



EQUAL EMPLOYMENT OPPORTUNITY PLAN

**Approved by
Board of Trustees
June 2024 – June 2027**

NAPA VALLEY COLLEGE
Equal Employment Opportunity Plan

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Component 1: Introduction

The Napa Valley Community College District (“NVCCD” or “District”) believes that taking active and vigorous steps to ensure equal employment opportunity and creating a welcoming and inclusive environment will foster diversity and promote excellence. Through an educational experience in an inclusive environment, our students will be better prepared to work and live in an increasingly global society.

The District is committed to employing qualified administrators, faculty, and staff members who are dedicated to student success and to recruiting and hiring persons from diverse backgrounds. Diversity in the academic environment fosters cultural awareness and competency, promotes mutual understanding and respect, and provides suitable role models for all students including first generation students, underrepresented students, and Black, Indigenous, and People of Color (BIPOC) students.

The District is a community of people from diverse racial, ethnic, linguistic, and socio-economic backgrounds, representing a wide range of national origins, religions, political beliefs, physical and mental abilities, ages, sexual orientations and gender expressions.

The District recognizes that a lack of diversity reflected in its staff and faculty directly impacts the quality of instruction and student services programs serving a diverse student population.

The District’s Board of Trustees adopted the Equal Employment Opportunity (“EEO”) Plan (“Plan”) on June 13, 2024. The Plan focuses on providing equal employment opportunity in the District’s recruitment, hiring, and retention policies and practices pursuant to the applicable Regulations of the Board of Governors of the California Community Colleges (Title 5 of the California Code of Regulations, Sections 53000 *et seq.*). The Plan includes a summary of a complaint procedure for allegations of noncompliance with the EEO Plan; the use of an EEO Advisory Committee to help facilitate implementation of this Plan; highlights methods to support equal employment opportunity and an environment that is welcoming to all; and identifies procedures for dissemination of the Plan. The District will review the Plan annually, which will include assessment of the District’s progress towards meeting its EEO Program goals.

Dr. Torence Powell

Superintendent/President

Component 2: Definitions

References: CCR, Title 5, § 53002

The District uses the following definitions to provide clarification and understanding of specific terms used throughout the Plan.

1. *Adverse Impact:* A disproportionate negative impact to a group protected from discrimination pursuant to Government Code section 12940, arising from the effects of an employment practice as determined according to a valid statistical measure (such as those outlined in the Equal Employment Opportunity Commission's "Uniform Guidelines on Employee Selection Procedures").
2. *Diversity:* A condition of broad inclusion in an employment environment that offers equal employment opportunity for all persons. The achievement of diversity within a workforce requires the presence, respectful treatment, and inclusion of individuals from a wide range of ethnic, racial, age, national origin, religious, gender, gender identity, sexual orientation, disability and socio-economic backgrounds, in all aspects of the workplace.
3. *Equal Employment Opportunity:* All qualified individuals have a full and fair opportunity to compete for hiring and promotion and to enjoy the benefits of employment with the District. Equal employment opportunity should exist at all levels, in all job categories. Equal employment opportunity also involves:
 - a. Identifying and eliminating barriers to employment that are not job related, such as reliance on preferred job qualifications that do not reasonably predict job performance;
 - b. Updating job descriptions and/or job announcements to reflect accurately the knowledge, skills and abilities of the position, including a commitment to equity; and
 - c. Creating an environment which fosters cooperation, acceptance, democracy, and free expression of ideas, and is welcoming to all persons free from discrimination related to the categories protected by Government Code Section 12940.
4. *Equal Employment Opportunity Plan:* A written document that describes the District's EEO program. The District's Plan shall include: 1) analysis of the District's work force; and 2) descriptions of the District's program and strategies, informed by the District's work force analysis, that it is implementing or will implement, to promote equal employment opportunity.
5. *Equal Employment Opportunity Program:* The combination of District strategies implemented to promote equal employment opportunity. Such programs shall be informed by the District's longitudinal workforce and applicant analyses.
6. *In-house or Promotional Only:* Only existing District employees are eligible for a position.

7. *Job Categories*: For purposes of the Plan, consists of seven (7) categories: executive/administrative/managerial, faculty and other instructional staff, professional non-faculty, secretarial/clerical, technical and paraprofessional, skilled crafts, and service and maintenance.
8. *Monitored Group*: The groups for which the District must provide demographic data pursuant to Section 53004.
9. *Person with a Disability*: Any person who (1) has a physical or mental impairment as defined in Government Code section 12926 which limits one or more of such person's major life activities; (2) has a record of such an impairment; or (3) is regarded as having such an impairment. A person with a disability is "limited" if the condition makes the achievement of the major life activity difficult.
10. *Reasonable Accommodation*: The efforts made by the District in compliance with Government Code section 12926.
11. *Screening or Selection Procedures*: Any measure, combination of measures, or procedure used as a basis for any employment decision. Selection procedures include the full range of assessment techniques, including performance tests, physical, educational, and work experience requirements, interviews, application reviews, reference checks, and similar techniques. Screening and selection procedures shall also include consideration of equivalencies pursuant to Section 53430.
12. *Underrepresented Group*: Any monitored group for which the percentage of persons from that group employed by the District in any job category listed in Title 5, section 53004(a) is below eighty percent (80%) of the projected representation for that group and job category.

Component 3: Policy Statement

References: CCR, Title 5, § 53002

The Board of Trustees supports the intent set forth by the California Legislature to assure that effort is made to build an equity-minded college community that provides opportunities for all and that fosters a climate of respect for diverse peoples and cultures, that includes all employee groups, with the inclusion of faculty and staff from a wide variety of backgrounds. It agrees that diversity in the academic environment fosters cultural awareness, mutual understanding and respect, harmony, and suitable role models for all students. The Board of Trustees therefore commits itself to promote the total realization of equal employment through a continuing equal employment opportunity program. Equal employment opportunities include not only a process for equal opportunity in hiring, but also practices and processes that create inclusive, respectful work environments.

The Superintendent/President shall develop, for review and adoption by the Board of Trustees, a plan for equal employment opportunity that complies with the Education Code and Title 5 requirements as modified or clarified by judicial interpretation from time to time.

This Policy Statement aligns with and incorporates by reference the following Board Policies by reference: 3410, Nondiscrimination; 3420, Equal Employment Opportunity; and 7100, Commitment to Diversity.

Component 4: Delegation of Responsibility, Authority and Compliance

References: CCR, Title 5, §§ 53003(c)(3) and 53020

It is the goal of the District that all employees promote and support equal employment opportunity because such a goal requires a commitment and a contribution from every segment of the District. The general responsibilities for the prompt and effective implementation of this Plan are set forth below.

1. *Board of Trustees*

The Board shall adopt a district-wide, written EEO plan to implement its equal employment opportunity program. Such plans shall:

1. Be developed in collaboration with the district's Equal Employment Opportunity Advisory Committee established pursuant to section 53005;
2. Be reviewed and adopted at a regular meeting of the governing board where it is agendaized as a separate action item, and not part of the consent agenda;
3. Cover a period of three (3) years, after which a new or revised plan shall be adopted; and
4. Be submitted to the Chancellor at least 90 days prior to its adoption. Comments received from the Chancellor's Office on the proposed plan must be presented to the governing board prior to adoption.

