

AFFIRMATIVE ACTION PROGRAM
FOR
INDIVIDUALS WITH DISABILITIES

Gateway Technical College

3520 30th Avenue
Kenosha, WI 53144



AFFIRMATIVE ACTION PROGRAM FOR INDIVIDUALS WITH DISABILITIES

Contractor : Gateway Technical College
3520 30th Avenue
Kenosha, WI 53144

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3520 30th Avenue
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EQUAL EMPLOYMENT OPPORTUNITY POLICY

41 CFR Section 60-741.44(a)

It is the policy at Gateway Technical College to provide equal employment and advancement opportunities to all qualified individuals. To achieve this goal, Gateway Technical College is dedicated to taking affirmative action to employ and advance in employment individuals with disabilities. All personnel actions, including compensation, benefits, recruitment, hiring, training, and promotion of persons in all job titles, are administered without regard to disability status, and all employment decisions are based solely on valid job requirements. In addition, employees and applicants are protected from harassment, threats, coercion, intimidation, or discrimination for:

- 1) Filing a complaint;
- 2) Assisting or participating in an investigation, compliance review, hearing, or any other activity related to the administration of Section 503, or any other federal, state, or local law requiring equal opportunity for individuals with disabilities;
- 3) Opposing any act or practice made unlawful by Section 503 or any other federal, state or local law requiring equal opportunity for individuals with disabilities; or
- 4) Exercising any other right protected by Section 503 or its implementing regulations.

This EEO policy has the full support of Bryan Albrecht, President and CEO, who has assigned responsibility for its implementation to Josh Vollendorf, MS, MSE, CHRS, Compliance Manager and Affirmative Action Officer. Gateway Technical College has designed and implemented an audit and reporting system to monitor and maintain its compliance with the Acts.

A copy of the Equal Employment Opportunity statement that reaffirms Gateway Technical College's commitment to individuals with disabilities is posted in a form that is accessible and understandable to an individual with a disability.

REVIEW OF PERSONNEL PROCESSES

41 CFR Section 60-741.44(b)

Gateway Technical College reviews its employment procedures to ensure careful, thorough, and systematic consideration of the job qualifications of applicants and employees with disabilities for job vacancies filled either by hiring or promotion, and for all training opportunities offered or available. This review ensures that personnel procedures do not stereotype individuals with disabilities in a manner that limits their access to all jobs for which they are qualified. Applicants and employees with disabilities have equal access to personnel processes, including those implemented through information and communication technologies. Gateway Technical College periodically reviews its processes, and makes any necessary modifications to ensure its affirmative action obligations are carried out.

The following are some procedures that may be used to facilitate the review and evaluative process:

- 1) The application or personnel form of each applicant with a disability is annotated to identify each vacancy for which the applicant was considered, and is retrievable for review for use in investigations and internal compliance activities;
- 2) The application or personnel form of each applicant with a disability includes the identification of each promotion and training program for which that employee was considered;
- 3) When an employee or applicant with a disability is rejected for employment, promotion, or training, a statement of the reason is appended to the personnel file along with a description of any reasonable accommodation considered; and
- 4) When an employee or applicant is selected for hire, promotion, or training, and reasonable accommodation has been undertaken to enable the selection of an employee or applicant with a disability, the applicant form or personnel record contains a description of the reasonable accommodation.

PHYSICAL AND MENTAL QUALIFICATIONS

41 CFR Section 60-741.44(c)

Gateway Technical College reviews all physical and mental job qualification requirements as openings occur to ensure, to the extent that qualification requirements tend to screen out qualified individuals with disabilities, that they are job-related and consistent with business necessity and the safe performance of the job.

To the extent that physical or mental job qualification requirements tend to screen out qualified individuals with disabilities in the selection of employees or applicants for employment or other changes in employment status such as promotion or training, Gateway Technical College assures that the requirements are related to the specific job(s) for which the individual is being considered, and are consistent with business necessity and the safe performance of the job.

REASONABLE ACCOMMODATION

41 CFR Section 60-741.44(d)

Gateway Technical College makes reasonable accommodations to the physical and mental limitations of employees or applicants to the extent that such accommodations do not impose an undue hardship on the conduct of its business. When an employee with a known disability has significant difficulty performing his or her job, and it is reasonable to conclude that the performance problem may be related to the known disability, the employee is confidentially notified of the performance problem, and asked if the problem is related to the disability. If the employee indicates that the performance problem is related to his or her disability, the employee is asked if reasonable accommodation is needed.

