a coordinated effort among several persons including the Affirmative Action Officer, Human Resources Director, Director of Diversity and Equity, Vice Presidents, Deans, and Supervisors. The Director of Human Resources assists the administrators, supervisors, and managers to identify retention strategies.

A. Individual Responsible for College's Retention Program/Activities

Suzie Brusoe, Director of Human Resources, 651/450-3654, sbrusoe@inverhills.mnscu.edu

INVER HILLS COMMUNITY COLLEGE
AFFIRMATIVE ACTION PLAN 2014-2016

Nella Austin, Affirmative Action Officer, 651/450-3672, naustin@inverhills.edu

B. Separation and Retention Analysis by Protected Groups

Inver Hills Community College experienced a number of separations during the 2013-2014 reporting period: 36 in FY 2013 and 28 in FY 2014. The turnover rate in FY 2013 among the probationary and permanent employees was 31%. Transfers and retirements constituted 55% of separations. In FY 2014, the turnover rate shows an increase to 46%. The percentage of transfers and retirements decreased to 36% of all separations in FY 2014. The college anticipates a decrease in the number of retirements in the next few years among its faculty, staff, and administrators. The AAO will continue to monitor separations of protected group employees to see if there are any patterns that develop. The tables in the appendix D summarize specific data for separation rates for protected group members.

The separation data collected over the FY 2013 and FY 2014 indicated that there is no disparity in separations among women, people of color, and people with disabilities in comparison to the general employee populations.

C. Methods of Retention of Protected Groups

- Inver Hills Community College utilizes an online exit interview for all unlimited, seasonal and probationary employees who resign or retire and wish to participate. Starting July 1, 2010, Human Resources has collected, reviewed and analyzed the results of the 49 online surveys. The survey results have been positive and do not show any issues that need to be addressed by the college Administration. The Affirmative Action Officer will continue monitoring if there are any issues that need to be addressed by the college Administration.
- Inver Hills Community College conducts a climate survey of employees every three years. Last time the climate survey was conducted in Spring 2013. Respondents were asked to indicate their level of agreement (with a score of 1 to 5; 5 meaning strong agreement) on a series of statements relating to eight categories: diversity, service to internal and external customers, organizational culture, communication, policies and procedures, change management, and evaluation and feedback. Sixty-four percent of employees responded.
In the diversity section, employees were asked to indicate their level of agreement with statements that Inver Hills is an inclusive, welcoming environment for both women and men; gay, lesbian, bisexual and transgender people; people from different racial and ethnic backgrounds, older individuals; people of all religions, and people with disabilities. Employees were also asked to indicate their level of agreement that the college has clear procedures for addressing discrimination, recruits a diverse workforce, and provides programs to employees to increase diversity knowledge. Among the eight categories assessed in the climate survey, employees gave Inver Hills their highest ratings in the diversity category with an average rating of 4.07.
- Each supervisor is expected to work with his/her staff to create a professional development plan as a part of the performance evaluation process. Faculty also

INVER HILLS COMMUNITY COLLEGE
AFFIRMATIVE ACTION PLAN 2014-2016

develop individual development plans of one to three years. Inver Hills Community College believes that training is a very important tool in retaining employees. The Staff Development fund provides funding to individual employees to complete a post-secondary degree and attend professional development activities. The Staff Development Committee plans three campus-wide staff development events and several small group workshops each year. The Faculty Development fund finances individual faculty development activities. Collective bargaining agreements provide tuition free credits each year to eligible employees to attend a two or a four year MnSCU institution. 13 % of eligible employees (faculty and staff) used tuition waiver in FY 2013. 15% of eligible employees used tuition waiver in FY 2014.

