



**EQUAL EMPLOYMENT
OPPORTUNITY/AFFIRMATIVE
ACTION PLAN**

Plan year: 10/01/18 – 9/30/19

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Equal Employment Opportunity/Affirmative Action Plan Certification Statement

This certifies that the attached Equal Employment Opportunity/Affirmative Action Plan represents Western Carolina University's commitment to providing equal employment opportunities to applicants and employees without regard of race, religion, color, national origin, sex, age, political affiliation, genetic information, or disability. I attest that Western Carolina University follows the North Carolina Equal Employment Opportunity Policy effective June 1, 2015 along with all applicable federal and state laws governing equal employment opportunities.

INTRODUCTION/UNIVERSITY OVERVIEW

WCU was founded in 1889 to bring higher education and career opportunities to the western region of North Carolina. Western is one of sixteen public institutions of higher education that comprise the North Carolina University system. The campus is situated in Cullowhee, North Carolina in the southwestern corner of the state. Cullowhee is located near the foot of the Great Smoky Mountains, and is approximately 50 miles west of Asheville and approximately 150 miles northeast of Atlanta. The current total permanent employment at Western as of October 1, 2018 is 1,562 (an increase of 40 employees from the previous year and 58 from 2016). Total employment (including adjunct faculty and temporary staff) is currently 1,907 (+79 above 2017). For Fall Semester, 2018, there were 11,639 students enrolled (+605 above 2017 and +834 above 2016) with 18.5% identifying as minority. Currently the total minority workforce representation is 10.2% (increase of 0.4 since 2017 and 2.0% since 2016) and 49.7% are female.

The university recruitment area for faculty and staff varies depending upon the type of vacancy. All recruited positions are advertised with the North Carolina Division of Employment Security and are also posted on the Western Carolina University web page at <https://jobs.wcu.edu>. In addition, at minimum, all Faculty and upper level administrative positions are advertised with HigherEdJobs.com and InsideHigherEd.com. In August 2016, the University became a founding member of the Higher Education Consortium (HERC) of the Carolinas and all positions are posted through the consortium website. Executive and professional positions (including faculty and select positions that require specialized recruitment efforts) are recruited nationally. The primary recruitment area for all other positions is comprised of the four-county region of Jackson, Macon, Haywood, and Transylvania counties.

Statistical Information

The statistical information pertaining to the University's workforce used throughout the Affirmative Action Plan is based on reports generated from a variety of automated files. The data reflects both full-time and part-time employees, and is current as of October 1, 2018.

Teaching Faculty

The permanent full-time teaching faculty of the University during the Fall 2018 semester numbered 542 members (an increase of 9 over Fall 2017) and was recruited nationally. 49.6 percent of the teaching faculty were female (a decrease of 1.4 percent from Fall 2017) and 11.6 percent identified as minority (unchanged from Fall 2017).

Administrators and Professional Staff

The University's executive group (Job Group 100) totaled 56. This group is comprised of 37.5% female (6.6% increase) and 14.3% minority (1.6% increase). Among the professional staff (Job Group 300), 57.1% are women (0.8% decrease) and 12.3% identify as minority (1.4% increase).

Staff

The University employs 607 permanent support staff members (Job Groups 250, 260, 400, 500, 600, 700, and 800). This includes 46.6% female (-1.1%) and 7.3% minority (unchanged from the previous year). Additionally, the University employees adjunct faculty (Job Group 910) and temporary staff (Job Group 920). There are 210 adjunct faculty (+17) comprised of 59.7% female and 7.6% minority (+1.4%). Temporary staff represent 135 employees (+22) of which 51.9% are female (+6.8%) and 12.6% minority (+.02%).

University Mission

Western Carolina University creates learning opportunities that incorporate teaching, research, service, and engagement through on campus, off campus, on-line and international experiences. The university focuses its undergraduate, master's and three doctoral programs, educational outreach, research, creative, and cultural activities to sustain and improve individual lives and enhance economic and community development in Western Carolina and beyond.

Core Values and Guiding Principles

- Excellence, Scholarship, Teaching and Learning
- Collaboration with and Respect for our Communities
- Free and Open Interchange of Ideas
- Responsible Stewardship and Organizational Effectiveness
- Organizational and Environmental Sustainability
- Cultural Diversity and Equal Opportunity

Vision

To be a national model for student learning and engagement that embraces its responsibilities as a regionally engaged university.

THE STATE OF NORTH CAROLINA EEO POLICY

The State of North Carolina recognizes that an effective and efficient government requires the talents, skills and abilities of all qualified and available individuals, and seeks opportunities to promote diversity and inclusion at all occupational levels of State government's workforce through equal employment opportunity (EEO) workforce planning initiatives. The State is committed to ensuring the administration and implementation of all human resources policies, practices and programs are fair and equitable without unlawful discrimination, harassment or retaliation on the basis of race, religion, color, national origin, sex (including pregnancy), age (40 or older), political affiliation, genetic information, or disability, except where age, sex, or physical requirements constitute bona fide occupational qualifications. State agencies, departments and universities shall be accountable for administering all aspects of employment, including hiring, dismissal, compensation, job assignment, classification, promotion, reduction-in-force, training, benefits and any other terms and conditions of employment in accordance with federal and State EEO laws.

See the Unlawful Workplace Harassment policy in Section 1 of the State Human Resources Manual for provisions related to unlawful harassment, including sexual harassment, and retaliation.

Coverage

Individuals protected by provisions of this policy are:

1. current employees;
2. former employees; and
3. job applicants

Veterans

Job discrimination of veterans shall be prohibited and affirmative action shall be undertaken to employ and advance in employment eligible veterans in accordance with Article 13 of G.S. 126 and G.S. 128-15.

See the Veteran's Preference policy in Section 2 of the State Human Resources Manual for provisions related to veteran's preference including the employment and advancement of protected veterans.

Office of Human Resources Responsibilities

The Office of State Human Resources (OSHR) shall:

1. establish the EEO Plan Requirements and Program Guidelines in

accordance with federal and state laws to be followed by all agencies, departments and universities, to ensure commitment to and accountability for equal employment opportunity throughout State government;

2. review, approve and monitor all EEO plans and updates;
3. provide services of EEO technical assistance, training, oversight, monitoring, evaluation, support programs, and reporting to ensure that State government's work force is diverse at all occupational levels;
4. develop and promote EEO programs and best practices to encourage consistent and fair treatment of all State employees;
5. meet with agency heads, department heads, and university chancellors, Human Resources Directors and EEO Directors/Officers annually to discuss the progress made toward reaching program goals; and
6. provide a report annually to the Human Resources Commission and the Governor on the EEO Plans and progress by agencies, departments, universities and state government.

Agency, Department and University Responsibilities:

Each Agency Head, Department Head and University Chancellor shall:

1. adhere to the policies and programs that have been adopted by the State Human Resources Commission and approved by the Governor;
2. ensure the agency, department or university's commitment to EEO is clearly communicated to all employees;
3. ensure that Human Resources policies and employment practices are implemented consistently and fairly;
4. designate an EEO Officer/Director who has access to the agency head, department head or university chancellor to be responsible for the operation and implementation of the EEO Plan;
5. provide the necessary resources to ensure the successful implementation of the EEO Program;
6. ensure each manager and supervisor has, as a part of his or her performance plan, the responsibility to comply with EEO laws and policies, and assist in achieving EEO goals established by the agency, department or university;
7. ensure the EEO Plan is designed in accordance with the EEO Plan Requirements and Program Guidelines as specified by the Office of State

- Human Resources;
8. ensure the EEO Plan is submitted by March 1st of each year to the Office of State Human Resources for review and approval as required by G.S. 126-19;
 9. ensure all employees are made aware of the EEO policy including the Unlawful Workplace Harassment Policy found in Section 1 of the State Human Resources Manual;
 10. develop strategies to prevent unlawful workplace harassment and retaliation in the workplace;
 11. ensure required employee notices describing Federal laws prohibiting job discrimination are posted in work locations where notices to applicants and employees are customarily posted and easily accessible to applicants and employees with disabilities;
 12. maintain records of all complaints and grievances alleging discriminatory practices; and
 13. ensure all newly hired, promoted, or appointed supervisors and managers complete required EEO training in accordance with G.S. 126-16.1. See the Equal Employment Opportunity Institute policy located in Section 1 of the State Human Resources Manual for information related to EEO training.

Complaint Process

An individual covered by this policy who is alleging unlawful discrimination may file a complaint following the process outlined in the Employee Grievance Policy located in Section 7 of the State Human Resources Manual. For the purpose of this policy, political affiliation is not a protected classification under federal EEO law but may be grieved pursuant to G.S. 126-34.02 as a contested case after completion of the agency grievance procedure and the Office of State Human Resources review.

Definitions

<p>“Age Discrimination” – The Age Discrimination in Employment Act of 1967 forbids employment discrimination on the basis of age against individuals who are age 40 or older.</p>
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“Bona Fide Occupational Qualification” (BFOQ)

A BFOQ is any requirement which is job-related and necessary for the performance of the job. Age, sex or physical requirements may be considered if they constitute a BFOQ necessary for job performance in the normal operations of the agency. Such standards are reasonably necessary for the specific work to be performed and are uniformly and equally applied to all applicants for the particular job category. Whether such a requirement is a BFOQ will depend on the facts in each case. This exemption will be construed very narrowly and the agency, department or university will have the burden of proving the exemption is justified. To establish age, sex or physical requirements as a BFOQ, it will be necessary to submit a recommendation to the Office of State Human Resources, setting forth all facts and justification as to why the requirement should be considered as a reasonable employment factor in each of the classifications in question.

“Disability Discrimination” – The Americans with Disabilities Act of 1990 (ADA) and the Americans with Disabilities Act Amendments Act of 2008 (ADAAA) prohibits discriminatory treatment of a qualified individual who has a physical or mental impairment that substantially limits one or more major life activities, has a history (or record) of such an impairment, or is regarded as having such an impairment that is not transitory (lasting or expected to last six months or less) or minor. In addition, the law protects covered individuals from discrimination based on their known relationship (or association) with an individual with a disability (even if they themselves do not have a disability).

Refer to the Reasonable Accommodation policy in Section 1 of the State Human Resources Manual for information on how to request and process requests for accommodations for covered individuals with disabilities.

“Genetic Information Discrimination” - The Genetic Information Nondiscrimination Act of 2008 (GINA) is a federal law which prohibits discrimination in the terms and conditions of employment against covered individuals based on their genetic information. Genetic information is:

- an individual’s genetic tests (including genetic tests done as part of a research study);
- genetic tests of the individual’s family members (defined as dependents and up to and including 4th degree relatives);
- genetic tests of any fetus of an individual or family member who is a pregnant woman, and genetic tests of any embryo legally held by an individual or family member utilizing assisted reproductive technology;
- the manifestation of a disease or disorder in family members (family history); and
- any request for, or receipt of, genetic services or participation in clinical research that includes genetic services (genetic testing, counseling, or education) by an individual or family member.

“National Origin Discrimination” – Title VII of the Civil Rights Act of 1964 prohibits unfavorable treatment of covered individuals because he or she is from a particular country or part of the world, because of ethnicity or accent, or because he or she appears to be of a certain ethnic background (even if he or she is not). In addition, the law covers individuals who are married to (or associated with) an individual of a certain national origin or because of their connection with an ethnic organization or group.

“Pregnancy Discrimination” – The Pregnancy Discrimination Act of 1978 prohibits unfavorable treatment of a covered individual because of pregnancy, childbirth, or a medical condition related to pregnancy or childbirth.

“Race/Color Discrimination” – Title VII of the Civil Rights Act of 1964 forbids unfavorable treatment of covered individuals because he or she is of a certain race or because of personal characteristics associated with race (such as hair texture, skin color, or certain facial features). Color discrimination involves treating an individual unfavorably because of skin color. In addition, Title VII protects covered individuals from discrimination because the individual is married to (or associated with) an individual of a certain race or color or because of an individual’s connection with a race-based organization or group, or an organization or group that is generally associated with people of a certain color.

“Religious Discrimination” – Title VII of the Civil Rights Act of 1964 forbids unfavorable treatment of covered individuals because of his or her religious beliefs. The law protects not only the people who belong to traditional, organized religions (such as Buddhism, Christianity, Hinduism, Islam, and Judaism), but also others who have sincerely-held religious, ethical or moral beliefs. In addition, Title VII protects an individual who is married to (or associated with) an individual of a particular religion or because of his or her connection with a religious organization or group. The agency, department, or university must reasonably accommodate an employee’s religious beliefs or practices, unless doing so would cause unreasonable difficulty or expense for the agency, department or university. This would include making reasonable adjustments at work that will allow the employee to practice his or her religion.

“Sex-Based Discrimination” – Title VII of the Civil Rights Act of 1964 forbids unfavorable treatment of covered individuals because of that individual’s sex. In addition, the law protects an individual because of his or her connection with an organization or group that is generally associated with people of a certain sex. The Equal Pay Act of 1963, as amended, prohibits sex discrimination in the payment of wages to women and men performing substantially equal work, in jobs that require equal skill, effort, and responsibility, under similar working conditions, in the same establishment.

WESTERN CAROLINA UNIVERSITY EQUAL EMPLOYMENT OPPORTUNITY POLICY STATEMENT

Western Carolina University emphatically states that it will provide equal employment opportunities for all persons regardless of race, color, national origin, religion, sex, age, gender identity or expression, sexual orientation, genetic information, veteran status, disability, or political affiliation, except where religion, sex, or age are bona fide job related employment requirements. This is in keeping with Title VII of the Civil Rights Act of 1964 as amended, Executive Order 11246, as amended, the Rehabilitation Act of 1973, the Equal Pay Act of 1963, the Age Discrimination in Employment Act of 1968 as amended, the Civil Rights Restoration Act of 1988, NC G.S. 1126-16 as amended, the Americans with Disabilities Act of 1990, the Civil Rights Act of 1991, the Genetic Information Nondiscrimination Act (GINA) of 2008, and other applicable federal and state EEO and anti-discrimination laws or statutes.

In furtherance of this policy Western Carolina University will not tolerate retaliatory action of any kind taken by any employee of Western Carolina University against any other employee or applicant for employment because that person filed a complaint or charge of employment discrimination, testified, assisted or participated in any manner in a hearing, proceeding or investigation of employment discrimination.

To ensure that equal employment opportunity exists throughout the university, a results oriented equal employment opportunity program has been implemented to overcome the effects of past discrimination and to eliminate any artificial barriers to employment opportunities for all qualified individuals that may exist in any of our programs. All selection, hiring, and promotion decisions are based on valid requirements that are job related and consistent with performance of the essential functions of the job.

This program shall ensure greater utilization of all persons by identifying the underutilized groups in the workforce (especially minority, female, qualified veterans and disabled workers) and making special efforts to increase their participation in recruitment, selection, hiring, promotion, compensation, performance appraisal, disciplinary and grievance procedures, separations, and reduction in force, and any other term, condition, or privilege of employment. When necessary, Western Carolina University will provide reasonable accommodations for applicants and/or employees with disabilities when doing so will enable them to successfully perform the essential job functions of the job or benefit from training. WCU is also committed to preventing any harassment based on race, color, national origin, religion, sex, age, gender identity or expression, sexual orientation, genetic information, veteran's status or disability including sexual harassment.

Program objectives and timetables shall be established to reduce and eliminate the underutilization of all groups through the equal employment opportunity plan and program. Responsibility for the development of this plan and program is assigned to the Associate Vice Chancellor for Human Resources. However,

responsibility for the implementation of the EEO compliance program will be shared by all managers and supervisors.

The equal employment opportunity program will be evaluated and monitored continuously. Periodic reports on the progress of this program will be presented to the Chancellor by the Associate Vice Chancellor for Human Resources and/or the Chief Diversity Officer.

Western Carolina University is committed to this program and is aware that with its implementation, positive benefits will be received from the greater utilization and development of previously underutilized human resources.

QUALIFIED INDIVIDUALS WITH DISABILITIES AND QUALIFIED PROTECTED VETERANS POLICY AND PLAN

Under the Affirmative Action obligations imposed by Section 503 of the Rehabilitation Act of 1973 and Vietnam Era Veterans' Readjustment Assistance Act of 1974 (VEVRAA), as amended, it is the policy of Western Carolina University to provide Equal Employment Opportunities and to advance in employment qualified individuals with a disability as well as qualified protected veterans. This policy is designed to employ and advance all qualified individuals with a disability and qualified protected veterans at all levels of employment. Western Carolina University's policy of providing Equal Employment Opportunities to qualified persons with a disability and qualified protected veterans shall apply to all employment practices including, but not limited to: upgrading, demotion or transfer, layoff or termination, rates of pay or other forms of compensation, and selection for training. Western Carolina University attempts to comply with all of the rules, regulations, and relevant orders of the Secretary of Labor and the Office of Federal Contract Compliance Programs (OFCCP), issued pursuant to Section 503 of the 1973 Rehabilitation Act and the 1974 Vietnam Era Veterans' Readjustment Assistance Act, as amended.

Western Carolina University's Affirmative Action Program for qualified persons with a disability and qualified protected veterans is reviewed and updated annually. If there are any significant changes in procedure, or if employee rights or benefits are modified as a result of an annual updating, these changes are communicated to employees and to applicants for employment.

On a strictly voluntary basis, Western Carolina University invites all qualified protected veterans who are either employees or applicants for employment, and employees who have a disability, and who wish to benefit under the University's Affirmative Action Program to self-identify. Any individual who identifies himself/herself will not be subjected to any form of harassment or retaliation based on his/her status or self-identification. Further, this self-identification will be kept confidential.

Employees and applicants shall not be subjected to harassment, intimidation, threats, coercion or discrimination because they have engaged in or may engage in any of the following activities: (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 of the Rehabilitation Act of 1973, as amended, VEVRAA, as amended, or any other Federal, State or local law requiring equal opportunity for disabled persons or qualified protected veterans or; (3) opposing any act or practice made unlawful by Section 503 of the Rehabilitation Act of 1973, VEVRAA or its implementing regulations in this part or any other Federal, State or local law requiring equal opportunity for disabled persons or for qualified protected veterans; or (4) exercising any other right protected by Section 503 of the Rehabilitation Act of 1973, or its implementing regulations in this part or any other right protected by VEVRAA or its implementing regulations in this part.

The target veteran groups include:

Disabled Veteran;
Veterans who served on active duty in the Armed Forces during a war or in a campaign or expedition for which a campaign badge has been authorized;
Veterans who, while serving on active duty in the Armed Forces, participated in a United States military operation for which an Armed Forces Service Medal was awarded pursuant to Executive Order No. 12985;
Recently Separated Veterans.

Review of Personnel Processes

Western Carolina University reviews annually its personnel processes to determine whether its present procedures ensure careful, thorough and systematic consideration of the qualifications of known qualified individuals with disabilities and qualified protected veterans. This review covers all procedures related to the filling of job vacancies either by hire or promotion, as well as all training opportunities offered or made available to employees.

In determining the qualifications of veterans, Western Carolina University limits its consideration of a qualified protected veteran's military record, including discharge papers, to only that portion of the record which is relevant to the specific job qualifications for which the veteran is being considered.

Based upon Western Carolina University's review of its personnel processes, the University will modify the personnel processes when necessary, and will include the development of new procedures in the Affirmative Action Program to ensure equal employment opportunity.