HARASSMENT
41 CFR Section 60-741.44(e)

Gateway Technical College develops and maintains procedures to ensure that its employees are not harassed on the basis of disability.

EXTERNAL DISSEMINATION OF POLICY

41 CFR Section 60-741.44(f)

Gateway Technical College undertakes appropriate outreach and positive recruitment activities that are reasonably designed to effectively recruit individuals with disabilities, such as the following:

1) Gateway Technical College incorporates the Equal Opportunity Clause regarding individuals with disabilities in its purchase orders, leases, and contracts as required by law, executive order, and regulation.

2) Gateway Technical College notifies all applicants of the EEO policy, and invites them to self-identify. Application forms state Gateway Technical College's commitment to equal employment opportunity. All employment advertisements and notices to recruitment sources state this EEO policy.

3) Outreach and recruitment activities that may be undertaken as needed by Gateway Technical College include enlisting the assistance and support of the following persons and organizations in recruiting, and developing on-the-job training opportunities for individuals with disabilities, in order to fulfill its commitment to provide equal employment opportunity for such individuals:

- The State Vocational Rehabilitation Service Agency (SVRA), State mental health agency, or State developmental disability agency in the area of the contractor's establishment;

- The Employment One-Stop Career Center (One-Stop) or American Job Center nearest the contractor's establishment;

- The Department of Veterans Affairs Regional Office nearest the contractor's establishment (www.va.gov);

- Entities funded by the Department of Labor that provide recruitment or training services for individuals with disabilities, such as the services currently provided through the Employer Assistance and Resource Network (EARN) (www.earnworks.com);

- Local Employment Network (EN) organizations (other than the contractor, if the contractor is an EN) listed in the Social Security Administration's Ticket to Work Employment Network Directory (www.yourtickettowork.com/endir);

- Local disability groups, organizations, or Centers for Independent Living (CIL) near the contractor's establishment;

- Placement or career offices of educational institutions that specialize in the placement of individuals with disabilities; and

- Private recruitment sources, such as professional organizations or employment placement services that specialize in the placement of individuals with disabilities.

4) Formal briefing sessions and facility tours may be conducted with representatives from recruiting sources to explain current and future job openings, position descriptions, worker specifications, and the selection process. Follow-up with these resources, and feedback on disposition of applicants are conducted when appropriate.

5) Meaningful contacts are established with organizations for individuals with disabilities for such

purposes as advice, technical assistance, and referral of potential employees. Such assistance may consist of advice concerning proper placement, recruitment, training, and reasonable accommodation.

6) Applicants with known disabilities are considered for all available positions for which they may be qualified.

7) Recruitment programs established with schools incorporate efforts to reach students with disabilities. Efforts may be made to participate in work-study programs with rehabilitation facilities and schools that specialize in training or educating individuals with disabilities.

8) Efforts are made to include individuals with disabilities when employees are pictured in consumer, promotional, or help wanted advertisements.

ASSESSMENT OF EXTERNAL OUTREACH AND RECRUITMENT EFFORTS

41 CFR Section 60-741.44(f)(3)

Gateway Technical College each year reviews the outreach and recruitment efforts it has taken over the previous twelve months to evaluate their effectiveness in identifying and recruiting qualified individuals with disabilities. Each evaluation is documented, including at a minimum the criteria used to evaluate the effectiveness of each effort and the conclusion as to whether each effort and the totality of the efforts are effective. Among these criteria are the Data Collection Analysis for the current year and the two most recent previous years. If Gateway Technical College concludes the totality of its efforts are not effective in identifying and recruiting qualified individuals with disabilities, alternative outreach and recruitment efforts are identified and implemented.

Gateway Technical College concludes that each and the totality of its efforts are effective in identifying and recruiting qualified individuals with disabilities.

INTERNAL DISSEMINATION OF POLICY

41 CFR Section 60-741.44(g)

Gateway Technical College has developed the following internal procedures to communicate its obligation to engage in affirmative action efforts to employ and advance in employment qualified individuals with disabilities. These procedures are designed to foster understanding, acceptance, and support among executive, management, supervisory, and other employees, and to encourage such persons to take the necessary actions to meet this obligation.