- Inver Hills Community College has developed a formal Diversity Plan and has incorporated diversity awareness and training into this plan. The formal plan has been implemented and is reviewed and updated on an annual basis by the Diversity Council. The College will continue its commitment to diversity by continuing to sponsor a variety of multicultural activities for both students and staff to increase awareness and build a community that appreciates diversity. Past and current offerings include topics such as race and racism, working with students with disabilities, gay/lesbian/bisexual/transgender awareness, working with victims of war and torture, classroom strategies for working with immigrant students, strategies for working with people with limited English language and people in poverty, and gender equity and athletics.
- In FY 2013 the newly developed Center for Accessibility and Inclusion served on average 40 students a month. This is a space for students to socialize, get advising assistance, do homework and feel comfortable to have social justice conversations and obtain resources. On average 165 students per semester visit the center. The center now includes Disability Resources for students. In conjunction with counseling, the center is aiming to provide more resources to this ever expanding population.
- The Diversity Council also created Diverse Perspectives, a workshop series for Inver Hills students, faculty and staff. The workshops are highly interactive and encourage dialogue on difficult topics. During the 2013-2014 school years, the theme of seven Diverse Perspectives workshops was gender and sexual orientation. The workshops are widely publicized and all employees are invited to attend.
- The Diversity Council conducted three professional development events for faculty on the changing demographics, document accessibility, and the new student parent initiative.
- The Director of Diversity and Equity conducted four workshops in FY2013 for students on global citizenship, personal responsibility, race and the media, and hate language.
- The Cross Cultural Competency Course (CCCC), a new initiative was developed in FY 2013 to better equip our student affairs staff in areas of cultural competence. This is an eight-

INVER HILLS COMMUNITY COLLEGE
AFFIRMATIVE ACTION PLAN 2014-2016

week course that staff could voluntarily sing up for and obtain a certificate of participation for attending five sessions out of eight total.

The Diversity Council will be exploring other topics on diversity in the coming academic year(s).

APPENDIX

A. Complaint of Discrimination/Harassment Form

**Minnesota State Colleges and Universities
Discrimination/Harassment Complaint Form**

Inver Hills Community College
2500 E. 80th Street
Inver Grove Heights, MN 55076
(651) 450-3654

PLEASE READ BEFORE COMPLETION OF FORM

Any complaint of discrimination/harassment is considered confidential data under Minnesota Statute 13.39, Subd. 1 and 2. This information is being collected for the purpose of determining whether discrimination/harassment has occurred. You are not legally required to provide this information, but without it, an investigation cannot be conducted. This information may only be released to the Affirmative Action Officer designee, the complainant, the respondent, and appropriate personnel.

Date: _____

Name of COMPLAINANT: _____

(if more than one complainant, complete intake form for each)

Address (local): _____

Address (residence): _____

City: _____ State: _____ Zip: _____

Phone: (work) _____ (home) _____

Sex: Male Female

Status: Student Faculty Staff Administrator External/Non-Campus

INVER HILLS COMMUNITY COLLEGE
AFFIRMATIVE ACTION PLAN 2014-2016

TYPE OF COMPLAINT: DISCRIMINATION HARASSMENT RETALIATION

I WAS DISCRIMINATED/HARASSED/RETALIATED AGAINST ON THE BASIS OF MY:

- | | | |
|--|--|--|
| <input type="checkbox"/> Race | <input type="checkbox"/> Age | <input type="checkbox"/> Reliance on Public Assistance |
| <input type="checkbox"/> Sex | <input type="checkbox"/> National Origin | <input type="checkbox"/> Sexual Orientation |
| <input type="checkbox"/> Color | <input type="checkbox"/> Disability | <input type="checkbox"/> Marital Status |
| <input type="checkbox"/> Creed | <input type="checkbox"/> Religion | <input type="checkbox"/> Membership/Activity in Local Commission |
| <input type="checkbox"/> Gender Identity | <input type="checkbox"/> Gender Expression | |

I believe I was discriminated/harassed/retaliated against by:
Name of RESPONDENT: _____
(if more than one respondent, list complete information for each)
Address (local): _____
Address (residence): _____
City: _____ State: _____ Zip: _____
Phone: (work) _____ (home) _____
Sex: Male Female
Status: Student Faculty Staff Administrator External/Non-Campus

Name of RESPONDENT #2: _____
(if more than one respondent, list complete information for each)
Address (local): _____
Address (residence): _____
City: _____ State: _____ Zip: _____
Phone: (work) _____ (home) _____
Sex: Male Female
Status: Student Faculty Staff Administrator External/Non-Campus

Name of RESPONDENT #3: _____
(if more than one respondent, list complete information for each)

INVER HILLS COMMUNITY COLLEGE
AFFIRMATIVE ACTION PLAN 2014-2016

Address (local): _____

Address (residence): _____

City: _____ State: _____ Zip: _____

Phone: (work) _____ (home) _____

Sex: Male Female

Status: Student Faculty Staff Administrator External/Non-Campus

Name of RESPONDENT #4: _____
(if more than one respondent, list complete information for each)

Address (local): _____

Address (residence): _____

City: _____ State: _____ Zip: _____

Phone: (work) _____ (home) _____

Sex: Male Female

Status: Student Faculty Staff Administrator External/Non-Campus

INVER HILLS COMMUNITY COLLEGE
AFFIRMATIVE ACTION PLAN 2014-2016

LIST POTENTIAL WITNESSES YOU BELIEVE POSSESS INFORMATION ABOUT YOUR COMPLAINT. ADD ADDITIONAL PAGES IF NECESSARY.