Review of Physical and Mental Job Qualification Standards

Western Carolina University commits to reviewing the physical and mental job qualifications of all positions during the respective plan year to ensure that, to the extent that such qualification requirements tend to screen out qualified individuals with disabilities and qualified disabled veterans, job qualifications are consistent with business necessity and the safe performance of the job.

No qualification requirements were identified which had a screening effect. All job qualification requirements were found to be job-related and consistent with business necessity and safety.

Western Carolina University will continue to review physical and mental job qualification requirements whenever a job is vacated and the university intends to fill it through hiring, promotion or transfer and will conduct a qualifications review whenever job duties change.

If at any time Western Carolina University should inquire into an employee's physical or mental condition or should conduct a medical examination prior to a change in employment status, Western Carolina University affirms that information

obtained as a result of the inquiry will be kept confidential, except as otherwise provided for in the Section 503 regulations. The results of the examination or inquiry will be used in accordance with the Section 503 regulations.

Reasonable Accommodation to Physical and Mental Limitations

Western Carolina University commits to making reasonable accommodation to the known physical or mental limitations of qualified individuals with disabilities and qualified disabled veterans, unless such accommodation would impose an undue hardship on the conduct of its business. Western Carolina University also commits to engaging in an interactive process with the person requesting the accommodation (or their representative), as needed, to determine an appropriate accommodation. Undue hardship will be determined by assessing whether the requested accommodation would cause significant difficulty or expense as provided for in the Section 503 regulations.

SECTION II

ASSIGNMENT OF RESPONSIBILITY AND ACCOUNTABILITY

GOVERNOR

The Governor of the State of North Carolina has overriding responsibility for the State's equal employment opportunity policies and programs. The responsibility for the actual development and implementation of individual equal employment opportunity plans and programs is delegated by the Governor to each university chancellor and each head of a department of State and each head of a State agency or commission.

OFFICE OF STATE HUMAN RESOURCES RESPONSIBILITIES

The Office of State Human Resources (OSHR) shall:

- establish the EEO Plan Requirements and Program Guidelines in accordance with federal and state laws to be followed by all agencies, departments and universities, to ensure commitment to and accountability for equal employment opportunity throughout State government;
- review, approve and monitor all EEO plans and updates;
- provide services of EEO technical assistance, training, oversight, monitoring, evaluation, support programs, and reporting to ensure that State government's work force is diverse at all occupational levels;
- develop and promote EEO programs and best practices to encourage consistent and fair treatment of all State employees;
- meet with agency heads, department heads, and university chancellors, Human Resources Directors and EEO Directors/Officers annually to discuss the progress made toward reaching program goals; and
- provide a report annually to the Human Resources Commission and the Governor on the EEO Plans and progress by agencies, departments, universities and state government.

WESTERN CAROLINA UNIVERSITY RESPONSIBILITIES

Chancellor

- Adhere to the policies and programs that have been adopted by the State Human Resources Commission and approved by the Governor;
- Designate a management-level official responsible to oversee the EEO program;
- Ensure each manager and supervisor has, as a part of his or her performance plan, the responsibility to comply with EEO laws and policies, and assist in achieving EEO goals established by the agency, department or university;
- Communicate the agency or university's commitment to EEO to all employees, applicants and the general public;
- Provide necessary resources to ensure the successful implementation of the EEO program; and
- Ensure the development and implementation of HR policies, procedures, and programs necessary to achieve a diverse workforce in each occupational category.

EEO Officer

The Associate Vice Chancellor for Human Resources, or designated EEO Officer, is responsible for ensuring the following:

- Interpret and apply Federal laws, state statutes, and policies related to equal employment opportunity;
- Ensure the EEO Plan is submitted by March 1 annually in accordance with the EEO Plan Requirements and Program Guidelines as specified by the Office of State Human Resources;
- Ensure hiring recommendations are reviewed for compliance with EEO program objectives prior to the final agency/university hiring decision;
- Ensure all employees are made aware of the EEO policy including the Annual EEO Plan, EEO Policy, Reasonable Accommodation Policy, and Unlawful Workplace Harassment Policy and develop strategies to prevent unlawful workplace harassment and retaliation in the workplace;
- Maintain and analyze data on workforce utilization and employment practices, including records of all complaints and grievances alleging discriminatory practices;
- Advise management of the EEO program's impact and effectiveness;
- Provide or coordinate EEO training for management and employees;
- Provide confidential consultation for management and employees in matters involving EEO concerns;
- Ensure federal laws prohibiting job discrimination are posted in work locations where notices to applicants and employees are customarily posted and easily accessible to applicants and employees with disabilities;
- Establish and maintain effective working relations with groups concerned with EEO and Diversity & Inclusion;
- Coordinate programs to achieve program objectives;

- Present information on the EEO plan and program to management and employees on a regular basis; and
- Ensure all newly hired, promoted, or appointed supervisors and managers complete required EEO training in accordance with G.S. 126-16.1.

Managers and Supervisors

Decisions that impact most directly on the success of the EEO program are made by persons at the managerial and/or supervisory level, therefore the roles of manager and supervisor are most crucial to the program. Each manager and supervisor is responsible for implementing the specific elements of the Affirmative Action Plan that are designed to eliminate barriers to equal employment opportunity which cause underutilization. The specific responsibilities of managers and supervisors include, but are not limited to:

- Assisting in the development and implementation of the EEO plan and program and established program objectives;
- Reviewing the qualifications of all applicants and employees to ensure qualified individuals are treated in a nondiscriminatory manner when hiring, promotion, transfer, and termination actions occur;
- Reviewing the job performance of each employee to assess whether personnel actions are justified based on the employee's performance of his or her duties and responsibilities;
- Maintaining a diverse workforce for the department, division, work unit, or section; and
- Providing a work environment and management practice that supports equal opportunity in all terms and conditions of employment.

Equal Employment Opportunity (EEO) Committee

EEO Committee responsibilities shall include, but are not limited to:

1. serving as a communication link between managers and employees and the EEO staff on aspects of the EEO plan and program.
2. reviewing and evaluating the equal employment opportunity plan and program.
3. reviewing workforce representation data in each occupational category.
4. surveying the organizational climate, employee attitudes, and evaluating the resultant data.
5. meeting with the university chancellor in conjunction with the EEO Officer to discuss EEO programs, report on the employees' concerns, and recommend changes or additions to the EEO policy, plan, or program.
6. identifying recruitment resources and other activities designed to strengthen the EEO program.
7. meeting at least bi-annually.
8. Once appointed, all EEO Committee members should attend the EEO training, if they have not already completed the course.

EEO Committee Membership

Name	Position Title
Ellie Blair	Associate Professor, School of Teaching & Learning
Chris Dahlquist	Talent Development Manager
Lowell Davis	Vice Chancellor for Student Success
Pamela Degraffenreid	Director of University Bookstore
Tom D'Angelo	Assistant Professor, Accounting
Dan Gibson	Director of Compliance
Nelson Granda-Marulanda	Assistant Professor, School of Engineering & Technology
Brandi Hinnant Crawford	Assistant Professor, Human Services
Milton Laufer	Director, School of Music
Rebecca Lasher	Assistant Professor, Social Work
Kevin Koett	Associate Vice Chancellor, Student Affairs
Ricardo Nazario-Colon	Chief Diversity Officer
Dana Patterson	Director, Intercultural Affairs
Eleanor Petrone	Associate Professor, English
Sky Sampson	Director, Cherokee Center
Brian Railsback	Professor, English
Caroline Duffy	Research Assistant, Human Services
Matt Opinski	President, Student Govt. Association
JoBeth Shafran	Assistant Professor, Political Science & Public Affairs
Yanjun Yan	Assistant Professor, School of Engineering & Technology

SECTION III DISSEMINATION OF EQUAL OPPORTUNITY POLICY AND PLAN

Western Carolina University is committed to equal opportunity and exhibits this by disseminating the policy and affirmative action plan. The Chancellor and Vice Chancellors continually emphasize that commitment at all levels of University employment. The following specific actions have been instituted to distribute the policy and will continue:

Internal Dissemination and Communication Procedures

The Equal Employment Opportunity Policy is included in the Western Carolina University Employment Policies for University Employees.

The Equal Employment Opportunity Policy and information on affirmative action is included in relevant employment handbooks as well as the Student Handbook.

Each new employee will be made aware of and provided access to the University EEO Policy.

The Equal Employment Opportunity Policy and information on affirmative action are explained and discussed with faculty/administrator search committees and supervisory personnel as they organize for the search process.

The Equal Employment Opportunity Policy is provided to all department/office heads as well as being posted in conspicuous places throughout the campus.

The University EEO Plan is available on the University intranet and is accessible by all employees.

The WCU "Equal Opportunity Employer" statement is included on appropriate forms and publications.

A conscientious effort is made by the Department of Communications and Public Relations to publish articles covering promotions and achievements of women, minorities, individuals with disabilities, qualified veterans, and other employees in internal publications as well as local news media.

Summaries of the University EEO Report are provided to the Provost, Vice Chancellors, Deans, University Compliance Officer, and the Chief Diversity Officer.

Copies of the Affirmative Action Plan are placed on the University website and will be made available to anyone upon request to the Associate Vice Chancellor for Human Resources.

External Dissemination and Communication Procedures

All recruiting sources, including State employment agencies, educational institutions and social service agencies are informed of Western Carolina University's policy concerning the employment of qualified women and minorities, qualified individuals with disabilities and qualified veterans and have been advised to actively recruit and refer qualified persons for job opportunities.

All subcontractors, vendors and suppliers are sent written notification of Western Carolina University's Equal Employment Opportunity and Affirmative Action policies regarding the employment of qualified women and minorities, qualified individuals with disabilities and qualified protected veterans.

The equal employment opportunity clause concerning the employment of qualified women and minorities, qualified individuals with disabilities and qualified protected veterans are included in all non-exempt subcontracts and purchase orders.

A conscientious effort is made by Public Relations to publish articles covering promotions and achievements of women, minorities, and other employees in external media sources.

SECTION IV ELEMENTS OF THE AFFIRMATIVE ACTION PLAN

This Affirmative Action Plan (AAP) reflects the commitment of Western Carolina University to ensure equal opportunity in its establishment for all its applicants and employees and to identify and remove any barriers to equal opportunity and employment.

This AAP covers the 12-month period of October 1, 2018 to September 30, 2019.

AAP Elements

Workforce Analysis

Job Group Analysis

Determination of Availability and Comparison of Incumbency to Availability

Set Placement Goals

Workforce Analysis

The workforce analysis includes lists of the organizations entire staff showing each job title in the establishment by departments, ranked from lowest to highest rate range. For each job title, the number of employees, the range of compensation, and incumbent distribution among females and males of various racial groups are reported.

Job Group Analysis

In order to establish each job group, Western Carolina University has surveyed its workforce and placed various positions into groups having similar content, wage rates, and opportunities. The Job Group Analysis is a listing of all the job titles that make up each job grouping. The sex and race of each incumbent in the various jobs are also identified. See below for the listing of each job group (41 CFR 60-2.12©).

Different salary grades and ranges have been combined within job groupings in order to make each grouping large enough to be statistically significant. This is in response to the regulations emphasis on grouping jobs with similar responsibility, similar pay or salary clusters, and similar opportunities for training, transfer, and advancement.

University Job Groups:

100-Administrators
200-Faculty, Engineering & Technology
205-Faculty, Fine & Performing Arts
210-Faculty, Health & Human Sciences
220-Faculty, Arts & Sciences
230-Faculty, Business
240-Faculty, Education & Allied Professions
250-Library
300-Other Professionals
400-Technicians and Paraprofessionals
500-Office Support and Clerical
600-Skilled Craft Workers
700-Safety & Security
800-Other Auxiliary Services
910-Temporary-Adjunct
920-Temporary-Staff

Determination of Availability and Comparison of Incumbency to Availability

The purpose of the availability analysis is to determine the representation of minorities and women among those qualified (or readily capable of becoming qualified) for employment for each job group in the workforce. Availability is the yardstick against which the actual utilization of minorities or women in each job group is measured. The Two-Factor Analysis, as defined by the Office of Federal Contract Compliance Programs (OFCCP), is used to determine availability in the work force. This method involves the following steps:

Determine availability of minorities and females in each job category by two established factors. The two factors are: (1) the number of qualified employees from the organization's internal labor force, and (2) the number of qualified persons from the population within the determined reasonable recruitment area;
Determine underutilization by comparing actual workforce data to established availability in each job category;
Determine projected hires based on the projected turnover percentage in each job category where underutilization exists;
Formulate a set objective for the initial reduction and the proposed elimination of the underutilization in each job category; and
Develop procedures and programs to facilitate the likelihood of achievement of program objectives within the established time frames.

Underutilization of women or racial/ethnic minorities exists in a job group when the actual number of employees is less than the number that would reasonably be expected by their availability. The Office of Federal Contract Compliance Programs' definition of underutilization relies on a standard of reasonableness. Institutions may select among three recognized standards: The Any Difference Test; an 80% test; and a standard deviations test. The University's goals have been set by applying the "Two Standard Deviation Rule."

In using this measure for determining underutilization one effectively deals with the imprecision associated with personnel data and work force shifts. The "Two Standard Deviation Rule" is based on the observation that if the employer pays no attention at all to race or sex in placing people in jobs, there would be some natural degree of departure from perfect parity, both above and below, and that only extreme departures below parity should be construed as evidence of possibly discriminatory practices. If the difference between actual utilization and the availability percentages results in two points from the mean, then the difference may be significant and a goal should be set.

For analysis and evaluation, Western Carolina University's employee complement is divided into 16 job groups -- defined by similarity of opportunity, content, and salary or wage scale. Seven of the 16 job groups represent faculty employees, which are grouped according to disciplines that correspond to readily available labor market information from the Survey of Earned Doctorates. All other job groups are analyzed using national, state, or regional labor market information from the 2010 national census.

Workforce availability is adjusted for the number of qualified employees in each race and gender category that are considered promotable, transferable, and trainable within the organization to determine the overall recruitment area availability. The institution's workforce needs are addressed by identifying the groups that are underutilized (defined as having fewer employees in a demographic group in a particular occupational category than would reasonably be expected based on the appropriate census data).

SECTION V
EQUAL EMPLOYMENT OPPORTUNITY PROGRAM ACTIVITY

PRIOR YEAR'S AAP PERFORMANCE

Summary of Prior Year's Affirmative Action Plan—Demonstration of Good-Faith Effort

Pursuant to 41 CFR 60, Western Carolina University undertakes an annual evaluation of the representation of women, racial/ethnic minorities, individuals with disabilities, and qualified veterans among its employees in relation to their representation. While fluctuations in representation within our employee complement occur naturally from year to year, the crux of equal employment opportunity/affirmative action planning is the comparison of the university's workforce to the corresponding labor market on a job group by job group basis. In the simplest of terms, the goal of the university's EEO/AA plan, over time, is for the university workforce to reflect the labor market. The focus of the Affirmative Action plan is to reflect any progress made in the past year as well as to identify where continuing improvement is needed to achieve parity with labor market availability.

As of October 1, 2018, the total number of employees at Western Carolina University increased by 40 from the previous year and 58 from Fall 2016. All recruited faculty and administrative positions were at minimum advertised with the Chronicle of Higher Education or HigherEdJobs.com, InsideHigherEd.com, the Higher Education Recruitment Consortium of the Carolinas (HERC), the university web page, the State of North Carolina home page, and the North Carolina Division of Employment Security. All other externally posted positions were at minimum, advertised internally, on the University web page and with the North Carolina Division of Employment Security.

The overall number of faculty increased by nine for the 2018-2019 plan year from 533 to 542 with minority representation remaining unchanged at 11.6%. Faculty female representation decreased by 1.4%. The University has taken several proactive steps to recruit for minority faculty and have made efforts in this area to increase minority representation. Irrespective of economic and/or geographical factors Western Carolina University understands the importance of developing and promoting a diverse workforce and recognizing the challenges encountered with successfully recruiting and retaining minority faculty and staff to the university.

A description of each job group follows with statistics describing the 2018-2019 plan year.

Job Group 100: Administrators

37.5% of the administrators are female (6.6% increase) and 14.3% identify as minority (+1.6%). It has been determined from census and workforce data that the overall availability for administrators is 40.2% female and 19.8% minority.

Job Group 200: Faculty, Engineering & Technology

The College of Engineering & Technology includes the disciplines/departments of Engineering, Engineering Technology, and Construction Management. The faculty is 7.7% female (a decrease of .04% from last year) and 38% minority (2% decrease from last year). Full time tenure track faculty are externally recruited nationwide, as is typical of any college or university seeking faculty with Ph.D. degrees in specific disciplines. Compiled statistics from Summary Reports: Doctorate Recipients from U.S. Universities indicate that availability for females in this job group is 14.9% and minority availability is 31.6%. Significant strides in minority and representation have been made in this college.

Job Group 205: Faculty, Fine & Performing Arts

Fine & Performing Arts includes the disciplines/departments of the School of Art & Design, School of Music, and the Department of Stage & Screen. The faculty is 35.1% female (1.7% decrease since last year – 7.3% increase since 2014). The minority representation in the college is currently 5.3% (increase of 3.5% from previous year). Full time tenure track faculty are externally recruited nationwide. Compiled statistics from Summary Reports: Doctorate Recipients from U.S. Universities indicate that availability for females in this job group is 51.2% and minority availability is 15.4%. Continued efforts to enhance diversity within this college will remain a priority.

Job Group 210: Faculty, College of Health & Human Sciences

The College of Health & Human Sciences includes the departments/disciplines of Communication Sciences & Disorders, the School of Nursing, the School of Health Sciences, Social Work, and Physical Therapy. The faculty is 80.9% female (-3.4% from 2017) and 6.4% minority (unchanged). Full time tenure track faculty are externally recruited nationwide. Compiled statistics from Summary Reports: Doctorate Recipients from U.S. Universities indicate that availability for females in this job group is 71.4% and minority availability is 19.6%. As incumbent percentages for minority faculty are below expected availability, it is imperative to continue to place strong emphasis on diversity recruitment for vacant faculty positions in this college.

Job Group 220: Faculty, College of Arts and Sciences

The College of Arts and Sciences includes the disciplines/departments of Anthropology and Sociology, Biology, Chemistry and Physics, Communication, Criminal Justice, English, Geosciences and Natural Resources Management, History, Mathematics and Computer Science, World Languages, Philosophy and Religion, and Political Science and Public Affairs. The faculty is currently 43.3% female (1.3% decrease) and 12.0% minority (decrease of 1.2%). Open Faculty positions are recruited nationally, and nationwide statistics show that these disciplines have availability of 40.0% female and 20.9% minority. Female representation in this college remains in line with national data and representation of minority faculty in this job group has shown significant growth over the past five years. A strong emphasis on the recruitment and retention of qualified minority faculty has resulted in increased representation within this college and will continue to be a point of emphasis.

Job Group 230: Faculty, College of Business

The College of Business includes the schools/disciplines of Accounting, Finance, Information Systems, and Economics; Business Administration and Law and Sport Management; Economics, Management, and Project Management; and Marketing, Entrepreneurship, Sport Management, and Hospitality and Tourism. The faculty composition is 35.6% female (+.07%) and 17.0% minority (an increase of 1.1%). Nationwide statistics show an external availability of 37.4% female and 23.9% minority.

Job Group 240: Faculty, College of Education and Allied Professions

The College of Education and Allied Professions(COEA) includes the departments of Educational Leadership and Foundations; Elementary and Middle Grades Education; Health, Physical Education & Recreation; Human Services; and Psychology. The faculty consists of 62.9% female (3.4% decrease) and 9.0% minority (1.0% increase from the previous year). Nationwide availability statistics show 68.1% female and 20.6% minority. As minority and female faculty representation remains below national averages a need for continued efforts to recruit and retain minority candidates still exists.