2. *Superintendent/President*

The Board delegates to the Superintendent/President the responsibility for ongoing implementation of the Plan and for providing leadership in supporting the District's equal employment opportunity policies and procedures, delegating such authority as appropriate. The Superintendent/President shall advise the Board concerning statewide policy emanating from the Board of Governors of the California Community Colleges and direct the publication of an annual report on Plan implementation. The Superintendent/President shall evaluate the performance of all administrative staff who report directly to the Superintendent/President on their ability to follow and implement the Plan.

3. *Equal Employment Opportunity Officer*

The District has designated the chief human resources officer as its EEO Officer who is responsible for the day-to-day implementation of the Plan. If the designation of the EEO Officer changes before this Plan is next revised, the District will notify employees and applicants for employment of the new designee. The EEO Officer is responsible for administering, implementing and monitoring the Plan and for assuring compliance with the requirements of Title 5, Sections 53000 *et seq.* The EEO Officer is also responsible for: ensuring that applicant pools and selection procedures are properly monitored as required by Title 5, sections 53023 and 53024; preparing annual reports; and receiving complaints described in Component 6 of the Plan and ensuring that such complaints are promptly and impartially investigated. The EEO Officer shall ensure prompt and effective implementation of the requirements of the Plan, work to achieve employee diversity, and avoid disparate impacts, consistent with state and federal law.

4. *Equal Employment Opportunity Advisory Committee*

The District established an EEO Advisory Committee to act as an advisory body to the EEO Officer and the District as a whole to promote understanding and support of EEO policies and procedures. The EEO Advisory Committee shall assist in the development and implementation of the Plan in conformance with state and federal regulations and guidelines, monitor equal employment opportunity progress, and provide suggestions for Plan revisions, as appropriate. The EEO Advisory Committee shall operate in accordance with Plan Component 5.

5. *Selection Committees*

A selection committee member, or any organization or individual, whether or not an employee of the District, who acts on behalf of the Board with regard to the recruitment and screening of personnel is subject to the requirements of the Plan and applicable Title 5 provisions.

6. *Agents of the District*

Any organization or individual who participates in District recruitment or screening of personnel, whether as an employee or as a contractor, is an agent of the District for such purposes only, and is subject to all the requirements of this Plan.

Through the authority articulated in this Plan Component and the Plan generally, the District shall make continuous, good-faith efforts to implement the Plan, achieve employee diversity, and avoid disparate impacts, consistent with state and federal law.

Component 5: Advisory Committee

References: CCR, Title 5, § 53005

The District established an EEO Advisory Committee to assist the District in developing, revising, and implementing District EEO programs and the Plan. The EEO Advisory Committee may also assist in promoting an understanding and support of equal opportunity and nondiscrimination programs, policies, and procedures. The EEO Advisory Committee may sponsor and support events, training, or other activities that promote equal employment opportunity, nondiscrimination, retention, and diversity. When appropriate, the EEO Advisory Committee shall make recommendations to the Board, the Superintendent/President, or the EEO Officer to update the Plan in accordance with applicable policies, procedures, and legislation.

The EEO Officer shall facilitate training of the EEO Advisory Committee on equal employment compliance and the Plan itself. The EEO Advisory Committee, as well as all members of the Board, shall receive training in all of the following:

- a) The requirements of Title 5, Section 53003 and of state and federal nondiscrimination laws;
- b) Identification and elimination of bias in hiring;
- c) The educational benefits of workforce diversity; and
- d) The role of the EEO Advisory Committee in drafting and implementing the Plan.

The EEO Advisory Committee shall be composed of a diverse membership and include members from District stakeholder groups, including, but not limited to, students, faculty, classified professionals and administrators.

The EEO Advisory Committee will be convened initially each year and chaired by the EEO Officer. The committee will be comprised of one member of each constituency: a) classified professionals b) faculty c) administrative/confidential d) student representative e) a member from the DEI committee. Terms of office for the members shall be three (3) years; student representatives will serve annually. The EEO Advisory Committee shall hold a minimum of four (4) meetings per fiscal year, with additional meetings if needed to review EEO and diversity efforts, programs, policies, and progress. The EEO Advisory Committee will review the Plan at least once annually, and any revised Plan will be submitted to the Board and the Office of the Chancellor of the California Community Colleges ("Chancellor's Office").

Component 6: Complaints

References: CCR, Title 5, §§ 53003(c)(4), 53026, and 59300 *et seq.*; BP/AP 3410 Nondiscrimination; AP 3435 Discrimination and Harassment Complaints and Investigations

Any person may file a complaint alleging the District violated the Title 5's equal employment opportunity regulations (California Code of Regulations, Title 5, Section 53000 *et seq.*). Any person who wishes to file such a complaint should use the District's procedures for employment-related complaints, found in Board Policy and Administrative Procedure 3410 and Administrative Procedure 3435.

The District may request, but shall not require, a complainant to submit a complaint on the form prescribed by the Chancellor of the California Community Colleges. A copy of the form will be available at 2277 Napa-Vallejo Highway, Napa, CA 94558 1) Student Services Building, 1300 Assistant Superintendent/Vice President of Student Affairs Office 2) Office of Human Resources and Training & Development, Building 1500 Chief Human Resources Officer 3) [Title IX \(napavalley.edu\)](#)

A complainant must report a complaint to the Assistant Superintendent/Vice President, Human Resources and Training & Development. A complainant should contact the Chief Human Resources Officer, by phone at 707-256-7100 or in person at the District's Human Resources Department, 2277 Napa Vallejo Highway, Office 1544, Napa, California 94558. The Assistant Superintendent/Vice President, Human Resources and Training & Development, or designee will record the verbal complaint in writing. The Assistant Superintendent/Vice President, Human Resources and Training & Development, will take steps to ensure the writing accurately reflects the facts alleged by the complainant. Complaints must be filed with the Assistant Superintendent/Vice President, Human Resources and Training & Development unless the person submitting the complaint alleges a violation against the Assistant Superintendent/Vice President, Human Resources and Training & Development, in which case the complaint should be submitted directly to the District's Superintendent/President.

The District's discrimination and harassment complaint form and procedures can be accessed at the following links:

- 1) [Title IX \(napavalley.edu\)](#)
- 2) <https://www.napavalley.edu/student-services-and-resources/office-of-student-affairs/student-rights-and-responsibilities-and-student-conduct.html>

Component 7: Notification to District Employees

References: CCR, Title 5, § 53003(c)(5)

The District's commitment to equal employment opportunity is emphasized through the broad dissemination of its EEO Policy Statement and the Plan.