- 1) Gateway Technical College Notices. The EEO policy statement is included in a policy manual and/or posted on the employee bulletin board and/or electronically in a manner and place that ensures that individuals with disabilities are informed of its contents.
- 2) Union Contracts. A non-discrimination clause is included in any union contracts and any such contracts are reviewed to ensure that they are non-discriminatory. Gateway Technical College notifies union officials and/or employee representatives of the contractor's policy, and requests their cooperation.
- 3) Other procedures that may be implemented as needed:
 - a. Gateway Technical College's overall commitment, top-level management support, and implementation of the plan are discussed with management personnel, making clear the chief executive officer's support for the affirmative action policy;
 - b. All employees and prospective employees are informed of Gateway Technical College's commitment to engage in affirmative action to increase employment opportunities for individuals with disabilities;
 - c. Gateway Technical College's affirmative action policy is publicized in the company newspaper, magazine, annual report, and other media;
 - d. The policy is discussed thoroughly in both employee orientation and management training programs;
 - e. When employees are featured in employee handbooks or similar publications for employees, Gateway Technical College includes individuals with disabilities.

AUDIT & REPORTING SYSTEM

41 CFR Section 60-741.44(h)

Gateway Technical College has designed, implemented, and documented an audit and reporting system that:

- 1) Measures the effectiveness of the affirmative action program.
- 2) Indicates any need for remedial action.
- 3) Determines the degree to which the objectives have been attained.
- 4) Determines whether individuals with known disabilities have the opportunity to participate in all company sponsored educational, training, recreational, and social activities.
- 5) Measures compliance with the affirmative action program's specific obligations.

Where the affirmative action program is found to be deficient, corrective action is taken to bring the program into compliance.

RESPONSIBILITY FOR IMPLEMENTATION

41 CFR Section 60-741.44(i)

Josh Vollendorf, MS, MSE, CHRS has been designated to direct the activities of the affirmative action program. Josh Vollendorf, MS, MSE, CHRS has the full support of Bryan Albrecht in carrying out the Gateway Technical College affirmative action policy. Josh Vollendorf, MS, MSE, CHRS is responsible for:

- 1) Developing policy statements, affirmative action programs, and internal and external communication to include discussions with managers, supervisors, and employees to ensure the policies are followed;
- 2) Advising managers and supervisors that their work performance is evaluated, in part, on the basis of their affirmative action efforts;
- 3) Identifying and discussing with management any problem areas;
- 4) Developing with management solutions for any identified problem areas;
- 5) Serving as a liaison between Gateway Technical College and community groups, governmental agencies, and vocational rehabilitation organizations;
- 6) Maintaining an audit and reporting system to monitor the progress of the affirmative action program;
- 7) Informing management of the latest developments in the affirmative action and equal employment opportunity area;
- 8) Serving as a liaison between Gateway Technical College and organizations for individuals with disabilities;
- 9) Assisting in career counseling for employees with disabilities;
- 10) Ensuring that the policy statement and required posters are posted on bulletin boards and/or electronic postings; and
- 11) Ensuring that employees placed through these policies are not harassed.

TRAINING
41 CFR Section 60-741.44(j)

All personnel involved in recruitment, screening, selection, promotion, discipline, and related processes are trained to ensure the implementation of our commitments made in this affirmative action program.

DATA COLLECTION ANALYSIS

41 CFR Section 60-741.44(k)

Gateway Technical College documents the following computations or comparisons pertaining to applicants and hires on an annual basis, and maintains them for a period of three (3) years:

- 1) The number of applicants who self-identified as individuals with disabilities pursuant to § 60-741.42(a), or who are otherwise known to be individuals with disabilities;
- 2) The total number of job openings and total number of jobs filled;
- 3) The total number of applicants for all jobs;
- 4) The number of applicants with disabilities hired; and
- 5) The total number of applicants hired.

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Data Collection Analysis

(Total Workforce)

06/01/2018 - 05/31/2019

Applicants	Applicant Ratio	Hires & Promotions	Hire & Promo Ratio	Total Openings	Total Jobs Filled	Jobs Filled Ratio
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Total Workforce							
	Disabled	0	0.0%	2	2.2%		
	Total	898		91		91	100.0%

The Company has used the terminology in this report in an effort to comply with governmental affirmative action regulations and has prepared these statistics in compliance with such regulations. They have no legal or factual significance outside the context of this Affirmative Action Program and in no way suggest any wrong doing by the Company.