Job Group 250: Library

The composition of professional staff in the library includes 88.2% female and 0.0% minority (5.9% decrease). The national availability for this job group is 65.6% female and 23.7% minority.

Job Group 300: Other Professionals

This job group includes professional staff (excluding faculty and administrators) such as auditors, accountants, university physicians, nurses, counselors, advisors, etc. This job group is composed of 57.1% female (-.08%) and 12.3% minority (+1.4% from 2017). These employees are also recruited nationally and external statistics based on 2010 census data show availability of 61.2% female and 23.4% minority. While minority representation has increased over the past three years (4.1%) continued efforts to attract and retain qualified minority professional staff remains a priority.

Job Group 400: Technicians and Paraprofessionals

This job group is composed of 33.6% female (0.8% decrease) and 9.0% minority (an increase of 1.8% since 2017). Employees in this job group are primarily recruited from the local four county recruitment area (Jackson, Macon, Transylvania, Haywood) and external availability statistics based on 2010 census data show 43.9% female and 13.5% minority.

Job Group 500: Office Support and Clerical

The Office Support and Clerical job group is composed of 93.0% female and 5.7% minority (a decrease of 0.3% from the previous plan year). Employees in this job group are primarily recruited from the local four county recruitment area (Jackson, Macon, Transylvania, Haywood) and external availability statistics based on 2010 census data show 72.9% female and 6.0% minority.

Job Group 600: Skilled Craft Workers

This job group, which includes positions such as electrician, mechanic, carpenter, plumber, etc., is composed of 7.2% female (unchanged from last year) and 3.6% minority (unchanged). Employees in this job group are primarily recruited from the local four county recruitment area (Jackson, Macon, Transylvania, Haywood) and external availability statistics based on 2010 census data show 6.9% female and 5.3% minority. Given the low representation and availability of females and minorities within this job group, the ability to attract and retain qualified women and minority candidates for these positions remains a priority.

Job Group 700: Safety and Security

The Safety and Security job group which includes the University Police force is made up of 17.7% female (2.9% decrease) and 5.9% minority (3% decrease). These positions are traditionally recruited from the local four county region and external availability statistics based on 2010 census data show 26.4% female and 11.4% minority.

Job Group 800: Other Auxiliary Services

This job group which includes positions such as food service workers, grounds workers, general utility workers, housekeepers, etc. is composed of 38.9% female and 6.7% minority. Employees in this job group are recruited from the local four county recruitment area and 2010 census data shows an external availability of 40.3% female and 10.3% minority. As positions in this job group become vacant, a continued strong emphasis needs to be placed on recruiting qualified minorities into this job group.

Job Group 910: Temporary – Adjunct Faculty

This job group consists of adjunct faculty is composed of 56.7% female and 7.6% minority. Employees in this job group are recruited from the local four county recruitment area and 2010 census data shows an external availability of 73.5% female and 5.1% minority.

Job Group 920: Temporary - Staff

This job group which includes all temporary staff positions is comprised of 51.9% female and 12.6% minority. Employees in this job group are recruited from the local four county recruitment area and 2010 census data shows an external availability of 54.8% female and 7.6% minority.

Recruitment

The Office of Human Resources (OHR) at Western Carolina University has centralized administrative responsibility for all University employment processes to include recruitment. Through established procedures that are consistent with the University's equal employment opportunity policy statement, OHR will work to achieve a diverse workforce within each occupational category that successfully meets the needs and demands of the University.

To ensure compliance with State and Federal laws, OHR approves the placement of advertisements and the screening of applications. Media sources include newspapers, occupation specific publications, professional journals, professional association newsletters, and Internet sites. Recruitment for staff and faculty positions includes, but is not limited to, the following activities: posting with the North Carolina Division of Employment Security; posting on the university jobs website (<http://jobs.wcu.edu>); placement with career websites such as HigherEdJobs.com and InsideHigherEd.com; placement with the Higher Education Recruitment Consortium of the Carolinas (HERC); placement with LocalJobNetwork.com, weekly postings with minority publications such as the Cherokee One Feather; contacts with minority and women's colleges and universities; technical school recruitment visits; university, community, and regional career/job fairs; and developing relationships with various community organizations and agencies.

To begin the recruitment process, departments create and submit an online vacancy notice to the Office of Human Resources to recruit for a vacancy. Upon receiving the notice, the designated Recruitment Coordinator posts the vacancy and assists the hiring department in the recruitment, screening, and referring of applications for the position. SHRA staff vacancies must remain open a minimum of five workdays after being posted. Tenured track faculty and EHRA non-faculty positions should remain open a minimum of 30 calendar days. The Recruitment Coordinator consults with the Hiring Department to develop an appropriate recruitment plan (to include any special diversity recruitment efforts).

Individuals interested in University employment must complete an online application for employment and all applications must be initially evaluated by the Office of Human Resources or approved search committee. Applicants are considered for only those specific vacancies for which they apply. For SHRA positions, the Recruitment Coordinator evaluates each applicant's education, experience, skills, and competencies in relation to valid job requirements and as indicated in the University's Merit Based Recruitment and Selection Plan. Additionally, the Recruitment Coordinator identifies any special priority considerations, such as promotional priority, re-employment (layoff) priority, veteran's preference or return from workers compensation and works with the hiring to department to ensure proper priority is awarded. For EHRA Faculty and Non-Faculty positions, the Recruitment Coordinator works with the designated search committee to ensure all application materials are given proper consideration, all appropriate preferences are afforded, and all search procedures are followed.

Disciplinary Process

Western Carolina University's disciplinary process and procedures are designed to provide equitable treatment for all employees in accordance with applicable policies. The University administers a progressive disciplinary process for SHRA employees by which discipline is administered only for just cause and apportioned to the degree of severity and frequency of unacceptable employee performance or conduct. All disciplinary actions are to be administered consistently and equitably without regard to race, color, sex, gender identity or expression, sexual orientation, genetic information, religion, age, political affiliation, national origin, or disability. All disciplinary actions are subject to the approval of the Office of Human Resources to ensure all aspects of the disciplinary process have been followed. This policy provides employees and management with a process for correcting and improving performance problems and handling instances of unacceptable personal conduct or grossly inefficient job performance. Any employee of the University may be warned, demoted, suspended or dismissed for just cause. However, SHRA employees must receive successive discipline as prescribed in this policy. Unsatisfactory job performance, grossly inefficient job performance or unacceptable personal conduct constitutes just cause for discipline or dismissal. When just cause exists, the only disciplinary actions provided under this policy are: written warning; disciplinary suspension without pay; demotion; or dismissal. Additional information on the university SHRA Disciplinary process is available at: <http://www.wcu.edu/discover/leadership/office-of-the-chancellor/legal-counsel-office/university-policies/numerical-index/university-policy-78.asp>

Selection

Western Carolina University is committed to adhering to university and state recruitment and selection guidelines and ensuring that all steps in the selection process are non-discriminatory and job related. The primary goal of the selection process is to find the best available candidate for the recruited position. This candidate will possess the skills, knowledge, abilities, and competencies necessary to successfully fill the position. The hiring department is responsible for determining which applicants will be interviewed. Only those candidates that meet the minimum advertised qualification requirements may be considered for an interview. The department maintains summaries of all interviews. Interview guidelines and effective interview training is provided by the designated Recruitment Coordinator and the Office of Human Resources to facilitate proper interviewing procedures. When the interview process has been completed and a candidate selected, the department submits an online Hiring Proposal to the Office of Human Resources where the request is evaluated to ensure all university equal opportunity commitments have been met and all university, state, and federal policies, procedures, and regulations have been satisfied. Upon selection, the Office of Human Resources ensures that each employee receives a written employment letter outlining the terms and conditions of employment and provides information about University EEO policies, plan, and program.

Job Structuring

Western Carolina University is committed to maintaining campus-wide alignment in the classification of its positions. Currently, all SHRA positions at the university are categorized within the statewide Career Banding classification and pay system. This Classification system provides a structured approach using consistent criteria for analyzing and classifying the duties and responsibilities of SHRA positions. The Office of State Human Resources (OSHR) establishes and maintains the Career Banding classification and pay system for all SHRA positions and exercises overall administrative authority of the system. Administration of the Career Banding classification and pay system at Western Carolina University is the responsibility of the Office of Human Resources. Criteria for the establishment, structuring, and alignment of EHRA Faculty and Non-Faculty positions are determined based upon a variety of factors to include the relation to the overall mission of the institution, the needs of the department, and the availability of resources. Salaries for these positions are guided by comparison national CUPA data (Carnegie classified Masters Large institutions) and UNC system Peer Group salary ranges.

Current University policy requires that supervisors prepare and submit to Human Resources online job descriptions for each new position and/or to document changes in job duties for any existing position(s). Human Resources reviews the job description and interviews department representatives, employees, and supervisors as appropriate for any additional clarification of responsibilities. Human Resources classifies the position by assigning it to the appropriate occupational category, classification/career band and corresponding salary range based on the duties, responsibilities, and competencies being performed in the

position. Human Resources, under a Delegated Authority Agreement with OSHR, administers all SHRA classification and career banding decisions and actions.

Promotion/Upward Mobility

WCU, in maintaining its commitment to diversity and affirmative processes through the open recruitment of vacancies, does strongly advocate the upward mobility of staff through training and professional development programs that fully prepare the existing workforce for both current and future needs. Upward mobility includes upward movement in the same position through position reclassification, increased career banding competency level, or by transfer to another position within a higher career band or salary range within the university.

Employee Training

Western Carolina University is committed to providing all levels of the workforce with opportunities to enhance skills, expand levels of knowledge, improve job performance, encourage personal development/improvement, and explore career paths. Supervisors are expected to encourage employees to take advantage of training and educational opportunities that will enhance their knowledge, skills, and abilities and will contribute to the overall health of the institution. Western Carolina University's training programs are designed to: assist departments in retaining and motivating employees; provide employees with skills to meet the continuously changing technological demands; enhance professional development and further employee career goals; and provide management with the knowledge, principles, and skills to ensure effective, safe and productive work environments for their employees and departments. All educational and training programs sponsored by the University are well publicized and open to eligible employees. During the current plan year, the University launched a formalized Professional Certification program that is available to all faculty and staff. This program is designed to help encourage the growth and development of our existing workforce and to facilitate upward mobility to the greatest extent possible.

Management Training

Critical to the University's equal opportunity efforts and success are its management compliance training programs. Periodic special management training designed to cover all facets of the University's Equal Opportunity Policy and to define individual responsibility for the effective implementation of the University Equal Employment Opportunity plan is conducted. Additionally, ongoing day-to-day training occurs between managers and the Office of Human Resources. The centralized training administered by the Office of Human Resources is specific and comprehensive for managers/supervisors and is offered on a regular, recurring basis as follows: the definition of equal employment opportunity; the legal bases for equal opportunity; interpreting and applying equal opportunity policies and guidelines; unlawful workplace harassment policies, including the established procedures for reporting, investigating and resolving such matters; preventing work place harassment; the guidelines for valid and legal selection procedures; and identifying and eliminating barriers which can lead to discrimination.

Compensation and Benefits

WCU is committed to ensuring that all employees receive compensation and benefits without discrimination by analyzing practices to determine patterns and needs. University positions with similar duties and responsibilities are assigned to the same job category, classification or career band and corresponding salary range. Employees' salaries are based on the applicant's relevant training and experience, competencies, labor-market considerations, internal salary equity needs, and the availability of funds. Benefits that include leave policies; retirement plans; insurance programs; and other terms, conditions and privileges of employment; are equally available without discrimination to all employees.

Performance Management

Western Carolina University is committed to administering a Performance Management Program that is consistent with GS 143A-17, GS 143 B-10 (h) and State Human Resources Commission policy. This program begins with strategic planning that establishes long-term goals and short-range objectives that may then be used at the work unit level to develop individual work plans for employees in each unit. Individual work plans clarify how an employee's job duties relate to the goals of the work unit, department and university.

Western Carolina University's Performance Management Program is applicable to all EHRA Non-Faculty employees and all SHRA employees who hold a probationary, time-limited, trainee or permanent appointment and involves supervisors and employees in a four-step process: determining performance expectations, establishing a development/improvement plan if appropriate, reviewing expectations and performance at the mid-point of the cycle, and conducting an annual performance appraisal. The program promotes communication between employees and supervisors and involves employees in setting performance expectations. Components of the program include a work plan for each employee, a rating scale containing three performance levels, an annual performance review, an employee development/improvement plan, training for supervisors and employees and a procedure for resolution of disputes arising from appraisal or salary increase decisions.

The Performance Management Program also serves to provide information pertinent to various personnel decisions such as promotion, demotion, merit increases, reduction-in-force, and disciplinary actions.

Program compliance for SHRA employees is monitored by the State Human Resources Commission through the University of North Carolina General Administration, the Office of State Human Resources, and by the University's Office of Human Resources. Program compliance for EHRA employees is monitored at the University level by the Office of Human Resources. Overall responsibility for effective program administration rests with the University. Supervisors are responsible for evaluating employees under their supervision and, in turn, are evaluated by their supervisors on how well they perform this duty.

The goals of Western Carolina University's Performance Management Program are to:

- Insure that employees know what is expected of them regarding their work performance;
- Provide employees with regular feedback regarding their job performance;
- Encourage communication between supervisors and employees;
- Provide an equitable basis for appraising employee job performance;
- Provide a sound basis for making personnel decisions;
- Provide developmental opportunities

For EHRA Faculty, an Annual Faculty Evaluation is conducted to evaluate and provide feedback on overall performance.

http://www.wcu.edu/webfiles/pdfs/provost_4.05_annual_faculty_evaluations.pdf

Transfer and/or Separation

Western Carolina University has in place a structured and uniform procedure for employees transferring and/or separating from employment. University procedures require that notification of separation be submitted to the Office of Human Resources as soon as notification of an employee's intended separation is received. If the separation is due to a resignation or transfer, the employee's letter of intent must accompany the notification. The Office of Human Resources conducts an Employee Exit Interview process for employees leaving university employment. The purpose of this program is to ensure that all internal separation processes have been completed and to serve as a feedback mechanism to enhance overall employment practices and processes.

Grievance Procedures

It is Western Carolina University's policy to provide a means of communication between supervisors and employees and establish principles of administration to insure a prompt, orderly, fair and equitable response to either an SHRA or EHRA employee's grievance. The objectives of each of these policies are intended to assure that employees can get their complaints considered rapidly, fairly and without fear of reprisal; take steps to ensure costs to process grievances are contained; and, resolve workplace issues efficiently and cost effectively. Additional information on the University Grievance policy and procedures is available at: SHRA: <http://www.wcu.edu/discover/leadership/office-of-the-chancellor/legal-counsel-office/university-policies/numerical-index/university-policy-77.asp>

EHRA: <http://www.wcu.edu/discover/leadership/office-of-the-chancellor/legal-counsel-office/university-policies/numerical-index/university-policy-112.asp>

Equal Employment Opportunity and Diversity Fundamentals (EEO/DF)

In accordance with General Statutes (126.16.1), Western Carolina University participates in the North Carolina Office of State Human Resources sponsored Equal Employment Opportunity and Diversity Fundamentals (EEO/DF) for managers and supervisors. The EEO/DF program is offered on the Western Carolina University campus twice per academic year and is provided to newly hired managers and supervisors and any managers and supervisors who have not previously completed the training. All newly hired/promoted managers and supervisors are enrolled in the EEO/DF program within their initial 12 months in the role. A total of 24 WCU managers and supervisors completed EEO/DF training during the previous plan year.

Internal Monitoring, Evaluation, & Reporting Procedures

The Office of Human Resources maintains primary responsibility for monitoring, analyzing and evaluating the University's equal opportunity progress. All areas of the employment process are monitored and regular reports and updates are provided to ensure compliance with and a commitment to equal employment opportunity. Regular reports are generated regarding the number of applicants, hires, promotions, transfers, and separations in each job group. Analyses are performed to determine whether women or minorities have been adversely impacted in any of these areas and if warranted, appropriate corrective action is determined.

VI. REDUCTION IN FORCE OF EMPLOYEES SUBJECT TO THE STATE HUMAN RESOURCES ACT

The Reduction-In-Force (“RIF”) policy (“RIF Policy”) assures equitable treatment of SHRA employees when a RIF becomes necessary. A RIF might become necessary because of a reduction in work or funds, abolishment of a position, or other material change in duties or organization. A RIF decision should be reached only after other applicable measures have been explored, including but not limited to such actions as: delaying the filling of or elimination of vacant positions; limits on purchasing and travel; retraining of employees in needed skill sets; or job sharing and work schedule alternatives.

DEFINITIONS

“**Work Unit**” is a formally established and recognized unit, section, college, division, or department of Western Carolina University (the “University”) in which employees perform a closely related set of functions or duties. A Work Unit manager may define individual research projects headed by a Principal Investigator (“PI”) as a separate work unit for the purposes of this RIF Policy. Any such assertion is subject to appropriate justification that demonstrates the unique nature of the research project and the skills of its assigned staff members as contrasted with other research projects supervised by either the same or differing PIs within the same college or department.

COVERED EMPLOYEES

This RIF Policy applies to:

SHRA employees (full-time and part-time) holding permanent appointments; and

SHRA employees with trainee appointments who have completed twelve (12) months of service (or who attained permanent status prior to entering a trainee appointment).

The following types of SHRA employees may be separated without following the procedures found within this RIF Policy:

SHRA temporary employees;

SHRA employees within their probationary periods;

SHRA employees with time-limited permanent appointments; and

SHRA employees with trainee appointments who have not completed six months of service and had not attained permanent status prior to entering a trainee appointment.

Although this RIF Policy does not apply to EHRA and student appointments, Work Unit managers should consider all staffing resources when determining positions to retain.

PROCEDURES

A RIF decision requires a thorough evaluation of the need for specific positions and the relative efficiency of affected employees so that the University can provide the highest level of service possible with a smaller work force. The decision to separate an employee or group of employees pursuant to this RIF Policy rests with the manager overseeing the affected Work Unit(s).

The Work Unit manager determines which employees shall be separated by applying the following factors in order:

University needs. Consider the continuing work to be performed by the Work Unit(s) and the number of positions in each branch, role, and competency level necessary to perform the continuing work. Once the position(s) to eliminate have been identified, management must consider all employees in positions with the same or related classification within the affected Work Unit. "Same or related" classification means positions in the identified branch, role and competency level in order to identify the affected employees and apply the remaining guidelines.

Type of appointment. SHRA time-limited, temporary, probationary or trainee employees (during their first twelve (12) months of training) who perform work in the same or related SHRA job classification within the affected Work Unit must be separated before any employee with a permanent appointment.

Relative skills, knowledge, and productivity of employees. Employees to be retained must demonstrate the skills and knowledge required for the continuing work of the Work Unit or be able to attain the requisite skills and knowledge within a reasonable period of time in accordance with the operational needs of the Work Unit. Selection must be consistent with the employee's most recent annual performance review and employee competency assessment as well as other relevant documentation.

Length of total state service of employees. Length of service shall be considered but may receive less weight in the determination. Eligible veterans must be accorded one (1) year of state service for each year (or fraction thereof) of military service, up to a maximum of five (5) years of credit.

Workforce diversity. In accordance with federal guidelines affecting equal employment opportunity, any application of the RIF Policy must be reviewed by the affected Work Unit(s) and Human Resources to determine its impact on the workforce diversity within the Work Unit(s).