Each year, the District will provide all employees with a copy of the EEO Policy Statement (located in Component 3 of this Plan) and a written notice describing the provisions of the Plan and emphasizing the importance of the employee's participation in ensuring the Plan's implementation by incorporating notification in the Selection, EEO and Sexual Harassment trainings. The Office of Human Resources and Training and Development will provide all new employees with a copy of the written notice when they commence their employment with the District, as well as a copy of the EEO Policy Statement and the District's Nondiscrimination policy. The EEO Policy Statement will also be printed in the college catalogs and class schedules.

The Plan and subsequent revisions will be distributed via email to the Board, the Superintendent/President, administrators, leaders of the campus senates (academic, classified, administrative), leaders of the classified and faculty unions, and members of the District's EEO Advisory Committee. The Plan will be available on the District's website, and when appropriate, may be distributed by e-mail.

Component 8: Training for Selection Committees

References: CCR, Title 5, §53003(c)(6) and 53020(c)

Any organization or individual who participates in District recruitment, screening, or selection of personnel, whether as a District employee or official or as a third-party, is subject to all of the Title 5 regulations on equal employment opportunity (Section 53000 *et seq.*) and are expected to comply with the Plan. All individuals directly participating in the screening and selection process shall receive training prior to their initial participation on a screening committee. Following their initial training, a person serving on any subsequent screening or selection committee must have received training within the prior 24 months of their service on such committee. This training is mandatory; individuals who have not received this training as described in this paragraph will not be allowed to serve on screening or selection committees. The Office of Human Resources is responsible for ensuring that all individuals serving on a screening or selection committee receive this mandatory training. Selection Committee training is offered at a minimum of four times during the academic year and additional training is provided as needed.

The mandatory training will include, but may not be limited to:

1. The requirements of the Title 5 regulations on equal employment opportunity (Section 53000 *et seq.*) and the requirements of federal and state nondiscrimination laws;
2. The educational benefits of workforce diversity;
3. The elimination of bias in hiring decisions; and
4. Best practices in serving on a screening or selection committee.

Screening and selection committees shall include a diverse membership whenever possible, to ensure a variety of perspectives are included in the assessment of applicants. District screening committees will be comprised of members from each constituency group: a) Classified Professionals b) Faculty c) Administrator/Confidential d) Students. Screening committee membership may be further defined in appropriate Administrative Procedures. The District strives to build screening committees to reflect the broad diversity that is present on the campus. The Office of Human Resources monitors the membership of each selection committee and coordinate with each constituency group to provide membership on the selection committee with an effort to create a committee that is not homogenous but rather reflects the broad diversity that is present on the campus. This effort is included in the selection committee training to establish the expectation to provide broad representation on our selection committees.

Component 9: Annual Written Notice to Community Organizations

Reference: CCR, Title 5, § 53003(c)(7)

The EEO Officer will provide annual written notice to appropriate community-based and professional organizations regarding the Plan. The notice will inform these organizations that they may obtain a copy of the Plan and will solicit their assistance in identifying pools of applicants. The notice will include a summary of the Plan. The notice will also include the website address where the District advertises its job openings. This notice will be available on the Office of Human Resources Website ([Career/Job Opportunities \(napavalley.edu\)](http://napavalley.edu/Career/JobOpportunities)) and will be sent by both postal mail and email.

The District will actively seek to reach those institutions, organizations, and agencies that may be recruitment sources. For example, the District may send an annual written notice concerning the Plan to the following organizations:

- California Human Development (CHD)
- Catholic Charities
- Child Start, Inc.
- Community Health Clinic Olé
- Community Resources for Independence
- COPE Family Center
- Department of Rehabilitation
- Fairfield-Suisun Adult School
- North Bay Regional Center
- NAACP-Vallejo Chapter
- Napa County Hispanic Network
- Napa County Regional Occupational Program
- Napa County Job Connection
- Napa Valley Adult School
- Napa Valley Economic Development
- Napa Valley Unified School District-Migrant Education
- Solano County Office of Education
- Solano Economic Development Corporation (SEDC)
- Solano Employment Connection
- Sonoma County Job Link
- Sonoma Valley Adult School
- Suscol Inter-Tribal Council
- Vacaville Adult School
- Vallejo Adult School
- And other professional organizations

Component 10: Process For Gathering Information And Periodic Longitudinal Analysis of District Workforce and Applicant Pool

References: CCR, Title 5, §§53003(c)(8), 53004, and 53006

The district has compared staffing demographics for the past three years. (See Appendix B). The data is representative of how the financial circumstances have affected staffing and recruitment. The district has offered two early retirement incentives and layoffs in the past three years. The reduction in staffing has impacted the diversity of our employment base. During the past three years, the focus has been to recruit for critical positions and to perform nationwide and local searches with focus recruitment strategies to address the decline in monitored groups on our campus.

EEO DATA COLLECTION

The District allows applicants and employees to identify their gender (including non-binary options), ethnic group identification, and, if applicable, their disability status in a manner prescribed by the Chancellor and consistent with state and federal law ("EEO data"). The District will keep EEO data confidential and shall use it only in research, monitoring, evaluating the effectiveness of the District's EEO program or another similar purpose authorized by law. Individuals serving on a screening or selection committee will not have access to applicants' EEO data during their participation on the committee. Following such participation on a selection or screening committee, only District employees whose job duties require them to have access to such data will have such access, unless otherwise required by law.

The District allows applicants and employees to provide the following Monitored Group information:

1. Gender Identification

The District requests that employees and applicants self-identify as female, male, or non-binary.

2. Race and Ethnicity Identification

The District requests that employees and applicants self-identify into the following ethnicity categories:

- a. Hispanic or Latino - A person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin regardless of race.
- b. White (Not Hispanic or Latino) - A person having origins in any of the original people of Europe, the Middle East, or North Africa.
- c. Black or African American (Not Hispanic or Latino) - A person having origins in any of the black racial groups of Africa.
- d. Native Hawaiian or Other Pacific Islander (Not Hispanic or Latino) - A person having origins in any of the peoples of Hawaii, Guam, Samoa, or

other Pacific Islands.

- e. Asian (Not Hispanic or Latino) - A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian Subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
 - f. American Indian or Alaska Native (Not Hispanic or Latino) - A person having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.
 - g. Two or More Races - All persons who identify with more than one of the above five races (White, Black or African American, Native Hawaiian or Other Pacific Islander, Asian, American Indian or Alaska Native). For the purposes of this group, identifying as Hispanic or Latino and only one of the listed 5 race groups does NOT qualify under this category.
3. Disability Identification
- The District requests that all employees self-identify their disability status, if any, by using the following definition, consistent with the Fair Employment and Housing Act:
- a. "Disabled person"
Any person who (1) has a physical or mental impairment which limits one or more of such person's major life activities, (2) has a record of such impairment, or (3) is regarded as having such impairment.
 - b. "Major life activities"
Functions such as caring for one's self, performing manual tasks, walking, seeing, hearing, talking, breathing, learning, and working.

EEO DATA COLLECTION MONITORED GROUP IDENTIFICATION ISSUE

There may be significant numbers of employees or applications who decline to identify their gender, ethnicity, or disability status with the District. The District shall make an effort to accurately capture this information and encourages all persons to provide the above data. The District understands that employees and applicants voluntarily submit EEO data and will not require employees or applicants to respond.