Name of WITNESS #1: _____
(if more than one witness, list complete information for each)

Address (local): _____

Address (residence): _____

City: _____ State: _____ Zip: _____

Phone: (work) _____ (home) _____

What information can this witness provide? _____

Name of WITNESS #2: _____
(if more than one witness, list complete information for each)

Address (local): _____

Address (residence): _____

City: _____ State: _____ Zip: _____

Phone: (work) _____ (home) _____

What information can this witness provide? _____

Name of WITNESS #3: _____
(if more than one witness, list complete information for each)

Address (local): _____

Address (residence): _____

City: _____ State: _____ Zip: _____

Phone: (work) _____ (home) _____

What information can this witness provide? _____

B. Employee/Applicant Request for ADA Reasonable Accommodation Form



**State of Minnesota – Inver Hills Community College
Employee/Applicant Request for ADA Reasonable Accommodation Form**

The State of Minnesota is committed to complying with the Americans with Disabilities Act (“ADA”) and the Minnesota Human Rights Act (“MHRA”). To be eligible for an ADA accommodation, you must be 1) qualified to perform the essential functions of your position and 2) have a disability that limits a major life activity or function. The ADA Coordinator/Designee will review each request on an individualized case-by-case basis to determine whether or not an accommodation can be made.

Employee Name: _____ Job Title: _____

Work Location: _____

Data Privacy Statement: This information may be used by the system office, college, or university human resources representative, ADA Coordinator or designee, the system office, college, or university legal counsel, or any other individual who is authorized by the system office, college, or university to receive medical information for purposes of providing reasonable accommodations under the ADA and MHRA. This information is necessary to determine whether you have a disability as defined by the ADA or MHRA, and to determine whether any reasonable accommodation can be made. The provision of this information is strictly voluntary; however, if you refuse to provide it, the system office, college, or university may refuse to provide a reasonable accommodation.

Questions to clarify accommodation requested.

1. What specific accommodation are you requesting?
2. If you are not sure what accommodation is needed, do you have any suggestions about what options we can explore.
 - a. If yes, please explain.

Questions to document the reason for the accommodation request *(please attach additional pages if necessary)*.

1. What, if any job function are you having difficulty performing?
2. What, if any employment benefit are you having difficulty accessing?

State of Minnesota – Inver Hills Community College
Reasonable Accommodation Request Form, Page 2

3. What limitation as result of your physical or mental impairment is interfering with your ability to perform your job or access an employment benefit?
4. If you are requesting a specific accommodation, how will that accommodation be effective in allowing you to perform the functions of your job?

Information Pertaining to Medical Documentation

In the context of assessing an accommodation request, medical documentation may be needed to determine if the employee has a disability covered by the ADA and to assist in identifying an effective accommodation.

The ADA Coordinator/Designee in each college or university is tasked with collecting necessary medical documentation. In the event that medical documentation is needed, the employee will be provided with the appropriate forms to submit to their medical provider. The employee has the responsibility to ensure that the medical provider follows through on requests for medical information.

This authorization does not cover, and the information to be disclosed should not contain, genetic information. "Genetic Information" includes: Information about an individual's genetic tests; information about genetic tests of an individual's family members; information about the manifestation of a disease or disorder in an individual's family members (family medical history); an individual's request for, or receipt of, genetic services, or the participation in clinical research that includes genetic services by the individual or a family member of the individual; and genetic information of a fetus carried by an individual or by a pregnant woman who is a family member of the individual and the genetic information of any embryo legally held by the individual or family member using an assisted reproductive technology.

Employee Signature: _____ Date: _____

INVER HILLS COMMUNITY COLLEGE
AFFIRMATIVE ACTION PLAN 2014-2016

C. Underutilization Analysis Worksheets

Due to some numbers that are less than 10, the underutilization analysis charts are removed from this version of the plan. The charts are on file.

D. Separation Analysis by Protected Groups Worksheets

Due to some numbers that are less than 10, the separation analysis charts are removed from this version of the plan. The charts are on file.