The Work Unit manager is accountable for documenting the basis for his/her decision in a manner that clearly demonstrates reasonable and consistent application of these factors. The Office of Human Resources will provide consultation to Work Unit managers regarding the effective application and interpretation of state policies and guidelines.

REVIEW AND APPROVAL

The Work Unit manager submits a SHRA RIF Request Form (available in Section XII below) to their executive manager (the Provost, Vice Chancellor for Administration and Finance, Vice Chancellor for Student Affairs, Chief of Staff, Chief Information Officer or Athletic Director, each of whom is referred to as the “Executive Manager”) ultimately responsible for the Work Unit. The Executive Manager then submits a copy of the SHRA RIF Request Form to the Office of Human Resources. The SHRA RIF Request Form must indicate:

the reason(s) for the RIF;

the anticipated date of separation;

name(s) of the employee(s) to be separated due to the RIF and justification for the decision;

a listing of all vacant positions in the Work Unit which are in the same branch/role and competency level with a status of recruitment activity for those positions;

what efforts the Work Unit manager made to avoid the RIF of selected employee(s);

a brief explanation why action other than RIF is not possible;

a management contact; and

any other information that the Executive Manager believes to be relevant to the RIF.

The Office of Human Resources must provide the Work Unit with written approval of the RIF request before any RIF action can be taken.

SHRA permanent employees must receive written notice of RIF at least thirty (30) calendar days prior to their effective separation date. Therefore, the Work Unit manager is expected to submit the SHRA RIF Request Form to the Office of Human Resources at least six (6) weeks prior to the anticipated separation date of any employee to be separated due to the RIF, in order to provide adequate time both for review and the required notification to the employee(s).

BENEFITS PROVIDED TO AFFECTED EMPLOYEES

SHRA permanent employees are entitled to:

One (1) year of employer contributions to the employee's (self-only) health insurance, if eligibility requirements are met; and

Payout of vacation and bonus leave and other applicable paid time-off, upon the date of separation.

In addition, SHRA permanent employees may be eligible for RIF benefits, including:

Up to four (4) months of severance pay based on total state service supplemented by an age adjustment factor (employees qualify for the age adjustment factor at 40 years of age); and

Priority re-employment consideration pursuant to law and policy.

Work Unit managers should consider the total budgetary cost of separating an employee through RIF when determining an appropriate separation date for affected employee(s). If the employee is eligible to receive severance pay, severance payments will be direct-deposited.

NOTIFYING AFFECTED EMPLOYEES

After the SHRA RIF Request Form has been approved by the Office of Human Resources and before the effective date of the RIF, the Work Unit manager provides the following information, in writing, to the employee(s) being separated due to the RIF:

The reason for the RIF;

The effective date of the RIF (must be at least thirty (30) calendar days after the notification date to the employee); and

Notification that the Office of Human Resources will contact them to arrange for a RIF information session, including details on:

The University's policy on priority re-employment;

Completion of necessary application forms;

The availability of aid in seeking other employment;

Eligibility to apply for unemployment insurance benefits;

Other benefits information for separating employees;

The amount of severance pay being requested, if any; and

The right of SHRA permanent employees to appeal the RIF through the University's SHRA Grievance Policy.

REDUCTION OF HOURS (FTE) FOR POSITIONS

To avoid a RIF, a Work Unit manager may consider reducing the regularly scheduled hours for position(s). If so, employees must be given the option of RIF in lieu of reduction in hours. In these situations, any reduction in hours for positions must be included in the Work Unit's SHRA RIF Request Form. This RIF Policy does not apply to routine changes in hours related to contracts and grants management or to an employee request for a voluntary permanent or temporary reduction in hours.

ABOLISHMENT OF POSITION

Once the SHRA RIF Request Form has been approved by the Office of Human Resources, and once any employees have separated or been reassigned, the Work Unit manager must complete the RIF process by abolishing the approved positions pursuant to the SHRA RIF Request Form.

APPEALS

An SHRA permanent employee who has received official notification of RIF may appeal the decision through the procedures established in the University's SHRA Grievance Policy if he/she alleges the following:

That the action taken is the result of a specific violation of this RIF Policy evaluation criteria; and/or

That the action is due to prohibited discrimination based on a protected status of the employee; and/or

That the action is retaliatory because the employee has alleged prohibited harassment or discrimination, has alleged improper government activities (whistleblower protection), or has participated in the grievance process.

An employee cannot grieve management's business decision to take RIF action on the grounds that the action is undesirable or inadvisable.

If an employee who has been separated because of a RIF is not satisfied with the University's final decision on the appeal, the employee may file an appeal with the North Carolina Office of Administrative Hearings in the following situations:

The employee is alleging that the RIF separation was the direct result of retaliation for the employee's opposition to alleged discrimination based on the employee's age, sex, race, color, national origin, religion, political affiliation, or handicapping condition; or

The employee alleges that the separation by RIF is the result of improper application of the veteran's preference policy.

The employee also may forgo utilizing the University's grievance process and appeal directly to the Office of Administrative Hearings if the employee alleges that the RIF action was the direct result of retaliation for the employee's opposition to alleged discrimination as noted above.

POLICY REVIEW

This RIF Policy shall be reviewed and revised as necessary in the event that the North Carolina Office of State Human Resources revises its reduction-in-force policies.

VII. WESTERN CAROLINA UNIVERSITY UNLAWFUL WORKPLACE HARASSMENT (UNLAWFUL HARASSMENT, SEXUAL MISCONDUCT, AND RETALIATION) POLICY

QUICK REFERENCE

ANYONE WHO SUSPECTS CRIMINAL ACTIVITY SHOULD FIRST CALL THE UNIVERSITY POLICE DEPARTMENT AT 828-227-8911 FOR EMERGENCIES OR 828-227-7301 FOR NON-EMERGENCIES.

INDIVIDUALS WHO HAVE COMPLAINTS AGAINST EMPLOYEES, CONTRACTORS, VOLUNTEERS OR AGENTS UNDER THIS POLICY SHOULD CALL THE TITLE IX COORDINATOR AT 828-227-7116.

INDIVIDUALS WHO HAVE COMPLAINTS AGAINST STUDENTS UNDER THIS POLICY SHOULD CALL THE ASSOCIATE VICE CHANCELLOR FOR STUDENT AFFAIRS / DEAN OF STUDENTS AT 828-227-7147.

NOTE

For questions about this policy and general inquiries about Unlawful Discrimination, Sexual Misconduct or Retaliation, contact the WCU Title IX Coordinator:

J. Wesley Chancey, Title IX Coordinator

Phone: 828-227-7116

Email: jwchancey@email.wcu.edu

Website: <https://www.wcu.edu/discover/leadership/office-of-the-chancellor/legal-counsel-office/TitleIX-Office/index.aspx>

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I. POLICY STATEMENT ON UNLAWFUL DISCRIMINATION

Western Carolina University (the "University") is committed to equal opportunity in educational programs and employment for all persons regardless of race, color, religion, sex, sexual orientation, gender identity or expression, national origin, age, disability, genetic information, political affiliation and veteran status. The University is also committed to an inclusive and welcoming environment where scholarship and the exchange of ideas may be freely accomplished. To the fullest extent allowed by law, the University does not permit harassment based on bigotry, slurs and other hateful rhetoric. Additionally, in order to foster participation and

learning, to the fullest extent provided by law, the University does not permit discrimination based on the above classes or characteristics. See Section IV. “Definitions” below for a full description of prohibited conduct.

II. POLICY STATEMENT ON SEXUAL HARASSMENT AND SEXUAL VIOLENCE

Sexual Misconduct, including Sexual Harassment and Sexual Violence, constitutes unlawful discrimination based on gender and threatens the University’s culture of civility and mutual respect. It is the policy of the University that its employees and students should be free from Sexual Misconduct perpetrated by any University employee, student, visitor to the campus, or any agent or contractor having a business, professional, or educational relationship with the University.

The University reaffirms its commitment to academic freedom in accordance with the First Amendment of the United States Constitution and the policies of the University of North Carolina. Where it is an integral and legitimate part of course content, the pedagogical discussion of sexual ideas, taboos, behavior or language is reasonable and shall in no event constitute Sexual Harassment. While the discussion of opinions and ideas related to sexuality may cause some individuals discomfort, it is recognized that academic freedom ensures the free exchange of ideas – an essential part of a functioning democracy.

III. SCOPE AND APPLICATION OF POLICY

It shall be a violation of this Policy for any employee, student, or agent within the University’s control to engage in Unlawful Discrimination, Sexual Misconduct or Retaliation as defined below. Employee sanctions for violating this Policy may include a letter of counseling, a letter of warning, a no contact order, and suspension or termination from employment. Possible student sanctions are contained in the WCU Code of Student Conduct which is incorporated by reference.

The protections afforded under this policy apply to: (1) all applicants for employment; (2) all applicants for admission to the University; (3) University officers, faculty, staff, and students; (4) persons who serve the University as agents

(e.g. volunteers, contractors); and (5) visitors. The University is obligated to respond to reports made under this Policy. The University is also obligated to respond to circumstances of Unlawful Discrimination, Sexual Misconduct or Retaliation for which the University knew or reasonably should have known.

IV. DEFINITIONS

“Protected Status” means characteristics for which an individual is not permitted to suffer undue distinction or unlawful mistreatment as defined below. Those traits include race, color, religion, sex, sexual orientation, gender identity or expression, national origin, age, disability, genetic information, political affiliation and veteran status.

“Unlawful Discrimination” means:

1. Unlawful Discrimination means experiencing disparate treatment based on an individual’s Protected Status. Types of relevant actions include: hiring and firing; compensation, assignment and classification; transfer, promotion or layoff; recruitment; pay, retirement plans and fringe benefits; or altering other terms and conditions of employment or enrollment based on that individual’s Protected Status.
2. Unlawful Discrimination also occurs when a protected individual is subject to a Hostile Environment as defined below.
3. Unlawful Discrimination includes failing to provide reasonable disability, religious, or other legally recognized accommodations where the University has adequate notice of the disability or requested accommodation.

“Reasonable Person” is the viewpoint of a hypothetical individual whose sensibilities, sensitivities and receptiveness to ideas are typical of an individual in the same or similar circumstances.

“Sexual Misconduct” is a type of unlawful discrimination based on gender. It includes Sexual Harassment and Sexual Violence as defined below.

Sexual Misconduct is also defined in the Code of Student Conduct which includes various descriptions of prohibited conduct therein.

“Sexual Harassment” is a type of unlawful discrimination based on gender. In the employment context, behaviors that can lead to Sexual Harassment include but are not limited to, unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature. Sexual Harassment is

unlawful when it constitutes Quid Pro Quo Sexual Harassment or rises to the level of a Hostile Environment. For example:

1. submission to the sexual request or conduct is made either explicitly or implicitly a term or condition of employment (see Quid Pro Quo harassment);
2. submission to or rejection of the sexual request or conduct is used as the basis for an employment decision affecting the individual (see Quid Pro Quo harassment);
3. the sexual request or conduct has the purpose or effect of unreasonably interfering with an employee's work performance or education or creating an intimidating, hostile, or offensive environment (see Hostile Environment);
4. To continue verbal or physical conduct of a sexual nature when an employee or agent has indicated, by word or action that such conduct is unwanted (see Hostile Environment).

With regard to students, Sexual Harassment is defined by the Office of Civil Rights ("OCR") as any unwelcome conduct of a sexual nature that is sufficiently severe, persistent or pervasive that it unreasonably denies, limits or interferes with an individual's ability to participate in an educational program or activity (see Hostile Environment). Additionally, Quid Pro Quo harassment occurs when a University employee causes a student to believe that he or she must submit to unwelcome sexual conduct in order to participate in a University program or activity. Sexual Harassment of students is a form of sex discrimination prohibited by Title IX.

Sexual Harassment as defined above may give rise to a Hostile Environment where there is unwanted conduct related to one's sexual orientation, including being subjected to slurs, demeaning conduct, etc. Mistreatment for failing to conform to one's gender stereotype can also rise to Sexual Harassment. Finally, unwanted conduct related to one's gender identity expression may constitute Sexual Harassment.

"Sexual Violence" is a physical sexual act perpetrated against the person's will or without the victim's lawful Consent. Examples of sexual violence include forcible rape, unwanted fondling, and sexual contact while an individual is Incapacitated or otherwise unable to grant Consent.

NOTE: Sexual Violence also includes criminal acts as defined by NC Law Article 7B § 14-27.20 *et al.* "Rape and Other Sexual Offenses."

“Consent” is approval and permission to engage in mutually agreed upon sexual activity demonstrated by clear actions, words or writings. It is the responsibility of each party to make certain that the other has consented before engaging in sexual activity. Informed consent is freely and voluntarily given and it is mutually understood by all parties involved. An individual who engages in sexual activity when the individual knows, or reasonable should know, that the other person is physically or mental incapacitated has violated this policy. It is not an excuse that the responding party was intoxicated and therefore did not realize the incapacity of the other. If a person is under the age of legal consent, asleep, or Incapacitated as defined, there is no consent. If coercion, intimidation, threats and/or physical force are used, there is no consent. Consent is not to be inferred from silence, passivity, or lack of resistance, and relying on non-verbal communication alone may result in a violation of this policy. Consent is not to be inferred from an existing or previous dating or sexual relationship. Even in the context of a relationship, there must be consent to engage in sexual activity. Consent to some form of sexual activity cannot be automatically taken as consent to any other form of sexual activity. Consent can be withdrawn at any time and requires an outward demonstration through understandable words or actions that clearly conveys that a party is no longer willing to engage in sexual activity. Once consent is withdrawn, the sexual activity must cease immediately.

“Incapacitation” is when a person lacks the mental and/or physical ability to make an informed, rational judgment about whether or not to consent to engage in an activity due to unconsciousness; intermittent consciousness; or lack of awareness. Incapacitation is a state beyond intoxication from alcohol and/or other legal substances. Incapacitation is determined by specific facts associated with the person’s decision-making ability, awareness of consequences, and ability to make informed decisions regarding their health, safety, wants and needs. A person who is incapacitated is unable to grant Consent.

“Hostile Environment” occurs when one experiences unlawful distinction, preference, or harm as compared to others based on that individual’s Protected Status and that it is sufficiently severe, persistent or pervasive enough to unreasonably interfere with deny or limit: 1) an employee’s or applicant for employment’s access to employment or conditions and benefits of employment (e.g., hiring, advancement, assignment); 2) a student’s or admission applicant’s ability to participate in, access, or benefit from educational programs, services, or

activities (e.g., admission, academic standing, grades, assignment, campus housing); or 3) an authorized agent's ability to participate in an agent activity. A Hostile Environment is one that a reasonable person (objective standard) would find hostile or abusive and one that a complainant under this policy perceives to be hostile or abusive (subjective standard). Hostile environment is determined by looking at all of the circumstances, including the frequency of the allegedly harassing conduct, its severity, whether it is physically threatening or humiliating, the extent to which the conduct was intended to harm, harass or exploit the complainant, and whether the conduct actually and substantially interferes with an employee's work performance or a student's ability to participate in or to receive benefits, services, or opportunities in the University's education programs and activities.

“Quid Pro Quo” is Sexual Harassment consisting of unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct when - (1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment or student's academic success, or (2) submission to or rejection of such conduct by an individual is used as the basis for employment decisions or academic decisions affecting such individual.

“Interim Measures” are temporary actions the University may impose to stabilize a situation where there is a reasonably articulated violation of this Policy. Interim Measures may be imposed to stop suspected and ongoing Sexual Misconduct, Unlawful Discrimination or Retaliation. Interim Measures support the people involved in the allegation, including the reporting party, respondents or witnesses. Care will be taken to minimally disrupt the educational experience while addressing the alleged misconduct. Some measure that may be imposed are: 1) access to counseling services; 2) medical services; 3) a no contact order; 4) a campus no trespass order; 5) academic accommodations that are made with agreement of the appropriate faculty who will not be informed of the specific reason for the request with permission of the student (for example rescheduling exams and assignments, providing alternative course completion options, changes in class schedule); 6) changes in work schedule or job assignment; 7) residence modifications; or 8) any other reasonable action as determined by the Title IX Coordinator taken to minimize the impact of suspected Policy violations or the investigation. The Title IX Coordinator at his or her discretion may impose Interim

Measures during either informal or formal resolution of complaints under this Policy.

“Responsible Employee” includes any employee of the University who has been given the duty of reporting incidents of Sexual Violence or any other Sexual Misconduct to the Title IX Coordinator or other appropriate school designee. All University employees are Responsible Employees.

“Retaliation” is mistreatment or any act of reprisal, interference, restraint, coercion, penalty, discrimination, harassment - overtly or covertly - against any applicant for employment, student, employee, volunteer or agent within the University’s control when the person engages in a protected activity. A protected activity includes opposing discrimination or participating in the investigatory process under this policy. Examples of other protected activities include, filing or being a witness to a complaint under this policy or a formal grievance, communicating with a supervisor or manager about unlawful discrimination, answering questions during an investigation, refusing to follow orders that would result in Unlawful Harassment or Sexual Misconduct, requesting a disability accommodation, or availing oneself of rights protected under the Family and Medical Leave Act (“FMLA”).

“Confidential Resources” are offices or agencies, both on campus and off, staffed by trained professionals who can provide counseling, information and support in a confidential setting. Confidential resources will not share information about an individual (including whether that individual has received services) without the individual’s express permission, unless there is a continuing threat of serious harm to the individual or to others or there is a legal obligation to reveal such information (for example, suspected abuse or neglect of a minor). These professionals are available to help an individual make a report to the constituent institution of conduct that violates this policy. The following is a list of confidential resources currently available:

On Campus Resources:

Counseling and Psychological Services (“CAPS”)

225 Bird Bldg.

Western Carolina University

Cullowhee, NC 28723

Non-Emergency Phone: (828) 227-7469

Crisis Clinician: (828) 227-8911

(Students only)

Off Campus Resources:

Western NC 24 Hour Crisis Line: (888) 315-2880

National Suicide Prevention Lifeline: (800) 273-8255

Meridian Health Services

P.O. Box 2187

Sylva, NC 28779

Phone: (828) 631-3973

<https://meridianbhs.org>

REACH of Jackson/Macon Co.

1895 Old Murphy Rd.

Franklin, NC 28734

Phone: (828) 369-5544

<https://www.reachofmaconcounty.org/index.html>

V. COMPLAINTS

A. INFORMAL RESOLUTION OF UNLAWFUL DISCRIMINATION, SEXUAL MISCONDUCT OR RETALIATION

For complaints concerning Unlawful Discrimination, Sexual Misconduct or Retaliation, any party may elect to discuss the problem directly with the person whose behavior is questioned before seeking formal assistance, which is recommended in most circumstances. Confronting the offending party in a conversation or in writing to request that he/she stop engaging in the offensive behavior may resolve the situation. Candid discussion between the parties involved about how a behavior made someone feel can be an empowering experience that overcomes the negative feelings associated with the offending conduct.

The Title IX Coordinator may offer to facilitate informal resolution by acting as a mediator, conducting a limited investigation, working with appropriate University

personnel, and recommending further administrative action in order to resolve the complaint.

For any complaint under this Policy, a reporting party may request that his or her identity remain confidential. The University will evaluate that request in the context of the University's responsibility to provide a safe and nondiscriminatory environment for all students, employees, and third parties in order to determine the steps the University will take to pursue the matter.