[Human Resources \(napavalley.edu\)](http://napavalley.edu)

LONGITUDINAL ANALYSIS TO IDENTIFY ADVERSE IMPACT

Once the District gathers the EEO information described above, the District's Human Resources Department will assign every employee and applicant to one of the seven job categories identified in Plan Component 2. The District will also include data for employees and applicants that allows the District to track the composition and diversity of who is hired and retained over time, disaggregated by college, discipline, job category,

and other relevant measures. (See Appendix B.)

The District will then conduct a periodic, longitudinal analysis of employees and applicants, broken down by number of persons from monitored group status in each job category to determine whether additional diversification measures are required. Specifically, the District will compare the composition of initial applicant pools, qualified pools, and applicants recommended for interview to identify any adverse impact of the District's pre-hiring and hiring strategies, which exists where the selection rate for a monitored group is less than four-fifths (or 80%) of the selection rate for the group with the highest rate.

The District will use the EEO data to identify adverse impacts as a result of any of the following to make improvements to reduce adverse impacts: a) minimum and desired qualifications that may create barriers b) advertising and recruitment strategies c) selection processes d) onboarding and orientation processes and m

DISTRICT STRATEGIES TO MITIGATE IDENTIFIED ADVERSE IMPACT

If the EEO Officer determines that any selection technique or procedure has adversely impacted any monitored group, the EEO Officer will advise the Superintendent/President, and the Superintendent/President may do the following:

1. Suspend the selection process and take timely and effective steps to remedy the problem before the selection process resumes.
2. When appropriate, assist the screening committee by discussing the overall composition of the applicant pool and the screening criteria or procedures which may have produced an adverse impact, provided that confidential information about individual candidates is not disclosed.
3. Where necessary, extend recruitment or reopen the recruitment and reinitiate the selection process designed to avoid adverse impact.

When the District identifies an adverse impact in its longitudinal analysis, the District shall take the following steps:

1. Review the longitudinal hiring process analyses results for potential adverse impact affecting the identified monitored group at any phase(s) of the hiring process or employment.
2. Conduct additional quantitative analyses of phases where the District identifies adverse impact to determine, where possible, the specific elements of the hiring process or employment stage creating an adverse impact.
3. Review the identified hiring process elements or employment stage contributing to the adverse impact to determine whether they can be modified, eliminated, or replaced with a procedure that can decrease the adverse impact.
4. Consider the implementation of additional measures designed to promote diversity

in the hiring process and employment.

5. Analyze retention of monitored group employees in the impacted area and other employment processes that impact the District's ability to attract and retain a diverse workforce.
6. Present the findings to the EEO Advisory Committee, and other relevant stakeholder groups to identify other potential good faith efforts to make positive progress towards eliminating the adverse impact.

Component 11: Process for Utilizing Data to Determine Whether Monitored Groups are Underrepresented Within District Job Categories

References: CCR, Title 5, §§53003(c)(9), and 53006

In conjunction with EEO data gathered pursuant to Plan Component 10, the District shall identify and utilize data available from reliable public and private sources to determine whether monitored groups are underrepresented within District job categories, as defined in Plan Component 2.

DATA COLLECTION

The District shall utilize data available from reliable public and private sources, including but not limited to Management Information Systems (MIS), Employee and Employee Assignment Files, California Community College Chancellor Office Data Mart, and data from NeoGov for this analysis.

ANALYSIS TO IDENTIFY UNDERREPRESENTATION

Once the District gathers the EEO data described in Component 10 and the data from public and private sources described in this Plan Component, and assigns every employee and applicant to one of the seven job categories identified in Plan Component 2, the District will then review the EEO data of its employees, broken down by number of persons from monitored group status in each job category.

The District will then analyze this employee EEO data to compare the percent of a monitored group in a job category with their projected representation. Representation below 80% constitutes underrepresentation.

The District will use this data to review all strategies regarding recruitment, selection and orientation for the purpose of creating improvements to reduced underrepresentation.

Plan Component 12: Methods to Address Underrepresentation

References: CCR, Title 5, §53003(c)(10)

Title 5, Section 53003(c)(10) requires the Plan to identify strategies for addressing any underrepresentation identified pursuant to Section 53003(c)(9) and Plan Component 11. The EEO Officer is responsible for developing appropriate measures for addressing findings of underrepresentation.

The District will not designate or set aside particular positions to be filled by members of any group defined in terms of race, religious creed, color, national origin, ancestry, physical disability, mental disability, medical condition, genetic information, marital status, sex, gender, gender identity, gender expression, age, sexual orientation, or veteran or military status. The District also will not engage in any other practice that would result in discriminatory or preferential treatment prohibited by state or federal law. The District will not apply the Plan in a rigid manner that has the purpose or effect of so discriminating.

The District will review the pattern of its hiring decisions over time, and if it determines that those patterns do not achieve the objectives of the Plan, the District will request the EEO Advisory Committee to recommend new methods to achieve the Plan objectives, or if necessary, to modify the Plan itself to ensure equity, inclusion, and equal employment opportunity.

In order to address these instances of underrepresentation, as defined above, the District will take the following steps:

1. The District will request that the EEO Opportunity Advisory Committee, in conjunction with appropriate Human Resources staff, review the District's recruitment procedures and make recommendations on modifications that would address the underrepresentation.
2. The District will review its advertising and recruitment budget on a regular basis and make recommendations if needed to ensure that recruitment is broad and inclusive.

Plan Component 13: Process for Developing and Implementing Strategies that Promote Diversity

References: CCR, Title 5, §§53003(c)(1)-(2) and 53024.1

1. The District is responsible for developing and implementing strategies designed to promote the diversity of its workforce at all levels and demonstrate the District's institutional commitment to diversity.

The Office of Human Resources will provide demographic data that is disaggregated by department/division to the responsible administrator for the division or department where the underrepresentation occurs, in conjunction with the EEO officer, to create a recruitment and hiring action plan to assist in addressing the underrepresentation.

The action plan will include, but is not limited to:

- a. Identify additional locations or resources (job boards, professional organizations, educational organizations, list serves, etc.) to advertise positions that would likely attract applicants from the underrepresented groups;
- b. Promotion of campus employee and student demographics and highlight campus culture that supports a diversity, equity, inclusivity and accessibility that would assist in attracting applicants from underrepresented groups;
- c. Showcase professional opportunities that are offered both within the Academic Senate and the Office of Human Resources Training and Development for current faculty and staff on the value of a diverse workforce;
- d. Consider changes to the job posting, eliminating cover letters if possible, reevaluating screening criteria by eliminating preferred qualifications, review of interview questions for applicability to position only, which may reasonably be expected to attract applicants from underrepresented groups.
- e. Review the use of any locally established minimum qualification to determine if it is job-related and consistent with business necessity in compliance with federal and state laws.
- f. Discontinue the use of any locally established minimum qualification that is found to not satisfy the requirements set forth above.

Additional strategies identified by Appendix A.