UTILIZATION GOALS FOR INDIVIDUALS WITH DISABILITIES

41 CFR Section 60-741.45

The OFCCP establishes a utilization goal for employment of qualified Individuals with disabilities for each job group in the contractor's workforce, or for the contractor's entire workforce where the workforce consists of 100 or less employees. The utilization goal is not a rigid and inflexible quota that must be met, nor is it to be considered either a ceiling or a floor for the employment of particular groups. The purpose of the utilization goal is to establish a benchmark against which the contractor must measure the representation of individuals within each job group in its workforce, or within the contractor's entire workforce. Gateway Technical College evaluates its utilization of individuals with disabilities in each job group, or in its entire workforce.

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Utilization Summary of Individuals with Disabilities
(By Job Group using the Any Difference Rule)

41 CFR Section 60-741.45

	Employees	Disabled	Disabled Availability %	Disabled Utilization %	Met Goal?
1A : Executive Admin - Executive or Senior Level	8	1	7.0	12.5	Yes
1B : Executive Admin - Manager	41	4	7.0	9.8	Yes
1C : Executive Admin - LL Manager	21	2	7.0	9.5	Yes
2A : Faculty	120	15	7.0	12.5	Yes
2B : Faculty - special	66	6	7.0	9.1	Yes
2C : Faculty - htp	67	2	7.0	3.0	No
3A : Professional - counselor	25	2	7.0	8.0	Yes
3B : Professional - specialist	23	2	7.0	8.7	Yes
3C : Professional - other	14	1	7.0	7.1	Yes
3D : Professional - student support	46	3	7.0	6.5	No
4A : Clerical - AA	46	4	7.0	8.7	Yes
4B : Clerical - Associate	34	7	7.0	20.6	Yes

The Company has used the terms 'Availability' and 'Utilization' herein as referenced by government affirmative action regulations and has selected statistics for these analyses in compliance with such regulations. The use of such terms and statistics does not indicate the Company's agreement that the sources of statistics are the most relevant. The terms have no legal or factual significance outside the context of this Affirmative Action Program and in no way suggest any wrong doing by the Company.

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Utilization Summary of Individuals with Disabilities
(By Job Group using the Any Difference Rule)

41 CFR Section 60-741.45

	Employees	Disabled	Disabled Availability %	Disabled Utilization %	Met Goal?
4C : Clerical - Aid	11	1	7.0	9.1	Yes
5A : Technical - Student support	18	1	7.0	5.6	No
5D : Technical - computer	39	5	7.0	12.8	Yes
7A : Service - custodian	35	1	7.0	2.9	No
7B : Service - mechanic	9	0	7.0	0.0	No

The Company has used the terms 'Availability' and 'Utilization' herein as referenced by government affirmative action regulations and has selected statistics for these analyses in compliance with such regulations. The use of such terms and statistics does not indicate the Company's agreement that the sources of statistics are the most relevant. The terms have no legal or factual significance outside the context of this Affirmative Action Program and in no way suggest any wrong doing by the Company.

IDENTIFICATION OF PROBLEM AREAS

41 CFR Section 60-741.45(e)

When the percentage of individuals with disabilities in one or more job groups, or in our entire workforce if the workforce is 100 or less employees, is less than the utilization goal, Gateway Technical College takes steps to determine whether and where impediments to equal employment opportunity exist. When making this determination, we assess our personnel processes, the effectiveness of our outreach and recruitment efforts, the results of our affirmative action program audit, and any other areas that might affect the success of the affirmative action program.

Gateway Technical College has not found any impediments to equal employment opportunity in our personnel processes, outreach, and recruitment efforts or any other area that might affect the success of our affirmative action program.

ACTION ORIENTED PROGRAMS

41 CFR Section 60-741.45(f)

As needed, Gateway Technical College develops action-oriented programs designed to correct any identified problems areas. These action-oriented programs may include the modification of personnel processes to ensure equal employment opportunity for individuals with disabilities, alternative or additional outreach and recruitment efforts, and/or other actions designed to correct the identified problem areas and attain the established goal.

Gateway Technical College has not identified any problems areas.