Some situations may be so serious that informal resolution may not be appropriate and direct progression to the formal initiation of a complaint may be necessary. For example, if a complaint is directed against a supervisor or administrator who would otherwise play a role in responding to and attempting to resolve the complaint, the employee might not wish to discuss his/her complaint with that supervisor but may elect to discuss the complaint with the next supervisor in a direct line of authority.

NOTE: For applicants to SHRA covered positions and SHRA employees, informal resolution occurs as part of WCU Policy 77 "Grievance Policies and Procedures for SHRA Employees," sub-section V.A. "EEO Informal Inquiry."

B. FORMAL RESOLUTION OF UNLAWFUL DISCRIMINATION, SEXUAL MISCONDUCT OR RETALIATION

Procedures provided under this Policy allow for a prompt, thorough, and impartial investigation and adjudication process that provides appropriate procedural safeguards and adequate due process for all parties.

1. Complaints from Applicants, EHRA Non-Faculty Employees, Faculty, Students, Agents and Visitors Against Other Employees, Agents or Visitors (See Below for Complaints from Applicants to SHRA Positions)

(a) Initiating Section V.B.1 Complaints

Complaints should be reported, preferably in writing, to the Title IX Coordinator at 520 HFR Administration Building, Cullowhee, NC, 28723. The Title IX Coordinator

may be reached by telephone at (828) 227-7116. Complaints should be made within fifteen (15) calendar days of the conduct giving rise to the complaint to ensure a prompt and complete investigation; however, the University reserves the right to initiate investigations and take action at any time depending on the nature of the alleged conduct.

(b) Investigation of Section V.B.1 Complaints

The Title IX Coordinator shall investigate thoroughly and impartially all complaints within forty-five (45) calendar days from the receipt of complaints. The Title IX Coordinator may seek the assistance of other University officials, including the deputy Title IX Coordinators, in situations where there may be actual or perceived conflicts of interest or as otherwise may be necessary to ensure timely, impartial, and complete investigations.

(c) Written Reports /Resolution of Section V.B.1 Complaints

Upon completion of his/her investigation, the Title IX Coordinator shall provide to the applicable Executive Council member a written report of key evidentiary findings, based upon a preponderance of the evidence, whether the alleged conduct constituted a violation of this policy and the Title IX Coordinator's recommended resolutions pertaining to the complaint. The Title IX Coordinator's report is deemed a confidential personnel record of the respondent employee and shall not be disclosed except as required or permitted by law. The applicable member of Executive Council shall be responsible for determining what University action, if any, is warranted.

Upon completion of his/her investigation, the Title IX Coordinator also shall provide a written response to: (1) the complaining employee apprising him/her that the investigation is complete and whether the alleged conduct constituted a violation of this policy; and (2) the respondent employee apprising him/her that the investigation is complete and whether the alleged conduct constituted a violation of this policy.

(d) Internal Appeals of Section V.B.1 Complaint Resolution

Both the complaining employee and the respondent may appeal the Title IX Coordinator's finding(s) and conclusions within fifteen (15) calendar days of receipt of the Title IX Coordinator's written response. Appeals must be in writing and clearly state the basis for the appeal (i.e., that the findings and conclusions are (i) erroneous; (ii) violate applicable federal or state law or university policies; or (iii) the result of a flawed process. Appeals must be directed to the Director of Human Resources at 220 HFR Administration Building, Cullowhee, NC, 28723. The Director of Human Resources may be reached by telephone at (828) 227-7218. The Director of Human Resources shall respond to the appeal within thirty (30) calendar days of receipt, and may either uphold, overturn, or modify the finding(s). No further appeal by either party shall be permitted.

2. Complaints from Applicants for SHRA Covered Positions and SHRA Employees against Other Employees, Agents or Visitors

Complaints, investigations and appeals regarding prohibited conduct under this policy shall be processed in accordance with University Policy 77, "Grievance Policies and Procedures for SHRA Employees"

<https://www.wcu.edu/discover/leadership/office-of-the-chancellor/legal-counsel-office/university-policies/numerical-index/university-policy-77.asp>

3. Complaints Against Students Regarding Discrimination, Unlawful Harassment, Unlawful Sexual Misconduct or Retaliation

This policy references the Code of Student Conduct and relevant portions are incorporated by reference herein. The student code exercises the Chancellor's duty to regulate matters of student conduct in the campus community.

Complaints of this nature should be reported, preferably in writing, to Student Affairs for investigation and appropriate action. The Student Affairs office telephone number is (828) 227-7147, and the office is located in Scott Hall East, Cullowhee, NC 28723. Complaints should be made as soon as possible to ensure a prompt, impartial, and complete investigation.

Complaints should include the name and contact information of the complainant, the specific conduct that is the subject of the complaint, the name and contact

information, if known, of the accused individual, and the name(s) and contact information of witnesses or other individuals having direct knowledge of the complaint.

The University Investigation, Resolution and Appeals associated with the same shall be administered in accordance with the WCU Code of Student Conduct, as incorporated herein by reference.

C. REPORTING CRIMINAL ACTS OR SUSPECTED CRIMINAL ACTIVITY TO UNIVERSITY POLICE AND ANONYMOUS REPORTING

Complaints of criminal acts or suspected criminal activity, including sexual violence, may be filed with the University Police. Individuals should report crimes as soon as possible to the University Police Dispatch Emergency Number (828) 227-8911 or the non-emergency number of (828) 227-7301. In addition to investigating complaints of sexual assault, University Police will refer such cases to the Title IX Coordinator or the Student Affairs and will also refer all such cases to the Jackson County District Attorney.

A student may make an anonymous complaint to University Police through its **Silent Witness** program at: <https://www.wcu.edu/discover/campus-services-and-operations/university-police/how-to-report-a-crime/silent-witness-submit-an-anonymous-report.aspx>

A student may also make an anonymous complaint to University Police by calling the **Police TIPS Line** at: (828) 227-8477.

The University Police have adopted Sexual Assault Investigation Policies to provide officers and investigators with guidelines for responding to reports of sexual assault, assisting victims, collaborating with local health and service agencies, and conducting interviews with victims, witnesses, and suspects. Because of the special needs involved in sexual assault investigations, their policy is an all-inclusive document that covers first response, investigation, and prosecution. The department has a Victim Services Office, which may be contacted at: (828) 227-3207 or (828) 227-7301.

VI. TITLE IX COORDINATOR

In accordance with federal law, the University shall designate a Title IX Coordinator who shall have the following responsibilities:

1. Ultimate oversight of the University's Title IX compliance efforts;
2. Being available to meet with students regarding sexual harassment or sexual assault allegations;
3. Ensuring that complaints are handled through appropriate procedures;
4. Assisting University Police as appropriate in cases of reported sexual violence;
5. Investigating or overseeing the investigation of complaints of sexual harassment or sexual assault;
6. Developing and maintaining a system for tracking and reviewing complaints of sexual harassment and sexual assault;
7. Monitoring and evaluating Title IX compliance in the areas of athletic participation, treatment in athletic programs, and athletic financial assistance;
8. Assisting the Chief Diversity Officer in the administration of periodic campus climate surveys;
9. Assisting in the development or procurement of educational materials addressing sexual harassment, sexual assault, unlawful harassment, and other forms of discriminatory personal conduct; and
10. Assisting in the development and delivery of training on these subjects, including sexual assault prevention.

In all cases except student misconduct, the Title IX Coordinator shall be the primary investigator and adjudicator regarding claims of Unlawful Discrimination, Sexual Misconduct and Retaliation. In cases of student misconduct, the primary investigator is determined under the Code of Student Conduct. The Title IX Coordinator shall appoint deputy Title IX Coordinators, who, in the Title IX Coordinator's discretion, are qualified by education or experience to assist in the investigation and adjudication of complaints. The Title IX Coordinator and all Deputy Title IX Coordinators shall receive at least two (2) hours of training related to Sexual Misconduct and/or other forms of gender-based discrimination annually. Deputy Title IX Coordinators may be tasked with other related obligations (conducting training, etc.).

The Title IX Coordinator's investigation shall be impartial and fair. It is the policy of this University that unbiased investigations are in the best legal interests of the University and the Title IX Coordinator shall never take action designed purely to protect University personnel while investigating claims. The University shall honor the complainant's and respondent's right to due process by notifying the respondent of the allegation(s) and providing each party an opportunity to respond to the allegation, identify potential witnesses and submit documentation. The Title IX Coordinator shall exercise his or her discretion in conducting the investigation in a timely and efficient manner.

VII. SEXUAL VIOLENCE PREVENTION COMMITTEE

The University hereby establishes a standing Sexual Violence Prevention Committee (the "SVPC"). The SVPC shall be comprised of the following members:

1. Title IX Coordinator, who shall serve as chair;
2. Deputy Title IX Coordinators not otherwise listed;
3. Clery Act Coordinator;
4. Chief Diversity Officer;
5. Associate Vice Chancellor for Student Affairs/Dean of Students;
6. Assistant Vice Chancellor for Health and Wellness;
7. Director of Employee Relations;
8. University Police Victim Services Sergeant;
9. Director of the DSCE;
10. Representative from the Department of Athletics appointed by the Athletic Director;
11. A member from the General Counsel's office;
12. A student member appointed by the President of the SGA;
13. A faculty member appointed by the Provost.

The SVPC shall establish such sub-committees as may be necessary to accomplish its objectives and responsibilities. Membership of such sub-committees may include, at a minimum, faculty representatives appointed by the Provost and student representatives appointed by the Vice Chancellor for Student Affairs or his/her designee.

The SVPC shall have the following responsibilities:

1. Serve as an advisory body to the Chancellor on matters pertaining to sexual violence, sexual harassment, and related campus safety;
2. Assist in the development of and recommend policies and implementing procedures regarding sexual violence and related campus community safety, compliance with applicable state and federal laws and regulations, including Title IX, Clery Act, and the Violence Against Women Reauthorization Act of 2013, and compliance with University of North Carolina policies and directives;
3. Assist in the development and delivery of training and professional development for employees;
4. Assist in the development and delivery of information and programming for students, particularly in the areas of awareness and primary prevention, safe and effective intervention strategies, factors that contribute to sexual violence such as alcohol and drugs, and diversity and inclusion;
5. Assist the Division of Student Affairs in maintaining the University website on sexual assault awareness;
6. Assist with the University's community outreach efforts; and
7. Coordinate with faculty, the Title IX Coordinator, and the University's Institutional Review Board to develop and conduct climate and other related surveys/research.

VIII. RETALIATION PROHIBITED

This policy seeks to encourage students, employees and others to report concerns involving discriminatory or harassing personal conduct and accordingly retaliation is prohibited. Any act of reprisal or retaliation, including interference, restraint, coercion, penalty, discrimination, harassment - overtly or covertly - against a student or employee for responsibly reporting under this policy interferes with free expression and violates this policy. Accordingly, individuals who violate this retaliation prohibition may be subject to disciplinary action.

IX. EMPLOYEES' OBLIGATION TO REPORT

Any University employee who experiences, witnesses, reasonably suspects or receives a written or verbal complaint of an incident of Unlawful Discrimination, Sexual Misconduct or Retaliation related to the workplace shall promptly report it

to the Title IX Coordinator. An employee should not presume that the victim or another employee has reported the event unless they have first hand knowledge of the report.

Those employees designated as Campus Security Authorities under University Policy 116 “Clery Act Compliance” are obligated under the law to notify the University Police Department of alleged Clery Crimes that are reported to them (see University Policy 116). All employees are encouraged to report known or suspected crimes to law enforcement to the extent provided by law and according to appropriate professional standards.

All University employees are designated as “Responsible Employees” under Title IX and are legally obligated to report known or suspected incidents of Sexual Misconduct to the Title IX Coordinator.

In some instances, employees with legally recognized professional privileges may not be subject to mandatory reporting under Section IX. The Title IX Coordinator with Legal Counsel shall delineate these individuals’ reporting obligations by an official memorandum to the department.

X. FRIVOLOUS OR FALSE COMPLAINTS

This policy shall not be used to bring frivolous or false complaints. If a complaint has been made maliciously or in bad faith, disciplinary action may be taken against the person bringing the complaint.

XI. CONFIDENTIALITY OF INVESTIGATIONS AND RECORDS

Information gathered in the course of investigations conducted under this policy will be given the full extent of confidentiality accorded by law to employee personnel records and student education records. Any person who, without authorization, reveals such information may be subject to disciplinary action. Disclosure of the content of complaints will be made on a “need to know” basis, depending on the type of investigation and remedial action required by the complaint. In any event, the accused individual will be informed of the specific allegations in the complaint.

XII. REPORTS TO CHANCELLOR

The Title IX Coordinator is responsible for routinely and periodically reporting to the Chancellor the number and nature of complaints made under this policy.

XIII. RELATED POLICIES AND RESOURCES

University Policy #10, Equal Opportunity Programs,
University Policy #58, Improper Relationships between Students and Employees
University Policy #77, Grievance Policies and Procedures for SHRA Employees
University Policy #109, Campus/Workplace Violence Prevention and
Management,
University Policy # 116, Clery Act Compliance

VIII. PROGRAM OBJECTIVES

Statistical Analyses

This section contains charts of all statistical information relevant to Western Carolina University's EEO Plan reporting. Specifically, please find the following pages that show the workforce analysis along with the program objectives for each occupational category. Job opening projections take into account the data on permanent staff openings filled for the seven-year period ending September 30, 2017. Please note that numerous circumstances can impact work force projections by race, sex and occupational category so that these are not always precise. Economic changes and turnover cause such projections to be estimates.

Workforce Profile

Job Group Analysis Summary

Factor Availabilities

Availability Analysis

Incumbency v. Estimated Availability Detail Report

Incumbency v. Estimated Availability Less than Reasonably Expected

Annual Placement Goals

Incumbency v. Goal – benchmark (Disability – Veteran) Summary

Goals – Benchmarks (Disability – Veteran)

Job Opening Estimates for Occupations in Which Underutilization Occurs

Recruitment & Selection Analysis

WORK FORCE PROFILE (10/1/2018)

Job Group	Sex	White	%	Minority	%	Total Number	%
100 Executives & Administrators	Male	29	1.9%	6	0.4%	35	2.3%
	Female	19	1.2%	2	0.1%	21	1.3%
	Total	48	3.1%	8	0.5%	56	3.6%
200 Engineering & Technology	Male	15	1.0%	9	0.6%	24	1.5%
	Female	1	0.1%	1	0.1%	2	0.2%
	Total	16	1.1%	10	0.6%	26	1.7%
205 Fine & Perf. Arts	Male	34	2.2%	3	0.2%	37	2.4%
	Female	20	1.3%	0	0.0%	20	1.3%
	Total	54	3.5%	3	0.2%	57	3.7%
210 Health & Human Scs.	Male	17	1.0%	1	0.1%	18	1.1%
	Female	71	4.6%	5	0.3%	76	4.9%
	Total	88	5.6%	6	0.4%	94	6.0%
220 Arts & Sciences	Male	106	6.8%	17	1.1%	123	7.9%
	Female	85	5.4%	9	0.6%	94	6.0%
	Total	191	12.2%	26	1.7%	217	13.9%
230 Business	Male	30	1.9%	8	0.5%	38	2.4%
	Female	19	1.2%	2	0.1%	21	1.3%
	Total	49	3.1%	10	0.6%	59	3.7%
240 Education & Allied Prof.	Male	29	1.9%	4	0.2%	33	2.1%
	Female	52	3.3%	4	0.2%	56	3.6%
	Total	81	5.2%	8	0.5%	89	5.7%
250 Library	Male	2	0.1%	0	0.0%	2	0.1%
	Female	15	1.0%	0	0.0%	15	1.0%
	Total	17	1.1%	0	0.0%	17	1.1%
260 Athletics	Male	28	1.8%	7	0.5%	35	2.3%
	Female	8	0.5%	2	0.1%	10	0.6%
	Total	36	2.3%	9	0.6%	45	2.9%
300 Professional	Male	135	8.6%	18	1.1%	153	9.8%
	Female	178	11.4%	26	1.7%	204	13.1%
	Total	313	20.0%	44	2.9%	357	22.9%
400 Technical	Male	77	4.9%	4	0.2%	81	5.2%
	Female	34	2.2%	7	0.5%	41	2.6%
	Total	111	7.1%	11	0.7%	122	7.8%
500 Administrative Support	Male	8	0.5%	3	0.2%	11	0.7%
	Female	140	9.0%	6	0.4%	146	9.4%
	Total	148	9.5%	9	0.6%	157	10.1%
600 Skilled Crafts	Male	74	4.7%	3	0.2%	77	4.9%
	Female	6	0.4%	0	0.0%	6	0.4%
	Total	80	5.1%	3	0.2%	83	5.3%
700 Safety & Security	Male	26	1.7%	2	0.1%	28	1.8%
	Female	6	0.4%	0	0.0%	6	0.4%
	Total	32	2.1%	2	0.1%	34	2.2%
800 Other Auxiliary Services	Male	83	5.3%	8	0.5%	91	5.8%
	Female	56	3.6%	2	0.1%	58	3.7%
	Total	139	8.9%	10	0.6%	149	9.5%
Totals	Male	693	44.4%	93	6.0%	786	50.3%
	Female	710	45.4%	66	4.2%	776	49.7%
	Total	1,403	89.8%	159	10.2%	1,562	100.0%

Job Group Analysis Summary

Job Group	Total	Female		Total Min		Black		Hisp		Asian		Amlnd		NHOPi		Two+	
		#	%	#	%	#	%	#	%	#	%	#	%	#	%	#	%
100 Administrators	56	21	37.50	8	14.29	4	7.14	1	1.79	0	0.00	2	3.57	0	0.00	1	1.79
200 Faculty, Eng & Technology	26	2	7.69	10	38.46	0	0.00	1	3.85	9	34.62	0	0.00	0	0.00	0	0.00
205 Faculty, Fine & Perf Arts	57	20	35.09	3	5.26	0	0.00	0	0.00	1	1.75	1	1.75	0	0.00	1	1.75
210 Faculty, HHS	94	76	80.85	6	6.38	1	1.06	2	2.13	1	1.06	0	0.00	0	0.00	2	2.13
220 Faculty, Arts & Sciences	217	94	43.32	26	11.98	2	0.92	3	1.38	12	5.53	2	0.92	0	0.00	7	3.23
230 Faculty, Business	59	21	35.59	10	16.95	1	1.69	2	3.39	7	11.86	0	0.00	0	0.00	0	0.00
240 Faculty, Education	89	56	62.92	8	8.99	4	4.49	0	0.00	1	1.12	0	0.00	0	0.00	3	3.37
250 Library	17	15	88.24	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
260 Athletics	45	10	22.22	9	20.00	7	15.56	0	0.00	0	0.00	2	4.44	0	0.00	0	0.00
300 Other Professionals	357	204	57.14	44	12.32	14	3.92	8	2.24	4	1.12	5	1.40	0	0.00	13	3.64
400 Technicians & Para	122	41	33.61	11	9.02	1	0.82	3	2.46	4	3.28	1	0.82	0	0.00	2	1.64
500 Office Support & Clerical	157	146	92.99	9	5.73	1	0.64	1	0.64	0	0.00	1	0.64	0	0.00	6	3.82
600 Skilled Craft Workers	83	6	7.23	3	3.61	0	0.00	1	1.20	0	0.00	1	1.20	0	0.00	1	1.20
700 Safety & Security	34	6	17.65	2	5.88	1	2.94	0	0.00	0	0.00	0	0.00	0	0.00	1	2.94
800 Other Auxiliary Services	149	58	38.93	10	6.71	6	4.03	1	0.67	0	0.00	1	0.67	0	0.00	2	1.34
910 Temporary-Adjunct	210	119	56.67	16	7.62	5	2.38	4	1.90	5	2.38	0	0.00	0	0.00	2	0.95
920 Temporary-Staff	135	70	51.85	17	12.59	3	2.22	3	2.22	2	1.48	3	2.22	0	0.00	6	4.44
Facility Total % of Facility Total	1907	965	50.60	192	10.07	50	2.62	30	1.57	46	2.41	19	1.00	0	0.00	47	2.46