The Office of Human Resources will utilize the action plan in creating a recruitment plan and timeline. The Office of Human Resources will review data within the applicant pools

to determine if additional approaches are necessary in the effort to address underrepresentation.

1. All initial applications shall be screened to determine which candidates satisfy the job specifications. The candidates who meet the job specifications shall constitute the “qualified pool”.
2. The District shall conduct an initial demographic review of the qualified applicant pool before the application deadline for a position closes. If the pool’s candidate diversity is not consistent with the diversity goals of the EEO Plan, the district may extend the search period.
3. The composition of the qualified applicant pool shall be reviewed and compared to the composition of the initial applicant pool. If the EEO Officer or designee finds that the composition of the qualified applicant pool may have been influenced by factors that are not job related, appropriate action shall be taken. This applicant pool data shall be reviewed in conducting the analysis described in Title V Section 53006(a)

The District recognizes that multiple approaches are appropriate to fulfill its mission of ensuring equal employment opportunity and the creation of a diverse workforce. The District will continue to assess its culture and implement initiatives that support a welcoming environment. The EEO Advisory Committee will continue to sponsor and support events, training, or other activities that promote equal employment opportunity, nondiscrimination, retention, and diversity.

Appendix A

	A	B	C	D
1	IMPLEMENTATION	WHO	WHAT/WHEN (Describe strategy here)	EFFECTIVENESS METRICS AND REVIEW
2	PRE-HIRING			
3	Provide consist and ongoing training to employees, students & trustees	1. Vice President of HR/EEO Officer or designee 2) Recruiter will be responsible for tracking attendance.	2023-2024: (1) Provide workshops on successful application practices and interviewing skills to applicants from diverse backgrounds; (2) Offer Selection committee training four times over the academic year and EEO representative training twice year (3) Offer Selection/EEO Committee training during the flex days in both Fall and Spring. (4) Offer Selection Committte training as part of our offering of online trainings.	1. Accessible and timely selection and EEO committee trainings.
4	Establish an EEO & Diversity online presence on the District's website	Vice President of HR/EEO Officer or designee	2023-2024: Establish an "Equal Employment Opportunity and Diversity" online presence by highlighting the District's diversity and equal employment opportunity, ADA, sexual harassment and nondiscrimination policies, procedures and programs on the District's website. The website will also list contact persons for further information on all of these topics.	1. Provide a location to find resources for Selection committees, EEO Reps and Hiring Managers 2. Accesible information for all employees of the District regarding EEO, ADA, Sexual Harassment, etc.
5	Review and update District EEO/DEI policy statement	Vice President of HR/EEO Officer or designee	2023-2024: Ensure that current legal language update BP/AP	Update to date BP/AP to reflect current recruitment processes for the District
6	Remove the requirement of Cover Letters for Facilities positions	Vice President of HR/EEO Officer or designee	2023-2024: Only require completed application and resume for facilities positions to remove a possible barrier to employment.	Increase diversity in applicant pools by removing a barrier to employment
7	Build additional partnerships with other educational organizations and professional organizations	Vice President of HR/EEO Officer or designee	2023-2024: Develop a pipeline with other colleges and universities programs, such a graduate programs, to increase the diversity in our applicant pools	Increase diversity in applicant pools

8	IMPLEMENTATION	WHO	WHAT/WHEN*(Describe strategy here)	EFFECTIVENESS METRICS AND REVIEW
9	HIRING			
10	Focused outreach and publications.	Vice President of HR/EEO Officer or designee	2023-2024: Advertise faculty and administrative vacancies in diversity publications, including but not limited to: Latino/Hispanics in Higher Education, Black/African Americans in Higher Education, and Asian American/Pacific Islanders in Higher Education.	Increase diversity in applicant pools and build the Napa Valley College brand as an employer that honors DEIA
11	Convey in job announcements the district's commitment to diversity & EEO.	Vice President of HR/EEO Officer or designee	2023-2024: Highlight the District's equal employment opportunity and diversity policies in job announcements and in its recruitment, marketing, and other publications.	Increase diversity in applicant pools and build the Napa Valley College brand as an employer that honors DEIA
12	Develop and contact new recruitment sources that include diverse pools of candidates.	Vice President of HR/EEO Officer or designee	2023-2024: Seek direct contact with student, professional, community, and other organizations that represent the diverse community we serve. These organizations can serve as resources for referring potential candidates.	Increase diversity in applicant pools
13	Maintain updated job descriptions and job announcements.	Vice President of HR/EEO Officer or designee	2023-2024: Recognize multilingualism and knowledge of multiculturalism as a desired qualification, and when appropriate, as a required skill and qualification for community college employees.	Provide accurate scope of responsibilities with minimum and desired qualifications that do not create barriers and limit the diversity in the applicant pools.
14	Board of trustees receives training on elimination of bias in hiring and employment at least once every election cycle.	Vice President of HR/EEO Officer or designee	2023-2024: Provide training on how implicit bias affects decision making in the recruitment process	Limit adverse impact on final hiring decisions/approvals made by the board of trustees
15	Assess "sensitivity to diversity" of all applicants.	Vice President of HR/EEO Officer or designee	2023-2024: (1) Ensure that all administrators support diversity priorities as identified by the DEI Committee; (2) Investigate integrating the understanding of diversity into the evaluation of employees.	Create a campus environment that understand and supports DEIA initiatives within the roles they hold.
16	Dedication of specified staff to EEO.	Vice President of HR/EEO Officer or designee	2023-2024: (1)Ensure that the equal employment opportunity officer position is maintained as a cabinet or other high-level administrative position. (2)Dedicated team of EEO reps to serve on selection committees	Ensure there is an EEO representative present at all selection committee meetings. The District EEO Officer is currently a member of the cabinet and will continue to serve.
17	Implement Blind Recruitment	Recruiter	2023-2024: Limit access to information identifying or suggesting an individual's gender, race or ethnicity	Limit adverse impact on hiring results

18	IMPLEMENTATION	WHO	WHAT/WHEN (Describe strategy here)	EFFECTIVENESS METRICS AND REVIEW
19	POST-HIRING			
20	Professional development, mentoring, support and leadership opportunities for all staff and new employees.	Vice President of HR/EEO Officer or designee	2023-2024: Create professional development programs for all staff and new employees that creates support, DEIA learning and orientation. The programs will address the specific needs of each constituent group and will be aligned with the mission and vision of the college	Increased student support, improved performance and shared knowledge of DEIA commitments
21	Survey applicants who decline offers & use the information.	Vice President of HR/EEO Officer or designee	2023-2024: Review the data from declined offers with the intention of addressing adverse impacts in the recruitment process.	Improved recruitment process, salary structure (if possible), hiring incentives.
22	Describe strategies developed to address any adverse impact identified in the process of carrying out the requirements of Component 10 of the EEO Plan	Vice President of HR/EEO Officer or designee and Research and Planning	2023-2024: Collect and compile data annually and review it with the EEOAC, cabinet and Board of Trustees with the purpose of identifying adverse impact in the data.	Create an annual review process of compiled data to review with the EEOAC, Cabinet and the Board.
23	Describe strategies developed to address any underrepresentation identified in the process of carrying out the requirements of Components 11 & 12 of the EEO Plan	Vice President of HR/EEO Officer or designee	2023-2024: Work with EEOAC to develop ways to address underrepresentation by working with departments/divisions and identifying additional outreach in which the college can build pipelines to address the underrepresentation in the respective areas.	Reduction of underrepresentation over a period of time.

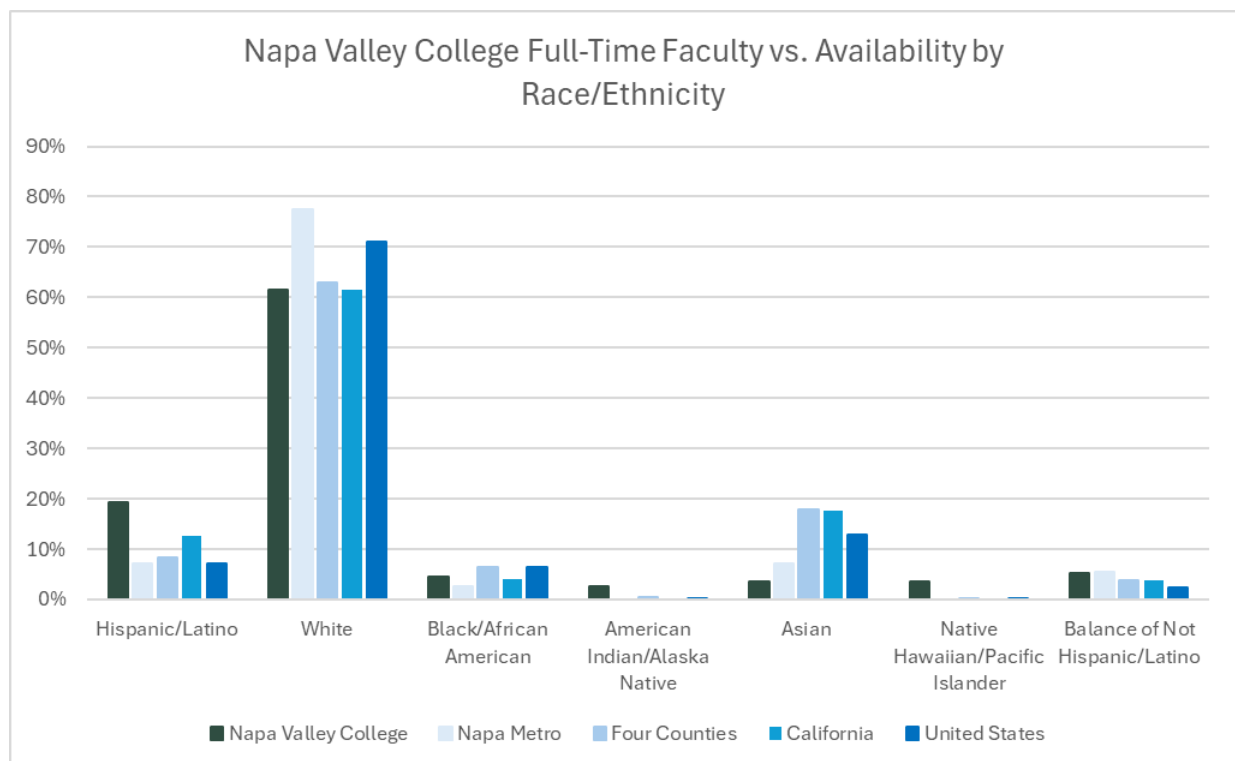
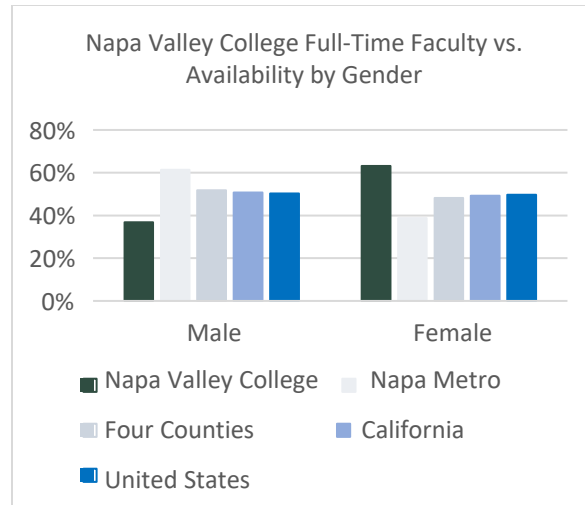
Appendix B

NVC Full-Time Faculty Employees Versus Postsecondary Teachers Availability Estimates

	2020	2014-2018			
	Napa Valley College (Full-Time Faculty Employees)	Napa, CA Metro Area	Four Counties (Napa, Solano, Alameda, Sacramento)	California	United States
N	114	555	18,630	159,470	1,470,810
Gender Availability Estimates					
Male	36.8%	61.3%	51.8%	50.8%	50.3%
Female	63.2%	38.7%	48.2%	49.2%	49.7%
Race/Ethnicity Availability Estimates					
Hispanic/Latino	19.3%	7.2%	8.3%	12.5%	7.1%
White Alone	61.4%	77.5%	62.9%	61.6%	71.0%
Black/African American Alone	4.4%	2.7%	6.4%	4.1%	6.4%
American Indian/Alaska Native Alone	2.6%	0.0%	0.4%	0.2%	0.3%
Asian Alone	3.5%	7.2%	17.9%	17.7%	12.8%
Native Hawaiian/Pacific Islander Alone	3.5%	0.0%	0.2%	0.1%	0.1%
Balance of Not Hispanic/Latino	5.3%	5.4%	3.8%	3.8%	2.3%
<i>Sources: U.S. Census Bureau EEO Tabulation Data Tables; Napa Valley College Employee Demographic Data</i>					

Summary of Comparative Analysis: Full-Time Faculty vs. Postsecondary Teachers

	Napa Metro Area	4 Counties & California & United States
NVC Significantly Higher	<ul style="list-style-type: none"> ○ Female ○ Hispanic/Latino ○ American Indian/Alaska Native ○ Native Hawaiian/Pacific Islander 	
NVC Significantly Lower	○ Male	
	○ White	○ Asian