Factor Availabilities

Job Group	Female (%)	Minority (%)	Black (%)	Hisp (%)	Asian (%)	AmInd (%)	NHOPi (%)	Two+ (%)
Factor 1 - Requisite Skills in Reasonable Recruiting Area								
100 Administrators <i>Labor Area: United States</i>	38.21	21.37	7.02	7.92	5.08	0.80	0.10	0.46
200 Faculty, Eng & Technology <i>Labor Area: SED (1998-2008)</i>	16.85	30.73	3.87	3.84	18.79	0.45	0.00	3.79
205 Faculty, Arts & Sciences <i>Labor Area: SED (1998-2008)</i>	56.51	17.93	5.30	3.46	5.47	0.41	0.00	3.30
210 Faculty, HHS <i>Labor Area: SED (1998-2008)</i>	68.75	22.79	8.73	4.11	6.71	0.49	0.00	2.74
220 Faculty, Arts & Sciences <i>Labor Area: SED (1998-2008)</i>	41.89	21.15	4.04	4.45	8.81	0.40	0.00	3.44
230 Faculty, Business <i>Labor Area: SED (1998-2008)</i>	38.86	25.39	7.46	3.84	10.21	0.67	0.00	3.22
240 Faculty, Education <i>Labor Area: SED (1998-2008)</i>	69.12	22.97	10.76	4.67	3.68	0.77	0.00	3.08
250 Library <i>Labor Area: SED (1998-2008)</i>	63.14	26.15	9.96	3.74	6.85	1.49	0.00	4.11
260 Athletics <i>Labor Area: United States</i>	47.20	22.24	6.54	8.90	5.28	0.77	0.10	0.65
300 Other Professionals <i>Labor Area: United States</i>	64.30	26.69	10.39	9.02	5.76	0.84	0.12	0.56
400 Technicians & Para <i>Labor Area: Custom - 4 county recruitment area</i>	44.00	15.04	0.30	0.65	9.14	4.93	0.00	0.02
500 Office Support & Clerical <i>Labor Area: Custom - 4 county recruitment area</i>	77.50	5.83	1.32	2.36	0.22	1.93	0.00	0.00
600 Skilled Craft Workers <i>Labor Area: Custom - 4 county recruitment area</i>	5.43	5.55	1.47	2.79	0.70	0.00	0.00	0.59
700 Safety & Security <i>Labor Area: Custom - 4 county recruitment area</i>	27.75	12.53	4.63	4.63	0.00	3.28	0.00	0.00
800 Other Auxiliary Services <i>Labor Area: Custom - 4 county recruitment area</i>	44.27	12.76	1.15	5.19	0.09	3.35	0.00	2.97
910 Temporary-Adjunct <i>Labor Area: Custom - 4 county recruitment area</i>	73.50	5.11	0.80	2.10	1.68	0.53	0.00	0.00
920 Temporary-Staff <i>Labor Area: Custom - 4 county recruitment area</i>	54.78	7.56	1.09	2.48	0.97	2.71	0.00	0.13

Factor Availabilities

Job Group	Female (%)	Minority (%)	Black (%)	Hisp (%)	Asian (%)	AmInd (%)	NHOPI (%)	Two+ (%)
Factor 2 - Promotable, Transferable, and Trainable within Organization								
100 Administrators	48.12	13.37	3.07	1.44	6.34	0.95	0.00	1.57
200 Faculty, Eng & Technology	3.64	36.59	0.00	1.82	34.77	0.00	0.00	0.00
205 Faculty, Arts & Sciences	21.26	0.83	0.00	0.00	0.83	0.00	0.00	0.00
210 Faculty, HHS	86.36	1.69	0.28	0.56	0.28	0.00	0.00	0.56
220 Faculty, Arts & Sciences	29.06	20.02	0.40	0.89	3.75	13.00	0.00	1.98
230 Faculty, Business	35.88	15.76	1.75	1.75	12.25	0.00	0.00	0.00
240 Faculty, Education	61.96	7.48	2.27	0.00	0.76	0.00	0.00	4.45
250 Library	88.00	1.00	0.00	0.00	0.00	0.00	0.00	1.00
260 Athletics	22.22	18.00	14.67	0.00	0.00	3.33	0.00	0.00
300 Other Professionals	52.26	13.35	4.14	2.50	1.24	1.08	0.00	4.40
400 Technicians & Para	43.43	8.94	0.08	5.19	1.33	0.08	0.00	2.26
500 Office Support & Clerical	58.91	6.37	0.71	2.06	0.00	0.37	0.00	3.24
600 Skilled Craft Workers	10.44	4.69	0.30	1.83	0.00	0.73	0.00	1.84
700 Safety & Security	21.11	6.67	6.67	0.00	0.00	0.00	0.00	0.00
800 Other Auxiliary Services	30.89	4.55	0.51	1.85	0.00	0.17	0.00	2.02
910 Temporary-Adjunct	-	-	-	-	-	-	-	-
920 Temporary-Staff	-	-	-	-	-	-	-	-

Availability Analysis

Job Group: 100 Administrators

**WCU (2018-2019 EEO Plan)
10/01/2018**

Factor	Raw Statistics (%)								Value Weight	Weighted Factor (%)							
	Female	Total Min	Black	Hisp	Asian	AmInd	NHOPI	Two+		Female	Total Min	Black	Hisp	Asian	AmInd	NHOPI	Two+
1 Percentage of Minorities and Women Among Those Having Requisite Skills in the Reasonable Recruitment Area	38.21	21.37	7.02	7.92	5.08	0.80	0.10	0.46	80.00	30.57	17.10	5.62	6.33	4.07	0.64	0.08	0.36
	Source of Data: Census 2010 Special EEO File United States																
2 Percentage of Minorities and Women Among Those Promotable, Transferable and Trainable within the Contractor's Organization	48.12	13.37	3.07	1.44	6.34	0.95	0.00	1.57	20.00	9.62	2.67	0.61	0.29	1.27	0.19	0.00	0.31
	Source of Data: Feeder Job Groups: Faculty, Eng & Technology (200), Faculty, Fine & Perf Arts (205), Faculty, HHS (210), Faculty, Arts & Sciences (220), Faculty, Business (230), Faculty, Education (240), Library (250), Athletics (260), Other Professionals (300)																
100.00																	
										40.19	19.77	6.23	6.62	5.33	0.83	0.08	0.68

Availability Analysis

Job Group: 200 Faculty, Eng. & Technology

**WCU (2018-2019 EEO Plan)
10/01/2018**

Factor	Raw Statistics (%)								Value Weight	Weighted Factor (%)							
	Female	Total Min	Black	Hisp	Asian	Amlnd	NHOPI	Two+		Female	Total Min	Black	Hisp	Asian	Amlnd	NHOPI	Two+
1 Percentage of Minorities and Women Among Those Having Requisite Skills in the Reasonable Recruitment Area	16.85	30.73	3.87	3.84	18.79	0.45	0.00	3.79	85.00	14.32	26.12	3.29	3.27	15.97	0.38	0.00	3.22
	Source of Data: Census 2010 Special EEO File SED (1998-2008)																
2 Percentage of Minorities and Women Among Those Promotable, Transferable and Trainable within the Contractor's Organization	3.64	36.59	0.00	1.82	34.77	0.00	0.00	0.00	15.00	0.55	5.49	0.00	0.27	5.22	0.00	0.00	0.00
	Source of Data: Feeder Job Titles																
									100.00								
										14.86	31.61	3.29	3.54	21.18	0.38	0.00	3.22

Availability Analysis

Job Group: 205 Faculty, Fine & Perf Arts

**WCU (2018-2019 EEO Plan)
10/01/2018**

Factor	Raw Statistics (%)								Value Weight	Weighted Factor (%)							
	Female	Total Min	Black	Hisp	Asian	AmInd	NHOPI	Two+		Female	Total Min	Black	Hisp	Asian	AmInd	NHOPI	Two+
1 Percentage of Minorities and Women Among Those Having Requisite Skills in the Reasonable Recruitment Area	56.51	17.93	5.30	3.46	5.47	0.41	0.00	3.30	85.00	48.03	15.24	4.50	2.94	4.65	0.35	0.00	2.80
	Source of Data: Census 2010 Special EEO File SED (1998-2008)																
2 Percentage of Minorities and Women Among Those Promotable, Transferable and Trainable within the Contractor's Organization	21.26	0.83	0.00	0.00	0.83	0.00	0.00	0.00	15.00	3.19	0.13	0.00	0.00	0.13	0.00	0.00	0.00
	Source of Data: Feeder Job Titles																
100.00																	
									51.22	15.37	4.50	2.94	4.77	0.35	0.00	2.80	

Availability Analysis

Job Group: 210 Faculty, HHS

**WCU (2018-2019 EEO Plan)
10/01/2018**

Factor	Raw Statistics (%)								Value Weight	Weighted Factor (%)							
	Female	Total Min	Black	Hisp	Asian	AmInd	NHOPI	Two+		Female	Total Min	Black	Hisp	Asian	AmInd	NHOPI	Two+
1 Percentage of Minorities and Women Among Those Having Requisite Skills in the Reasonable Recruitment Area	68.75	22.79	8.73	4.11	6.71	0.49	0.00	2.74	85.00	58.44	19.37	7.42	3.49	5.70	0.42	0.00	2.33
	Source of Data: Census 2010 Special EEO File SED (1998-2008)																
2 Percentage of Minorities and Women Among Those Promotable, Transferable and Trainable within the Contractor's Organization	86.36	1.69	0.28	0.56	0.28	0.00	0.00	0.56	15.00	12.95	0.25	0.04	0.08	0.04	0.00	0.00	0.08
	Source of Data: Feeder Job Titles																
100.00																	
									71.39	19.62	7.47	3.58	5.75	0.42	0.00	2.41	

Availability Analysis

Job Group: 220 Faculty, Arts & Sciences

**WCU (2018-2019 EEO Plan)
10/01/2018**

Factor	Raw Statistics (%)								Value Weight	Weighted Factor (%)							
	Female	Total Min	Black	Hisp	Asian	AmInd	NHOPI	Two+		Female	Total Min	Black	Hisp	Asian	AmInd	NHOPI	Two+
1 Percentage of Minorities and Women Among Those Having Requisite Skills in the Reasonable Recruitment Area	41.89	21.15	4.04	4.45	8.81	0.40	0.00	3.44	85.00	35.61	17.97	3.43	3.78	7.49	0.34	0.00	2.92
	Source of Data: Census 2010 Special EEO File SED (1998-2008)																
2 Percentage of Minorities and Women Among Those Promotable, Transferable and Trainable within the Contractor's Organization	29.06	20.02	0.40	0.89	3.75	13.00	0.00	1.98	15.00	4.36	3.00	0.06	0.13	0.56	1.95	0.00	0.30
	Source of Data: Feeder Job Titles																
100.00																	
									39.97	20.98	3.49	3.92	8.05	2.29	0.00	3.22	

Availability Analysis

Job Group: 230 Faculty, Business

**WCU (2018-2019 EEO Plan)
10/01/2018**

Factor	Raw Statistics (%)								Value Weight	Weighted Factor (%)							
	Female	Total Min	Black	Hisp	Asian	AmInd	NHOPI	Two+		Female	Total Min	Black	Hisp	Asian	AmInd	NHOPI	Two+
1 Percentage of Minorities and Women Among Those Having Requisite Skills in the Reasonable Recruitment Area	38.86	25.39	7.46	3.84	10.21	0.67	0.00	3.22	85.00	33.03	21.58	6.34	3.26	8.67	0.57	0.00	2.74
	Source of Data: Census 2010 Special EEO File SED (1998-2008)																
2 Percentage of Minorities and Women Among Those Promotable, Transferable and Trainable within the Contractor's Organization	35.88	15.76	1.75	1.75	12.25	0.00	0.00	0.00	15.00	5.38	2.36	0.26	0.26	1.84	0.00	0.00	0.00
	Source of Data: Feeder Job Titles																
100.00																	
									38.41	23.94	6.60	3.52	10.51	0.57	0.00	2.74	

Availability Analysis

Job Group: 240 Faculty, Education

**WCU (2018-2019 EEO Plan)
10/01/2018**

Factor	Raw Statistics (%)								Value Weight	Weighted Factor (%)							
	Female	Total Min	Black	Hisp	Asian	AmInd	NHOPI	Two+		Female	Total Min	Black	Hisp	Asian	AmInd	NHOPI	Two+
1 Percentage of Minorities and Women Among Those Having Requisite Skills in the Reasonable Recruitment Area	69.12	22.97	10.76	4.67	3.68	0.77	0.00	3.08	85.00	58.75	19.52	9.15	3.97	3.13	0.65	0.00	2.62
	Source of Data: Census 2010 Special EEO File SED (1998-2008)																
2 Percentage of Minorities and Women Among Those Promotable, Transferable and Trainable within the Contractor's Organization	61.96	7.48	2.27	0.00	0.76	0.00	0.00	4.45	15.00	9.29	1.12	0.34	0.00	0.11	0.00	0.00	0.67
	Source of Data: Feeder Job Titles																
100.00																	
									68.05	20.64	9.49	3.97	3.25	0.65	0.00	3.28	

Availability Analysis

Job Group: 250 Library

**WCU (2018-2019 EEO Plan)
10/01/2018**

Factor	Raw Statistics (%)								Value Weight	Weighted Factor (%)							
	Female	Total Min	Black	Hisp	Asian	AmInd	NHOPI	Two+		Female	Total Min	Black	Hisp	Asian	AmInd	NHOPI	Two+
1 Percentage of Minorities and Women Among Those Having Requisite Skills in the Reasonable Recruitment Area	63.14	26.15	9.96	3.74	6.85	1.49	0.00	4.11	90.00	56.82	23.54	8.97	3.36	6.16	1.34	0.00	3.70
	Source of Data: Census 2010 Special EEO File SED (1998-2008)																
2 Percentage of Minorities and Women Among Those Promotable, Transferable and Trainable within the Contractor's Organization	88.00	1.00	0.00	0.00	0.00	0.00	0.00	1.00	10.00	8.80	0.10	0.00	0.00	0.00	0.00	0.00	0.10
	Source of Data: Feeder Job Titles																
100.00																	
									65.62	23.64	8.97	3.36	6.16	1.34	0.00	3.80	

Availability Analysis

Job Group: 260 Athletics

**WCU (2018-2019 EEO Plan)
10/01/2018**

Factor	Raw Statistics (%)								Value Weight	Weighted Factor (%)							
	Female	Total Min	Black	Hisp	Asian	AmInd	NHOPI	Two+		Female	Total Min	Black	Hisp	Asian	AmInd	NHOPI	Two+
1 Percentage of Minorities and Women Among Those Having Requisite Skills in the Reasonable Recruitment Area	47.20	22.24	6.54	8.90	5.28	0.77	0.10	0.65	90.00	42.48	20.01	5.88	8.01	4.75	0.69	0.09	0.58
	Source of Data: Census 2010 Special EEO File United States																
2 Percentage of Minorities and Women Among Those Promotable, Transferable and Trainable within the Contractor's Organization	22.22	18.00	14.67	0.00	0.00	3.33	0.00	0.00	10.00	2.22	1.80	1.47	0.00	0.00	0.33	0.00	0.00
	Source of Data: Feeder Job Titles																
100.00																	
									44.70	21.81	7.35	8.01	4.75	1.03	0.09	0.58	

Availability Analysis

Job Group: 300 Other Professionals

**WCU (2018-2019 EEO Plan)
10/01/2018**

Factor	Raw Statistics (%)								Value Weight	Weighted Factor (%)							
	Female	Total Min	Black	Hisp	Asian	AmInd	NHOPI	Two+		Female	Total Min	Black	Hisp	Asian	AmInd	NHOPI	Two+
1 Percentage of Minorities and Women Among Those Having Requisite Skills in the Reasonable Recruitment Area	64.30	26.69	10.39	9.02	5.76	0.84	0.12	0.56	75.00	48.23	20.02	7.79	6.77	4.32	0.63	0.09	0.42
	Source of Data: Census 2010 Special EEO File United States																
2 Percentage of Minorities and Women Among Those Promotable, Transferable and Trainable within the Contractor's Organization	52.26	13.35	4.14	2.50	1.24	1.08	0.00	4.40	25.00	13.07	3.34	1.03	0.62	0.31	0.27	0.00	1.10
	Source of Data: Feeder Job Titles																
100.00																	
									61.29	23.36	8.83	7.39	4.63	0.90	0.09	1.52	

Availability Analysis

Job Group: 400 Technicians & Para

**WCU (2018-2019 EEO Plan)
10/01/2018**

Factor	Raw Statistics (%)								Value Weight	Weighted Factor (%)							
	Female	Total Min	Black	Hisp	Asian	Amlnd	NHOPI	Two+		Female	Total Min	Black	Hisp	Asian	Amlnd	NHOPI	Two+
1 Percentage of Minorities and Women Among Those Having Requisite Skills in the Reasonable Recruitment Area	44.00	15.04	0.30	0.65	9.14	4.93	0.00	0.02	75.00	33.00	11.28	0.22	0.49	6.85	3.70	0.00	0.01
	Source of Data: Census 2010 Special EEO File 4 county recruitment area																
2 Percentage of Minorities and Women Among Those Promotable, Transferable and Trainable within the Contractor's Organization	43.43	8.94	0.08	5.19	1.33	0.08	0.00	2.26	25.00	10.86	2.24	0.02	1.30	0.33	0.02	0.00	0.57
	Source of Data: Feeder Job Titles																
100.00																	
									43.86	13.52	0.24	1.79	7.18	3.72	0.00	0.58	

Availability Analysis

Job Group: 500 Office Support & Clerical

**WCU (2018-2019 EEO Plan)
10/01/2018**

Factor	Raw Statistics (%)								Value Weight	Weighted Factor (%)							
	Female	Total Min	Black	Hisp	Asian	Amlnd	NHOPI	Two+		Female	Total Min	Black	Hisp	Asian	Amlnd	NHOPI	Two+
1 Percentage of Minorities and Women Among Those Having Requisite Skills in the Reasonable Recruitment Area	77.50	5.83	1.32	2.36	0.22	1.93	0.00	0.00	75.00	58.12	4.37	0.99	1.77	0.16	1.45	0.00	0.00
	Source of Data: Census 2010 Special EEO File 4 county recruitment area																
2 Percentage of Minorities and Women Among Those Promotable, Transferable and Trainable within the Contractor's Organization	58.91	6.37	0.71	2.06	0.00	0.37	0.00	3.24	25.00	14.73	1.59	0.18	0.51	0.00	0.09	0.00	0.81
	Source of Data: Feeder Job Titles																
100.00																	
										72.85	5.96	1.17	2.28	0.16	1.54	0.00	0.81

Availability Analysis

Job Group: 600 Skilled Craft Workers

**WCU (2018-2019 EEO Plan)
10/01/2018**

Factor	Raw Statistics (%)								Value Weight	Weighted Factor (%)							
	Female	Total Min	Black	Hisp	Asian	AmInd	NHOPi	Two+		Female	Total Min	Black	Hisp	Asian	AmInd	NHOPi	Two+
1 Percentage of Minorities and Women Among Those Having Requisite Skills in the Reasonable Recruitment Area	5.43	5.55	1.47	2.79	0.70	0.00	0.00	0.59	70.00	3.80	3.89	1.03	1.95	0.49	0.00	0.00	0.41
	Source of Data: Census 2010 Special EEO File 4 county recruitment area																
2 Percentage of Minorities and Women Among Those Promotable, Transferable and Trainable within the Contractor's Organization	10.44	4.69	0.30	1.83	0.00	0.73	0.00	1.84	30.00	3.13	1.41	0.09	0.55	0.00	0.22	0.00	0.55
	Source of Data: Feeder Job Titles																
100.00																	
									6.94	5.29	1.12	2.50	0.49	0.22	0.00	0.96	

Availability Analysis

Job Group: 700 Safety & Security

**WCU (2018-2019 EEO Plan)
10/01/2018**

Factor	Raw Statistics (%)								Value Weight	Weighted Factor (%)							
	Female	Total Min	Black	Hisp	Asian	Amlnd	NHOPI	Two+		Female	Total Min	Black	Hisp	Asian	Amlnd	NHOPI	Two+
1 Percentage of Minorities and Women Among Those Having Requisite Skills in the Reasonable Recruitment Area	27.75	12.53	4.63	4.63	0.00	3.28	0.00	0.00	80.00	22.20	10.03	3.70	3.70	0.00	2.62	0.00	0.00
	Source of Data: Census 2010 Special EEO File 4 county recruitment area																
2 Percentage of Minorities and Women Among Those Promotable, Transferable and Trainable within the Contractor's Organization	21.11	6.67	6.67	0.00	0.00	0.00	0.00	0.00	20.00	4.22	1.33	1.33	0.00	0.00	0.00	0.00	0.00
	Source of Data: Feeder Job Titles																
100.00																	
									26.43	11.36	5.03	3.70	0.00	2.62	0.00	0.00	

Availability Analysis

Job Group: 800 Other Auxiliary Services

**WCU (2018-2019 EEO Plan)
10/01/2018**

Factor	Raw Statistics (%)								Value Weight	Weighted Factor (%)							
	Female	Total Min	Black	Hisp	Asian	Amlnd	NHOPI	Two+		Female	Total Min	Black	Hisp	Asian	Amlnd	NHOPI	Two+
1 Percentage of Minorities and Women Among Those Having Requisite Skills in the Reasonable Recruitment Area	44.27	12.76	1.15	5.19	0.09	3.35	0.00	2.97	70.00	30.99	8.93	0.81	3.63	0.07	2.35	0.00	2.08
	Source of Data: Census 2010 Special EEO File 4 county recruitment area																
2 Percentage of Minorities and Women Among Those Promotable, Transferable and Trainable within the Contractor's Organization	30.89	4.55	0.51	1.85	0.00	0.17	0.00	2.02	30.00	9.27	1.36	0.15	0.56	0.00	0.05	0.00	0.61
	Source of Data: Feeder Job Titles																
100.00																	
									40.25	10.29	0.96	4.19	0.07	2.40	0.00	2.68	

Availability Analysis

Job Group: 910 Temporary – Adjunct

**WCU (2018-2019 EEO Plan)
10/01/2018**

Factor	Raw Statistics (%)								Value Weight	Weighted Factor (%)							
	Female	Total Min	Black	Hisp	Asian	AmInd	NHOPI	Two+		Female	Total Min	Black	Hisp	Asian	AmInd	NHOPI	Two+
1 Percentage of Minorities and Women Among Those Having Requisite Skills in the Reasonable Recruitment Area	73.50	5.11	0.80	2.10	1.68	0.53	0.00	0.00	100.00	73.50	5.11	0.80	2.10	1.68	0.53	0.00	0.00
	Source of Data: Census 2010 Special EEO File 4 county recruitment area																
2 Percentage of Minorities and Women Among Those Promotable, Transferable and Trainable within the Contractor's Organization	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
100.00																	
									73.50	5.11	0.80	2.10	1.68	0.53	0.00	0.00	

Availability Analysis

Job Group: 920 Temporary – Staff

**WCU (2018-2019 EEO Plan)
10/01/2018**

Factor	Raw Statistics (%)								Value Weight	Weighted Factor (%)							
	Female	Total Min	Black	Hisp	Asian	AmInd	NHOPI	Two+		Female	Total Min	Black	Hisp	Asian	AmInd	NHOPI	Two+
1 Percentage of Minorities and Women Among Those Having Requisite Skills in the Reasonable Recruitment Area	54.78	7.56	1.09	2.48	0.97	2.71	0.00	0.31	100.00	54.78	7.56	1.09	2.48	0.97	2.71	0.00	0.31
	Source of Data: Census 2010 Special EEO File 4 county recruitment area																
2 Percentage of Minorities and Women Among Those Promotable, Transferable and Trainable within the Contractor's Organization	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
100.00																	
									54.78	7.56	1.09	2.48	0.97	2.71	0.00	0.31	

Incumbency v. Estimated Availability Detail

Job Group	Total Incumbents (#)	Category	Incumbents (#)	Incumbency (%)	Availability (%)	Expected Incumbents (#)	Difference (#) Exp. minus Inc.	Number of Standard Deviations	Less than Reasonably Expected?
100 Administrators	56	Female	21	37.50	40.19	22.5	-1.5	-0.41	
		Minority	8	14.29	19.77	11.1	-3.1	-1.03	
		Black	4	7.14	6.23	3.5	0.5	0.28	
		Hispanic	1	1.79	6.62	3.7	-2.7	-1.46	
		Asian	0	0.00	5.33	3.0	-3.0	-1.78	
		AmIndian	2	3.57	0.83	0.5	1.5	2.27	
		NHOPI	0	0.00	0.08	0.0	0.0	-0.21	
		Two+	1	1.79	0.68	0.4	0.6	1.01	
200 Faculty, Eng & Technology	26	Female	2	7.69	14.86	3.9	-1.9	-1.03	
		Minority	10	38.46	31.61	8.2	1.8	0.75	
		Black	0	0.00	3.29	0.9	-0.9	-0.94	
		Hispanic	1	3.85	3.54	0.9	0.1	0.08	
		Asian	9	34.62	21.18	5.5	3.5	1.68	
		AmIndian	0	0.00	0.38	0.1	-0.1	-0.31	
		NHOPI	0	0.00	0.00	0.0	0.0	0.00	
		Two+	0	0.00	3.22	0.8	-0.8	-0.93	
205 Faculty, Arts & Sciences	57	Female	20	35.09	51.22	29.2	-9.2	-2.44	Yes
		Minority	3	5.26	15.37	8.8	-5.8	-2.11	Yes
		Black	0	0.00	4.50	2.6	-2.6	-1.64	
		Hispanic	0	0.00	2.94	1.7	-1.7	-1.31	
		Asian	1	1.75	4.77	2.7	-1.7	-1.07	
		AmIndian	1	1.75	0.35	0.2	0.8	1.80	
		NHOPI	0	0.00	0.00	0.0	0.0	0.00	
		Two+	1	1.75	2.80	1.6	-0.6	-0.48	
210 Faculty, HHS	94	Female	76	80.85	71.39	67.1	8.9	2.03	
		Minority	6	6.38	19.62	18.4	-12.4	-3.23	Yes
		Black	1	1.06	7.47	7.0	-6.0	-2.36	Yes
		Hispanic	2	2.13	3.58	3.4	-1.4	-0.76	
		Asian	1	1.06	5.75	5.4	-4.4	-1.95	
		AmIndian	0	0.00	0.42	0.4	-0.4	-0.63	
		NHOPI	0	0.00	0.00	0.0	0.0	0.00	
		Two+	2	2.13	2.41	2.3	-0.3	-0.18	

Comparison of Incumbency to Availability is performed using the Two Standard Deviation Test

Yes indicates Number of Standard Deviations <= -2.00

Incumbency v. Estimated Availability Detail

Job Group	Total Incumbents (#)	Category	Incumbents (#)	Incumbency (%)	Availability (%)	Expected Incumbents (#)	Difference (#) Exp. minus Inc.	Number of Standard Deviations	Less than Reasonably Expected?
220 Faculty, Arts & Sciences	217	Female	94	43.32	39.97	86.7	7.3	1.01	Yes Yes
		Minority	26	11.98	20.98	45.5	-19.5	-3.25	
		Black	2	0.92	3.49	7.6	-5.6	-2.06	
		Hispanic	3	1.38	3.92	8.5	-5.5	-1.92	
		Asian	12	5.53	8.05	17.5	-5.5	-1.37	
		AmIndian	2	0.92	2.29	5.0	-3.0	-1.35	
		NHOPI	0	0.00	0.00	0.0	0.0	0.00	
		Two+	7	3.23	3.22	7.0	0.0	0.00	
230 Faculty, Business	59	Female	21	35.59	38.41	22.7	-1.7	-0.45	
		Minority	10	16.95	23.94	14.1	-4.1	-1.26	
		Black	1	1.69	6.60	3.9	-2.9	-1.52	
		Hispanic	2	3.39	3.52	2.1	-0.1	-0.06	
		Asian	7	11.86	10.51	6.2	0.8	0.34	
		AmIndian	0	0.00	0.57	0.3	-0.3	-0.58	
		NHOPI	0	0.00	0.00	0.0	0.0	0.00	
		Two+	0	0.00	2.74	1.6	-1.6	-1.29	
240 Faculty, Education	89	Female	56	62.92	68.05	60.6	-4.6	-1.04	Yes
		Minority	8	8.99	20.64	18.4	-10.4	-2.72	
		Black	4	4.49	9.49	8.4	-4.4	-1.61	
		Hispanic	0	0.00	3.97	3.5	-3.5	-1.92	
		Asian	1	1.12	3.25	2.9	-1.9	-1.13	
		AmIndian	0	0.00	0.65	0.6	-0.6	-0.77	
		NHOPI	0	0.00	0.00	0.0	0.0	0.00	
		Two+	3	3.37	3.28	2.9	0.1	0.05	
250 Library	17	Female	15	88.24	65.62	11.2	3.8	1.96	Yes
		Minority	0	0.00	23.64	4.0	-4.0	-2.29	
		Black	0	0.00	8.97	1.5	-1.5	-1.29	
		Hispanic	0	0.00	3.36	0.6	-0.6	-0.77	
		Asian	0	0.00	6.16	1.0	-1.0	-1.06	
		AmIndian	0	0.00	1.34	0.2	-0.2	-0.48	
		NHOPI	0	0.00	0.00	0.0	0.0	0.00	
		Two+	0	0.00	3.80	0.6	-0.6	-0.82	

Comparison of Incumbency to Availability is performed using the Two Standard Deviation Test
 Yes indicates Number of Standard Deviations <= -2.00

Incumbency v. Estimated Availability Detail

Job Group	Total Incumbents (#)	Category	Incumbents (#)	Incumbency (%)	Availability (%)	Expected Incumbents (#)	Difference (#) Exp. minus Inc.	Number of Standard Deviations	Less than Reasonably Expected?
260 Athletics	45	Female	10	22.22	44.70	20.1	-10.1	-3.03	Yes
		Minority	9	20.00	21.81	9.8	-0.8	-0.29	
		Black	7	15.56	7.35	3.3	3.7	2.11	
		Hispanic	0	0.00	8.01	3.6	-3.6	-1.98	
		Asian	0	0.00	4.75	2.1	-2.1	-1.50	
		AmIndian	2	4.44	1.03	0.5	1.5	2.27	
		NHOPI	0	0.00	0.09	0.0	0.0	-0.20	
		Two+	0	0.00	0.58	0.3	-0.3	-0.51	
300 Other Professionals	357	Female	204	57.14	61.29	218.8	-14.8	-1.61	Yes
		Minority	44	12.32	23.36	83.4	-39.4	-4.93	
		Black	14	3.92	8.83	31.5	-17.5	-3.27	
		Hispanic	8	2.24	7.39	26.4	-18.4	-3.72	
		Asian	4	1.12	4.63	16.5	-12.5	-3.15	
		AmIndian	5	1.40	0.90	3.2	1.8	1.00	
		NHOPI	0	0.00	0.09	0.3	-0.3	-0.56	
		Two+	13	3.64	1.52	5.4	7.6	3.27	
400 Technicians & Para	122	Female	41	33.61	43.86	53.5	-12.5	-2.28	Yes
		Minority	11	9.02	13.52	16.5	-5.5	-1.45	
		Black	1	0.82	0.24	0.3	0.7	1.29	
		Hispanic	3	2.46	1.79	2.2	0.8	0.56	
		Asian	4	3.28	7.18	8.8	-4.8	-1.67	
		AmIndian	1	0.82	3.72	4.5	-3.5	-1.69	
		NHOPI	0	0.00	0.00	0.0	0.0	0.00	
		Two+	2	1.64	0.58	0.7	1.3	1.54	
500 Office Support & Clerical	157	Female	146	92.99	72.85	114.4	31.6	5.68	
		Minority	9	5.73	5.96	9.4	-0.4	-0.12	
		Black	1	0.64	1.17	1.8	-0.8	-0.62	
		Hispanic	1	0.64	2.28	3.6	-2.6	-1.38	
		Asian	0	0.00	0.16	0.3	-0.3	-0.50	
		AmIndian	1	0.64	1.54	2.4	-1.4	-0.92	
		NHOPI	0	0.00	0.00	0.0	0.0	0.00	
		Two+	6	3.82	0.81	1.3	4.7	4.21	

Comparison of Incumbency to Availability is performed using the Two Standard Deviation Test

Yes indicates Number of Standard Deviations <= -2.00

Incumbency v. Estimated Availability Detail

Job Group	Total Incumbents (#)	Category	Incumbents (#)	Incumbency (%)	Availability (%)	Expected Incumbents (#)	Difference (#) Exp. minus Inc.	Number of Standard Deviations	Less than Reasonably Expected?
600 Skilled Craft Workers	83	Female	6	7.23	6.94	5.8	0.2	0.11	
		Minority	3	3.61	5.29	4.4	-1.4	-0.68	
		Black	0	0.00	1.12	0.9	-0.9	-0.97	
		Hispanic	1	1.20	2.50	2.1	-1.1	-0.76	
		Asian	0	0.00	0.49	0.4	-0.4	-0.64	
		AmIndian	1	1.20	0.22	0.2	0.8	1.93	
		NHOPI	0	0.00	0.00	0.0	0.0	0.00	
		Two+	1	1.20	0.96	0.8	0.2	0.23	
700 Safety & Security	34	Female	6	17.65	26.43	9.0	-3.0	-1.16	
		Minority	2	5.88	11.36	3.9	-1.9	-1.01	
		Black	1	2.94	5.03	1.7	-0.7	-0.56	
		Hispanic	0	0.00	3.70	1.3	-1.3	-1.14	
		Asian	0	0.00	0.00	0.0	0.0	0.00	
		AmIndian	0	0.00	2.62	0.9	-0.9	-0.96	
		NHOPI	0	0.00	0.00	0.0	0.0	0.00	
		Two+	1	2.94	0.00	0.0	1.0	9999+	
800 Other Auxiliary Services	149	Female	58	38.93	40.25	60.0	-2.0	-0.33	
		Minority	10	6.71	10.29	15.3	-5.3	-1.44	
		Black	6	4.03	0.96	1.4	4.6	3.85	
		Hispanic	1	0.67	4.19	6.2	-5.2	-2.14	
		Asian	0	0.00	0.07	0.1	-0.1	-0.31	
		AmIndian	1	0.67	2.40	3.6	-2.6	-1.38	
		NHOPI	0	0.00	0.00	0.0	0.0	0.00	
		Two+	2	1.34	2.68	4.0	-2.0	-1.01	Yes
910 Temporary-Adjunct	210	Female	119	56.67	73.50	154.4	-35.4	-5.53	Yes
		Minority	16	7.62	5.11	10.7	5.3	1.65	
		Black	5	2.38	0.80	1.7	3.3	2.57	
		Hispanic	4	1.90	2.10	4.4	-0.4	-0.20	
		Asian	5	2.38	1.68	3.5	1.5	0.79	
		AmIndian	0	0.00	0.53	1.1	-1.1	-1.05	
		NHOPI	0	0.00	0.00	0.0	0.0	0.00	
		Two+	2	0.95	0.00	0.0	2.0	9999+	

Comparison of Incumbency to Availability is performed using the Two Standard Deviation Test
 Yes indicates Number of Standard Deviations <= -2.00

Incumbency v. Estimated Availability Detail

Job Group	Total Incumbents (#)	Category	Incumbents (#)	Incumbency (%)	Availability (%)	Expected Incumbents (#)	Difference (#) Exp. minus Inc.	Number of Standard Deviations	Less than Reasonably Expected?
920 Temporary-Staff	135	Female	70	51.85	54.78	74.0	-4.0	-0.68	
		Minority	17	12.59	7.56	10.2	6.8	2.21	
		Black	3	2.22	1.09	1.5	1.5	1.27	
		Hispanic	3	2.22	2.48	3.4	-0.4	-0.19	
		Asian	2	1.48	0.97	1.3	0.7	0.61	
		AmIndian	3	2.22	2.71	3.7	-0.7	-0.35	
		NHOPI	0	0.00	0.00	0.0	0.0	0.00	
		Two+	6	4.44	0.31	0.4	5.6	8.62	

Comparison of Incumbency to Availability is performed using the Two Standard Deviation Test

Yes indicates Number of Standard Deviations <= -2.00

Incumbency v. Estimated Availability

Job Group	Less than Reasonably Expected?							
	Female	Minority	Black	Hisp	Asian	AmInd	NHOPI	Two+
100 Administrators								
200 Faculty, Eng & Technology								
205 Faculty, Arts & Sciences	Yes	Yes						
210 Faculty, HHS		Yes	Yes					
220 Faculty, Arts & Sciences		Yes	Yes					
230 Faculty, Business								
240 Faculty, Education		Yes						
250 Library		Yes						
260 Athletics	Yes							
300 Other Professionals		Yes	Yes	Yes	Yes			
400 Technicians & Para	Yes							
500 Office Support & Clerical								
600 Skilled Craft Workers								
700 Safety & Security								
800 Other Auxiliary Services				Yes				
910 Temporary-Adjunct	Yes							
920 Temporary-Staff								

*Comparison of Incumbency to Availability is performed using the Two Standard Deviation Test
 Yes indicates Number of Standard Deviations <= -2.00*

Annual Placement Goals

Job Group	Placement Goals (%)							
	Female	Minority	Black	Hisp	Asian	AmInd	NHOPI	Two+
100 Administrators	-	-	-	-	-	-	-	-
200 Faculty, Eng & Technology	-	-	-	-	-	-	-	-
205 Faculty, Arts & Sciences	51.22	15.37	-	-	-	-	-	-
210 Faculty, HHS	-	19.62	7.47	-	-	-	-	-
220 Faculty, Arts & Sciences	-	20.98	3.49	-	-	-	-	-
230 Faculty, Business	-	-	-	-	-	-	-	-
240 Faculty, Education	-	20.64	-	-	-	-	-	-
250 Library	-	23.64	-	-	-	-	-	-
260 Athletics	44.70	-	-	-	-	-	-	-
300 Other Professionals	-	23.36	8.83	7.39	4.63	-	-	-
400 Technicians & Para	43.86	-	-	-	-	-	-	-
500 Office Support & Clerical	-	-	-	-	-	-	-	-
600 Skilled Craft Workers	-	-	-	-	-	-	-	-
700 Safety & Security	-	-	-	-	-	-	-	-
800 Other Auxiliary Services	-	-	-	4.19	-	-	-	-
910 Temporary-Adjunct	73.50	-	-	-	-	-	-	-
920 Temporary-Staff	-	-	-	-	-	-	-	-