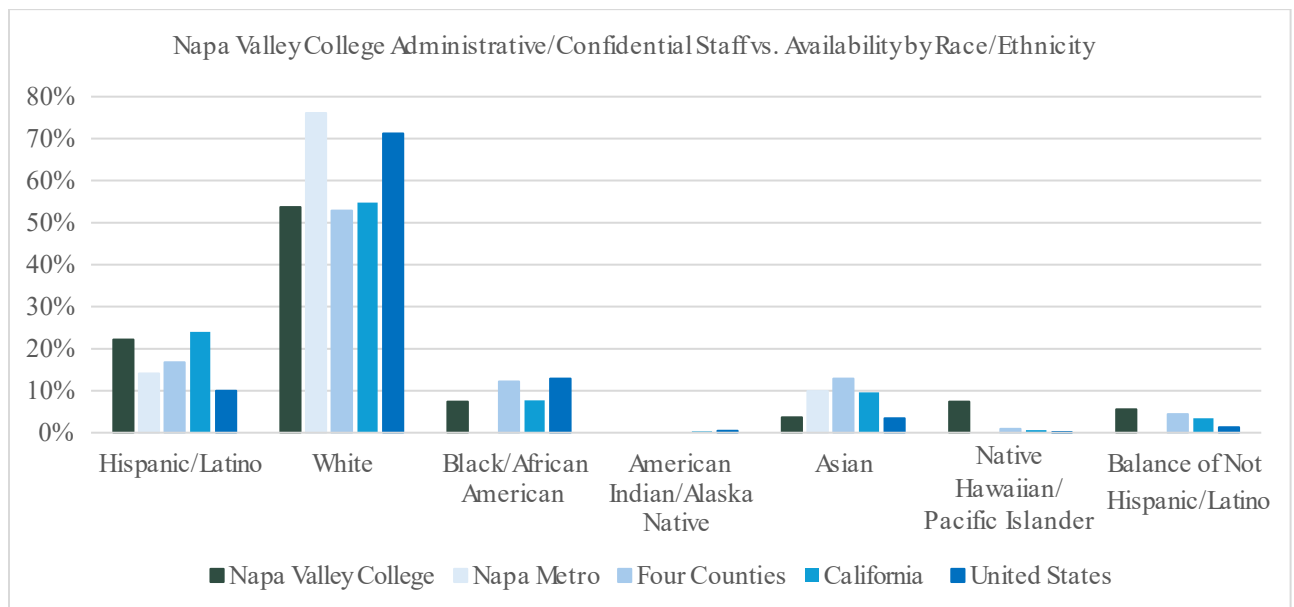
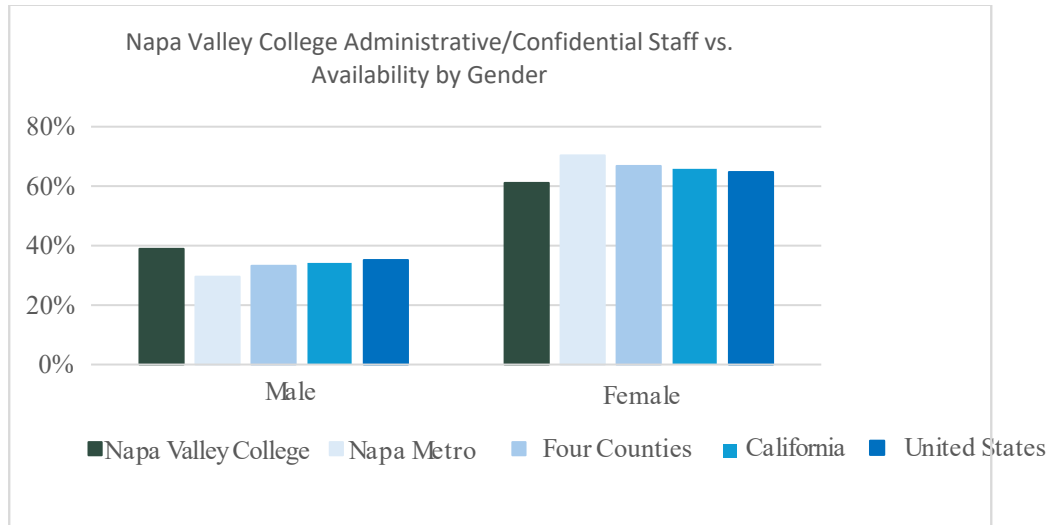


NVC Administrative/Confidential Staff Versus Education Administrators Availability Estimates

	2020	2014-2018			
	Napa Valley College (Administrative & Confidential Staff)	Napa, CA Metro Area ^A	Four Counties (Napa, Solano, Alameda, Sacramento)	California	United States
N	54	355	10,820	107,075	947,345
Gender Availability Estimates					
Male	38.9%	29.6%	33.2%	34.2%	35.2%
Female	61.1%	70.4%	66.8%	65.8%	64.8%
Race/Ethnicity Availability Estimates					
Hispanic/Latino	22.2%	14.1%	16.8%	24.0%	10.0%
White Alone	53.7%	76.1%	52.9%	54.8%	71.2%
Black/African American Alone	7.4%	0.0%	12.2%	7.7%	12.9%
American Indian/Alaska Native Alone	0.0%	0.0%	0.0%	0.3%	0.5%
Asian Alone	3.7%	9.9%	12.9%	9.6%	3.4%
Native Hawaiian/Pacific Islander Alone	7.4%	0.0%	0.9%	0.6%	0.1%
Balance of Not Hispanic/Latino	5.6%	0.0%	4.4%	3.4%	1.3%
^A Napa, CA Metro Area includes "Education and childcare administrators."					
Sources: U.S. Census Bureau EEO Tabulation Data Tables; Napa Valley College Employee Demographic Data					

Summary of Comparative Analysis: Administrative/Confidential Staff vs. Educational Administrators

	Napa Metro Area	4 Counties	California	United States
NVC Significantly Higher	○ Native Hawaiian/Pacific Islander			
	○ Black/ African American			○ Hispanic/Latino
	○ Balance			○ Balance
NVC Significantly Lower	○ White	○ Asian		○ White



NVC Classified Professionals Versus EEO-1 Job Categories* Availability Estimates

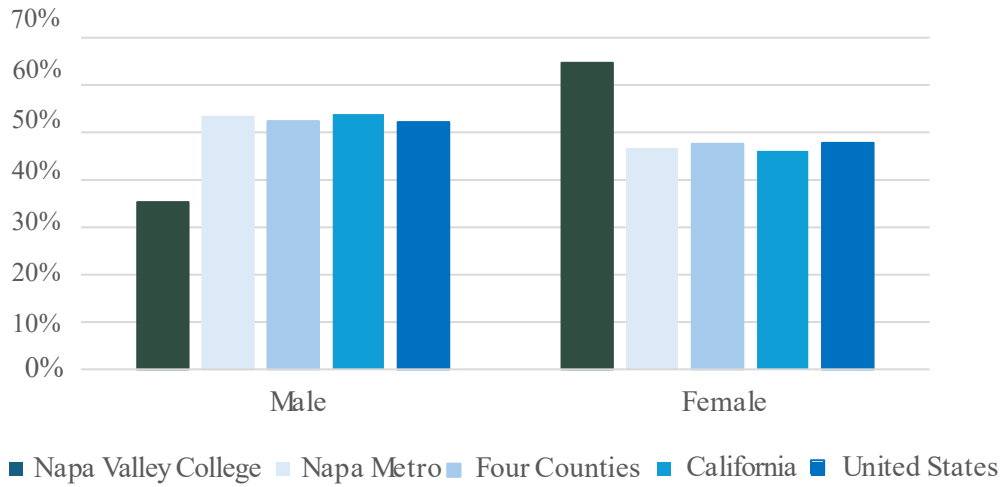
*Includes professionals, technicians, administrative support workers, craft workers, operatives, laborers and helpers, and service workers

	2020	2014-2018			
	Napa Valley College	Napa, CA Metro Area	Four Counties (Napa, Solano, Alameda, Sacramento)	California	United States
N	156	57,765	1,522,400	15,345,465	127,795,220
Gender Availability Estimates					
Male	35.3%	53.3%	52.4%	53.9%	52.2%
Female	64.7%	46.7%	47.6%	46.1%	47.8%
Race/Ethnicity Availability Estimates					
Hispanic/Latino	27.6%	37.4%	23.6%	39.5%	17.9%
White Alone	45.5%	49.5%	38.9%	36.7%	61.3%
Black/African American Alone	3.2%	2.0%	9.6%	5.4%	12.3%
American Indian/Alaska Native Alone	1.3%	0.3%	0.3%	0.3%	0.6%
Asian Alone	5.8%	8.5%	22.5%	15.1%	5.8%
Native Hawaiian/Pacific Islander Alone	4.5%	0.1%	1.0%	0.4%	0.2%
Balance of Not Hispanic/Latino	12.2%	2.3%	4.1%	2.6%	2.0%
<i>Sources: U.S. Census Bureau EEO Tabulation Data Tables; Napa Valley College Employee Demographic Data</i>					

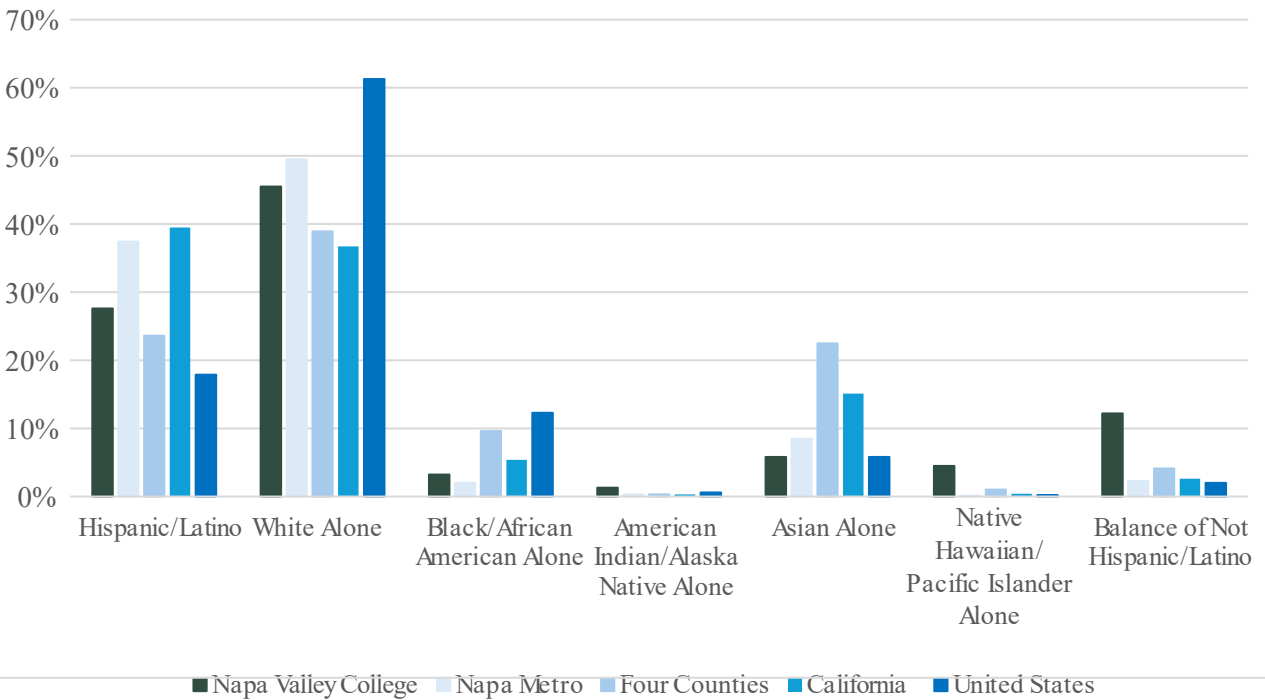
Summary of Comparative Analysis: Classified Professionals vs. EEO-1 Job Categories

	Napa Metro Area	4 Counties	California	United States
NVC Significantly Higher	<ul style="list-style-type: none"> ○ Female ○ Native Hawaiian/Pacific Islander ○ Balance 			
	○ American Indian/Alaska Native	○ American Indian/Alaska Native	○ White ○ American Indian/Alaska Native	○ Hispanic/Latino
NVC Significantly Lower	<ul style="list-style-type: none"> ○ Male 			
	○ Hispanic/Latino	○ Black/African American ○ Asian	○ Hispanic/Latino ○ Asian	○ White ○ Black/African American

Napa Valley College Classified Professionals vs.
Availability by Gender



Napa Valley College Classified Professionals vs. Availability by Race/Ethnicity



Napa Valley College Applicant Pool vs. Availability Estimates among All Employee Groups Combined

	2018-2019 through 2022-2023	2014-2018			
	All Napa Valley College Applicants	Napa Metro Area	Four Counties (Napa, Solano, Alameda, Sacramento)	California	United States
N	Gender: 8,213 Race/Ethnicity: 8,570	58,675	1,551,850	15,612,010	130,213,375
Gender Availability Estimates					
Male	43.1%	53.3%	52.3%	53.8%	52.0%
Female	56.9%	46.7%	47.7%	46.2%	48.0%
Race/Ethnicity Availability Estimates					
Hispanic/Latino	15.2%	37.4%	23.4%	39.1%	17.7%
White Alone	50.3%	49.5%	39.3%	37.1%	61.5%
Black/African American Alone	10.7%	2.0%	9.6%	5.4%	12.2%
American Indian/Alaska Native Alone	1.1%	0.3%	0.3%	0.3%	0.6%
Asian Alone	9.3%	8.5%	22.4%	15.1%	5.8%
Native Hawaiian/Pacific Islander Alone	5.6%	0.1%	1.0%	0.4%	0.2%
Balance of Not Hispanic/Latino	7.8%	2.3%	4.1%	2.7%	2.0%

Summary of Comparative Analysis: Napa Valley College Applicant Pool Versus Availability Estimates

	Napa Metro Area	4 Counties	California	United States
NVC Significantly Higher	<ul style="list-style-type: none"> ○ Female ○ American Indian/Alaska Native ○ Native Hawaiian/Pacific Islander ○ Balance 			
	<ul style="list-style-type: none"> ○ Black/African American ○ Asian 	<ul style="list-style-type: none"> ○ White ○ Black/African American 	<ul style="list-style-type: none"> ○ White ○ Black/African American 	<ul style="list-style-type: none"> ○ Asian
NVC Significantly Lower	<ul style="list-style-type: none"> ○ Male ○ Hispanic/Latino 			
		<ul style="list-style-type: none"> ○ Asian 	<ul style="list-style-type: none"> ○ Asian 	<ul style="list-style-type: none"> ○ White ○ Black/African American