Comparison of Incumbency to Availability is performed using the Two Standard Deviation Test

Incumbency v. Goal - Benchmark (Disability - Veteran) Summary

Job Group	Total Incumbents (#)	Category	Incumbents (#)	Incumbency (%)	Goal - Benchmark (%)	Less than Reasonably Expected?
100 Administrators	56	Disability Veteran	1 3	1.79 5.36	7.00 6.40	
200 Faculty, Eng & Technology	26	Disability Veteran	0 1	0.00 3.85	7.00 6.40	
205 Faculty, Arts & Sciences	57	Disability Veteran	1 0	1.75 0.00	7.00 6.40	Yes
210 Faculty, HHS	94	Disability Veteran	2 2	2.13 2.13	7.00 6.40	
220 Faculty, Arts & Sciences	217	Disability Veteran	1 1	0.46 0.46	7.00 6.40	Yes Yes
230 Faculty, Business	59	Disability Veteran	1 3	1.69 5.08	7.00 6.40	
240 Faculty, Education	89	Disability Veteran	3 0	3.37 0.00	7.00 6.40	Yes
250 Library	17	Disability Veteran	3 0	17.65 0.00	7.00 6.40	
260 Athletics	45	Disability Veteran	0 0	0.00 0.00	7.00 6.40	
300 Other Professionals	357	Disability Veteran	8 4	2.24 1.12	7.00 6.40	Yes Yes
400 Technicians & Para	122	Disability Veteran	1 5	0.82 4.10	7.00 6.40	Yes
500 Office Support & Clerical	157	Disability Veteran	3 1	1.91 0.64	7.00 6.40	Yes Yes
600 Skilled Craft Workers	83	Disability Veteran	2 3	2.41 3.61	7.00 6.40	

*Comparison of Incumbency to Goal-Benchmark is performed using the Two Standard Deviation Test
Yes indicates Number of Standard Deviations <= -2.00*

Incumbency v. Goal - Benchmark (Disability - Veteran) Summary

Job Group	Total Incumbents (#)	Category	Incumbents (#)	Incumbency (%)	Goal - Benchmark (%)	Less than Reasonably Expected?
700 Safety & Security	34	Disability Veteran	0 2	0.00 5.88	7.00 6.40	
800 Other Auxiliary Services	149	Disability Veteran	2 6	1.34 4.03	7.00 6.40	Yes
910 Temporary-Adjunct	210	Disability Veteran	4 8	1.90 3.81	7.00 6.40	Yes
920 Temporary-Staff	135	Disability Veteran	2 3	1.48 2.22	7.00 6.40	Yes Yes
Facility Total	1907	Disability Veteran	34 42	1.78 2.20	7.00 7.00	Yes Yes

*Comparison of Incumbency to Goal-Benchmark is performed using the Two Standard Deviation Test
 Yes indicates Number of Standard Deviations <= -2.00*

Goals - Benchmarks (Disability - Veteran)

	Less than Reasonably Expected?	
Job Group	Disability	Veteran
100 Administrators		
200 Faculty, Eng & Technology		
205 Faculty, Arts & Sciences		Yes
210 Faculty, HHS		
220 Faculty, Arts & Sciences	Yes	Yes
230 Faculty, Business		
240 Faculty, Education		Yes
250 Library		
260 Athletics		
300 Other Professionals	Yes	Yes
400 Technicians & Para	Yes	
500 Office Support & Clerical	Yes	Yes
600 Skilled Craft Workers		
700 Safety & Security		
800 Other Auxiliary Services	Yes	
910 Temporary-Adjunct	Yes	
920 Temporary-Staff	Yes	Yes
Facility Total	Yes	Yes

Comparison of Incumbency to Goal-Benchmark is performed using the Two Standard Deviation Test

Job Opening Estimates

Job opening projections are based upon University data on permanent faculty and staff openings filled for the seven-year period of October 1, 2010 – September 30, 2018. To help determine job opening estimates, positions filled for the period are analyzed both on the whole and by respective job group. A breakdown of positions filled can be seen below:

	Executive (100)	Kimmel (200)	F&PA (205)	HHS (210)	A&S (220)	Business (230)	E&AP (240)	Library (250)	Athletics (260)	Prof (300)	Tech (400)	Admin (500)	Skilled Crafts (600)	LE (700)	Svc/Mtn (800)	Total
2010	1	2	1	2	25	10	7	1	5	36	10	17	2	3	23	145
2011	2	2	2	13	9	4	6	5	14	38	11	14	4	5	17	146
2012	5	5	4	9	19	5	9	0	9	43	10	19	12	3	28	180
2013	7	3	3	12	25	5	7	1	8	39	11	26	13	4	28	192
2014	7	3	7	10	28	8	10	3	2	49	10	23	2	3	22	187
2015	6	4	6	8	21	6	8	3	12	45	8	29	5	8	26	195
2016	4	3	7	9	20	11	12	2	8	58	8	24	9	9	31	213
2017	3	4	10	8	14	4	8	2	9	52	16	29	1	7	21	188
2018	1	5	5	14	14	4	7	1	15	63	16	30	7	7	19	208
Total	36	31	45	85	175	57	74	18	82	423	100	211	55	49	213	1654
2018*	4.0	3.4	5.0	9.4	19.4	6.3	8.2	2.0	9.1	47	11.1	23.4	6.1	7.0	23.7	183.8

*Projected Openings for 2019 Plan Year. Job Groups where underutilization of minorities or females currently exists are highlighted.

**Recruitment and Selection Analysis
New Hires (10/01/2017-09/30/2018)**

	Total	Minority	Female
New Hires (Faculty)	50	10.0% (5)	46.0% (23)
New Hires (Staff)	158	15.8% (25)	52.5% (83)
New Hires (Total)	208	14.4% (30)	51.0% (106)

Total Hiring Actions (10/01/2017-09/30/2018)

	Total	Minority	Female	Veteran	Disability
New Hires	208	14.4% (30)	51.0% (106)	5.3% (11)	1.9% (4)
Promotions/Internal Hires	51	15.7% (8)	54.9% (28)	0.0% (0)	1.0% (1)
Total	259	14.7% (38)	51.7% (134)	4.3% (11)	1.9% (5)

Total Qualified/Seriously Considered/Interviewed Applicants

By Race	Qualified		Seriously Considered		Interviewed	
White	4,924	68.7%	1,010	74.8%	667	76.2%
Black	629	8.8%	88	6.5%	45	5.1%
Hispanic	293	4.1%	44	3.3%	33	3.8%
Asian	400	5.6%	41	3.0%	17	1.9%
American Indian	69	1.0%	11	0.8%	11	1.3%
Other	141	1.9%	20	1.5%	15	1.7%
Unknown	717	9.9%	136	10.1%	88	10%
Total	7,173	100%	1,350	100%	876	100%
Total Minority Availability*	1,532	21.4%	204	15.1%	121	13.8%
By Gender						
Male	3,772	54.7%	626	47.6%	413	48.1%
Female	3,128	45.3%	689	52.4%	445	51.9%
Identified as Disabled*	360	5.0%	60	4.4%	35	4.0%
Identified as Qualified Veteran*	222	3.1%	36	2.7%	21	2.4%

*Expected Availability: - Minority: 17.3%; Female: 50.1%; Disability: 7.0%; Veteran: 6.7%

X. IDENTIFICATION AND CORRECTION OF ISSUES

Western Carolina University performs in-depth analysis of its total employment process to determine if there are areas where minority and/or female groups face impediments to equal opportunity. These analyses are conducted in order to reveal any potential problem areas.

Placement Goals

The goal of the university's Affirmative Action planning is for women, racial/ethnic minorities, individuals with disabilities, and/or qualified veterans to be represented on our campus to the same extent as they are represented in the appropriate labor market groups. By comparing the current year's WCU work force percentage and the labor market availability for both women, racial/ethnic minorities, individuals with disabilities, and/or protected veterans by job group, the university establishes a placement goal or benchmark for job groups in which the work force (incumbency) percent when compared to the designated labor market is less than would reasonably be expected based upon statistical analyses. The Annual Placement Goal Report (see pg. 88) and the Goals-Benchmarks Report for Disabilities/Veteran Status (see pg. 91) revealed an underutilization and corresponding goal and/or benchmark for the job groups listed below.

Placement Goals for Females:

Job Group	October 2018 Labor Market Availability (GOAL)	October 2018 Percentage of Incumbents
205 Fine & Performing Arts	54.3%	35.1%
260 Athletics	44.5%	22.2%
400 Technicians & Para	43.9%	33.6%

Placement Goals for Minorities:

Job Group	October 2018 Labor Market Availability (GOAL)	October 2018 Percentage of Incumbents
205 Fine & Performing Arts	15.4%	5.3%
210 Health & Human Sciences	19.6%	6.4%
220 Arts & Sciences	20.9%	12.0%
240 Education & Allied Prof	20.6%	9.0%
250 Library	23.6%	0.0%
300 Other Professionals	23.3%	12.3%

Placement Goals for Individuals with Disabilities:

Job Group	October 2018 Labor Market Availability (GOAL)	October 2018 Percentage of Incumbents
220 Arts & Sciences	7.0%	0.5%
300 Other Professionals	7.0%	2.3%
400 Technicians & Para	7.0%	0.8%
500 Office Support & Clerical	7.0%	1.9%
800 Other Auxiliary Svcs.	7.0%	1.3%

Benchmarks for Qualified Veterans:

Job Group	October 2018 Labor Market Availability (BENCHMARK)	October 2018 Percentage of Incumbents
205 Fine & Performing Arts	6.4%	0.0%
220 Arts & Sciences	6.4%	0.5%
240 Education & Allied Prof	6.4%	0.0%
300 Other Professionals	6.4%	1.1%
500 Office Support & Clerical	6.4%	0.7%

For these job groups which have demonstrated an underutilization and where a placement goal and employment objective has been set, steps will be taken in order to increase the percentage of qualified females, minorities, individuals with disabilities, and/or qualified veterans applying for positions both externally and internally. These steps may include but are not limited to the following:

1. Strategic, targeted outreach efforts for vacancies and anticipated vacancies that are within a recognized underutilized job group.
2. Posting job advertisements in newspapers, on websites, and/or magazines that target females and/or minorities;
3. Offering job training for advancement of females and minorities currently employed by the University in order to increase chances of advancement.
4. Offering tuition waiver to employees to obtain training that will increase the chances of advancing within the organization; and
5. Continued use of the North Carolina Division of Employment Security (DES) to assist in attracting a diverse workforce.

Review of Employment Decisions

Review of employment decisions will be made in order to determine whether or not females/minorities are selected at a less favorable rate than males/non-minorities.

Review of Hires/Promotions

Whenever females/minorities are selected at a lower rate than males/on-minorities, a review of the applicant flow will be conducted to determine possible reasons why females/minorities were not selected at a more favorable rate. If the institution is not attracting enough females/minorities that fit the qualifications for the job groups, good faith efforts will be put into place to attempt to improve the applicant flow of qualified females/minorities.

Review of Terminations

For non-voluntary terminations, if females/minorities are being terminated at a higher rate than males/non-minorities, a review of the employee files will be made to ensure that the institution is applying its policies and procedures for termination equally for protected as well as non-protected classes.

Compensation

Annually, compensation will be reviewed in order to determine if there are any discrepancies in pay when comparing female to male rates of pay or minorities versus non-minority rates of pay. If, on average, females and/or minorities are being paid less within the same salary band and/or job title, and the difference in pay cannot be justified, Western Carolina University will put a plan in place to rectify the difference in pay for the protected class member(s). Western Carolina University also will ensure that benefits offered to all employees are in alignment with State Government practices.

Action Oriented Programs

To further address and improve identified problem areas, Western Carolina University will institute action programs designed to eliminate the identified problem areas and to help achieve specific affirmative action goals. These programs include:

1. Conducting annual analyses of job descriptions to ensure they accurately reflect job functions;
2. Reviewing job descriptions by department and job title using job performance criteria;
3. Making job descriptions available to recruiting sources and available to all members of management involved in the recruiting, screening, selection and promotion processes;

4. Evaluating the total selection process to ensure freedom from bias through:
 - a. Reviewing job applications and other pre-employment forms to ensure information requested is job-related;
 - b. Evaluating selection methods that may have a disparate impact to ensure that they are job-related and consistent with business necessity;
 - c. Training personnel and management staff on proper interview techniques; and
 - d. Training in EEO for management and supervisory staff. There were a total of 30 University managers and supervisors who completed the Equal Employment Opportunity Institute during the 2016-2017 plan year;
5. Using techniques to improve recruitment and increase the flow of minority and female applicants. Western Carolina University has undertaken the following actions:
 - a. Include the phrase "Equal Opportunity/Affirmative Action Employer" in all printed employment advertisements;
 - b. Place recruitment advertisements, when appropriate, in minority news media and women's interest media;
 - c. Disseminate information on job opportunities to organizations representing minorities, women and employment development agencies when job opportunities occur;
 - d. Encourage all employees to refer qualified applicants;
 - e. Request employment agencies to refer qualified minorities and women;
6. Ensuring that all employees are given equal opportunity for promotion. This is achieved by:
 - a. Posting promotional opportunities;
 - b. Offering counseling to assist employees in identifying promotional opportunities, training and educational programs to enhance promotions and opportunities for job rotation or transfer; and
 - c. Evaluating job requirements for promotion.

Outreach Efforts

The following is a listing of additional advertisement venues by position type used during the EEO Reporting period of October 1, 2017 – September 30, 2018. WCU continues to expand its recruitment resources to enhance the diversity of our applicant pools through our continued membership and participation in the North Carolina Higher Education Recruitment Consortium (HERC) and its Regional Advisory Board. This is a national non-profit association established by human resources, faculty affairs and diversity leaders. The HERC of the Carolinas website features a job board that includes WCU faculty and professional non-faculty position announcements as well as an in-depth university profile. Two of the many benefits of HERC is the dual career support in assisting dual-career couples and targeted diversity outreach through national and regional diversity conferences and job fairs. Partnerships with HERC include the following:

- National Organization of Gay and Lesbian Scientists and Technical Professionals
- Our Ability
- Diverse Scholar
- Women in Engineering ProActive Network
- The Hispanic Association of Colleges and Universities
- American Association of University Women

WCU also posts all Faculty and EHRA non-faculty positions on HigherEdJobs.com and InsideHigherEd.com. Both sites feature an in-depth university profile that includes WCU's statement of commitment to diversity and inclusion in the recruitment and retention of its diverse employees.

Beginning on October 1, 2017, WCU partnered with localjobnetwork.com with the goal of increasing our effectiveness in identifying and recruiting qualified individuals with disabilities and protected veterans. This partnership also enhanced WCU's reporting capability for the ESDS State Job Bank. The NC State ESDS does provide a veteran priority hold for the first 24 hours from the time of posting.

During this EEO Reporting period of October 1, 2017 – September 30, 2018, WCU's partnership with localjobnetwork.com greatly expanded WCU's outreach to the following categories:

- Diversity Organizations
 - Refuge Ranch Ministries
 - Children's Home Society
 - Kitrell Job Corps Center
 - Schenck Job Corps Center
 - Oconaluftee Job Corps Center
 - Assistance League Charlotte

- Association for Career and Technical Education
- Pine Knot Job Corps Center
- The Museum of the Native American Resource Center
- People with Disabilities
 - Various Vocational Rehabilitation organizations throughout the state of NC
- Veterans
 - ESGR – Employer Support of the Guard and Reserve – Greenville
 - Georgia Department of Veterans Services – Gainesville
 - Army Career and Alumni Program (ACAP) – Fort Myer
 - Clay County Veteran Services
 - Graham County Veteran Services
 - Haywood County Veteran Services
 - Henderson County Veteran Services
 - Macon County Veteran Services
 - Madison County Veteran Services
 - Polk County Veteran Services
 - Rutherford County Veteran Services
 - Swain County Veteran Services
 - Transylvania County Veteran Services
 - Yancey County Veteran Services
 - WOVEN (Women Veterans Network)
- Women’s Organizations
 - WTS-Women’s Transportation Seminar – NC Triangle Chapter
 - Displaced Homemaker Program – Swain County; Macon County
 - Independent Life Skills Program
 - Women Marines Association (Area 3)
- State Workforce Agencies
 - Jones County JobLink Career Center
 - Charlotte/Mecklenburg JobLink Career Center
 - Other various JobLink Career Center locations across the state of NC

Overall engagement with the LocalJobsNetwork found job postings details were accessed 13,094 times with 393 individuals submitting applications.

Specific Recruitment Outlets by Position Category:

SHRA

Sylva Herald
 Asheville Citizen-Times
 The Waynesville Mountaineer
 Cherokee One Feather
 Franklin Press

Chronicle of Higher Education
Indeed.com
HigherEdJobs.com
InsideHigherEd.com
LinkedIn
APPA Website (architecture)
AIA Website (architecture)
Dice.com (Information Technology)
National Association of Collegiate Directors of Athletics
College Sports Information Directors of America
National Collegiate Athletic Association
North Carolina Association for Institutional Research
Southern Association for Institutional Research
Association for Institutional Research
American Association of Collegiate Registrars and Admissions Officers
National Association of College and University Business Officers
Special Diversity Publications – School of Teaching & Learning - #182778

EHRA

Cherokee One Feather
CACRAO – The Carolinas Associate of Collegiate Registrars and Admissions Officers
SACRAO – Southern Associate of Collegiate Registrars and Admissions Officers
AACRAO – American Association of Collegiate Registrars and Admissions Officers
UNC Registrar Listserv
Diversity.com
HispanicsinHigherEd.com
BlacksinHigherEd.com
Student Affairs Professionals Facebook Group
Residence Life Professionals Facebook Group
Women of Color in Student Affairs Facebook Group
DiversityEducation.com
IMDIVERSITY.com
AcademicDiversitySearch.com
DiverseEducation.com
HispanicOutlook.com
AsianHigherEd.com
Women In Higher Education website
Equal Opportunity Publications website
Women In Academia website
American Indian College Fund website
Association for University and College Counseling Center Directors listserv
Association for the Coordination of Counseling Center Clinical Services listserv

Association of Counseling Center Training Agencies listserv
Association for University and College Counseling Center Outreach listserv
College Music Society
LinkedIn
Dice.com (Information Technology)

Faculty

InsideHigherEd.com
HigherEdJobs.com
American Society for Engineering Education listserv
Associated Schools of Construction listserv
Association of American Geographers job board
Ecological Society of America job board
Department of Wildlife and Fisheries Sciences at Texas A&M University job board
Chemical and Engineering News job board
American Society of Civil Engineering job board
American Society for Nutrition job board
PublicHealthJobs website
American Public Health Association (APHA) job board
American College Health Association (ACHA) job board
American Academy of Forensic Science website
Professional Engineering listservs
Chronicle of Higher Ed

Other Targeted Outreach

Southwestern Community College Job Placement Fair
Western Carolina University Career Day and Job Fair
UNC-System Office Outreach on our behalf